



2006 Compliance Assistance Conference



Spill Prevention Control & Countermeasures Plans (SPCC)

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Session Overview

- ★ What is SPCC?
- ★ Who is regulated under SPCC?
- ★ What are the SPCC regulations?
- ★ How do I prepare an SPCC Plan?
- ★ Where can I get help?
- ★ Q&A



What Is SPCC? Is It New ?

- ★ Promulgated in 1973
- ★ Revisions in subsequent years
 - ★ Attempts to update rule, early to mid 1990s
 - ★ Facility Response Plans (FRPs), July 2002
 - ★ Final rule to extend deadlines, August 11, 2004



What is SPCC ?

- ★ Required by 40 CFR Part 112 (Section 311 of the Clean Water Act)
- ★ Required for facilities that store and use oil*
- ★ Designed to be a “Prevention Plan” rather than a “Response Plan”



What is SPCC ?

- ★ Regulatory authority lies with USEPA
- ★ Ohio EPA has provisions for prevention under ORC 6111
 - ★ Ohio EPA has not promulgated regulations
 - ★ Ohio EPA is conducting compliance inspections



Facility Triggers

- ★ Non-transportation related oil* storage
- ★ Storage Thresholds
 - ★ Aggregate storage capacity of > 1,320 gals.
 - ★ Underground storage capacity of > 42,000 gals.*
- ★ Reasonable Expectation of Discharge to Navigable Waters*



Definition of Oil

- ★ **OIL** - Oil of any kind or in any form, including, but not limited to petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes other than dredged spoil.
- ★ Includes animal & vegetable oils, non-petroleum oils – synthetic, fish oils, seed oils



Definition of Navigable Waters

- ★ **NAVIGABLE WATERS** means all navigable waters of the United States, including: interstate waters, intrastate waters, tributaries of such waters and adjoining shoreline.

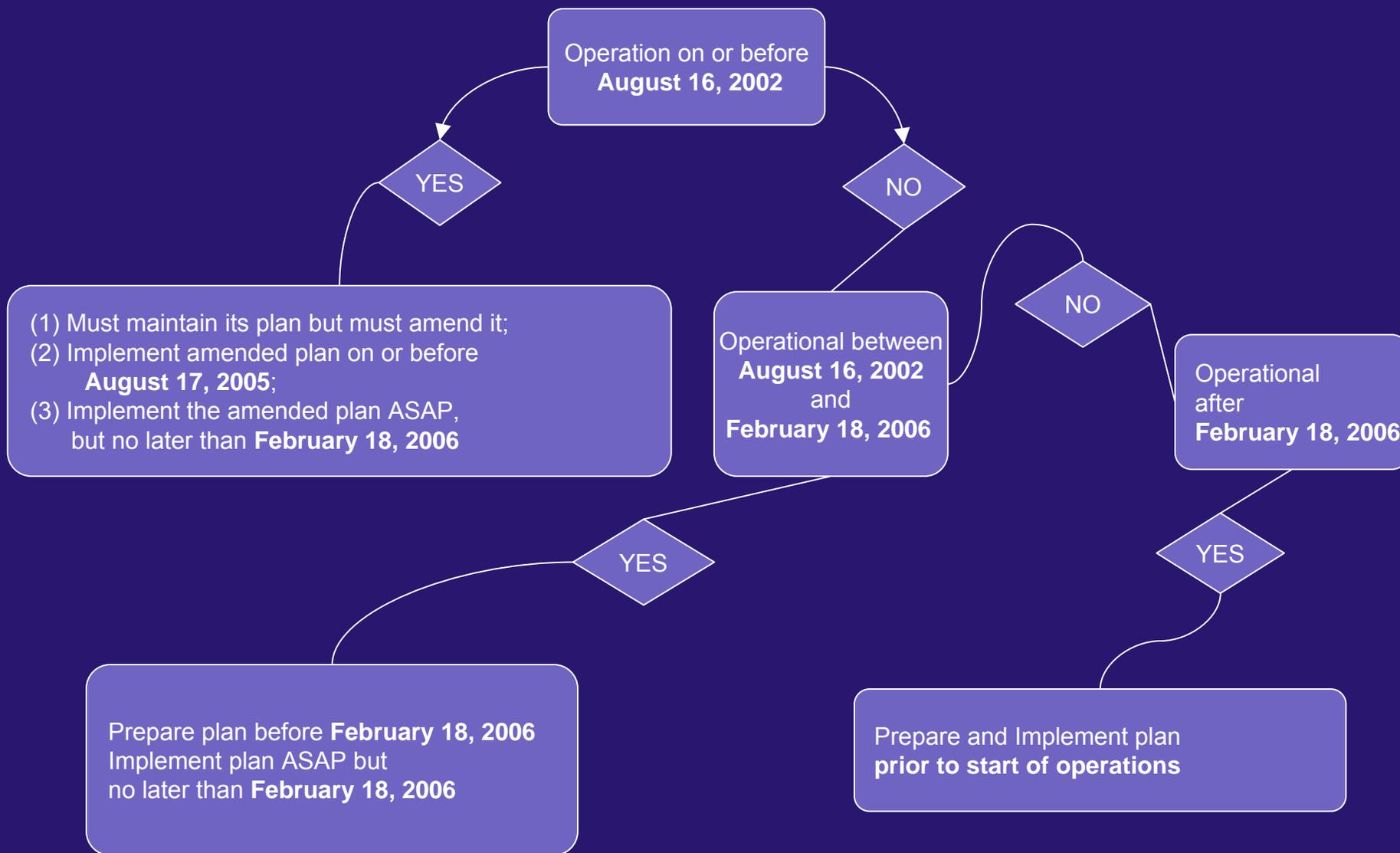


Availability of Plans

- ★ If facility is manned a minimum of 4 hrs./day
- ★ Or... the nearest field office for on-site review during normal working hours
- ★ Implementation dates*



SPCC Changes Compliance Dates



SPCC Changes



- ★ The “660 gallons in a single tank” has been deleted. Now based on aggregate above ground storage of 1,320 gallons or larger.
- ★ Containers of 55 gallons or larger are to be counted.



SPCC Changes

- ★ Completely buried tanks subject to UST regulations (40 CFR 280 or 281) are no longer used to calculate the 42,000 gallon underground storage threshold.*



SPCC Changes

- ★ SPCC Plan Preparation – otherwise exempt facilities
- ★ Alternative Formats for Plan
- ★ Five Year Review, documentation of review *
- ★ Business Records
- ★ “Should to Shall to Must”
- ★ Professional Engineers (PEs)



Additional SPCC Changes

- ★ Brittle fracture evaluation*
- ★ Employee training
- ★ New format – new sections and subparts
- ★ “Plain English”



Are you prepared?



SPCC at Glance

- ★ Subpart “A”
 - ★ Sections 112.1 through 112.7
- ★ Subpart “B”
 - ★ Sections 112.8 through 112.11
- ★ Subpart “C”
 - ★ Sections 112.12 through 112.15
- ★ Subpart “D”
 - ★ Sections 112.20 through 112.21
- ★ Appendices “A” – “F”



SPCC at Glance

Subparts

- ★ Subpart A
 - ★ Applicability, Definitions, General Requirements for all facilities and all types of oil



SPCC at Glance

Subparts

- ★ Subpart B
- ★ For petroleum oils and non petroleum oils
 - ★ 112.8 – Onshore (excluding production)
 - ★ 112.9 – Onshore production facilities
 - ★ 112.10 – Onshore oil drilling and work-over facilities
 - ★ 112.11 – Offshore oil drilling and work-over facilities



SPCC at Glance

Subparts

- ★ Subpart C
- ★ For animal fats and oils and greases, and fish and marine oils and for vegetable oils including oils from seeds, nuts, fruits and kernels (Section 112.12 through 112.15)



SPCC at Glance

Subparts

- ★ Subpart C

- ★ 112.12 – Onshore (excluding production)

- ★ 112.13 – Onshore production facilities

- ★ 112.14 – Onshore oil drilling and work-over facilities

- ★ 112.15 – Offshore oil drilling and work-over facilities



SPCC at Glance

Subparts

- ★ Subpart D

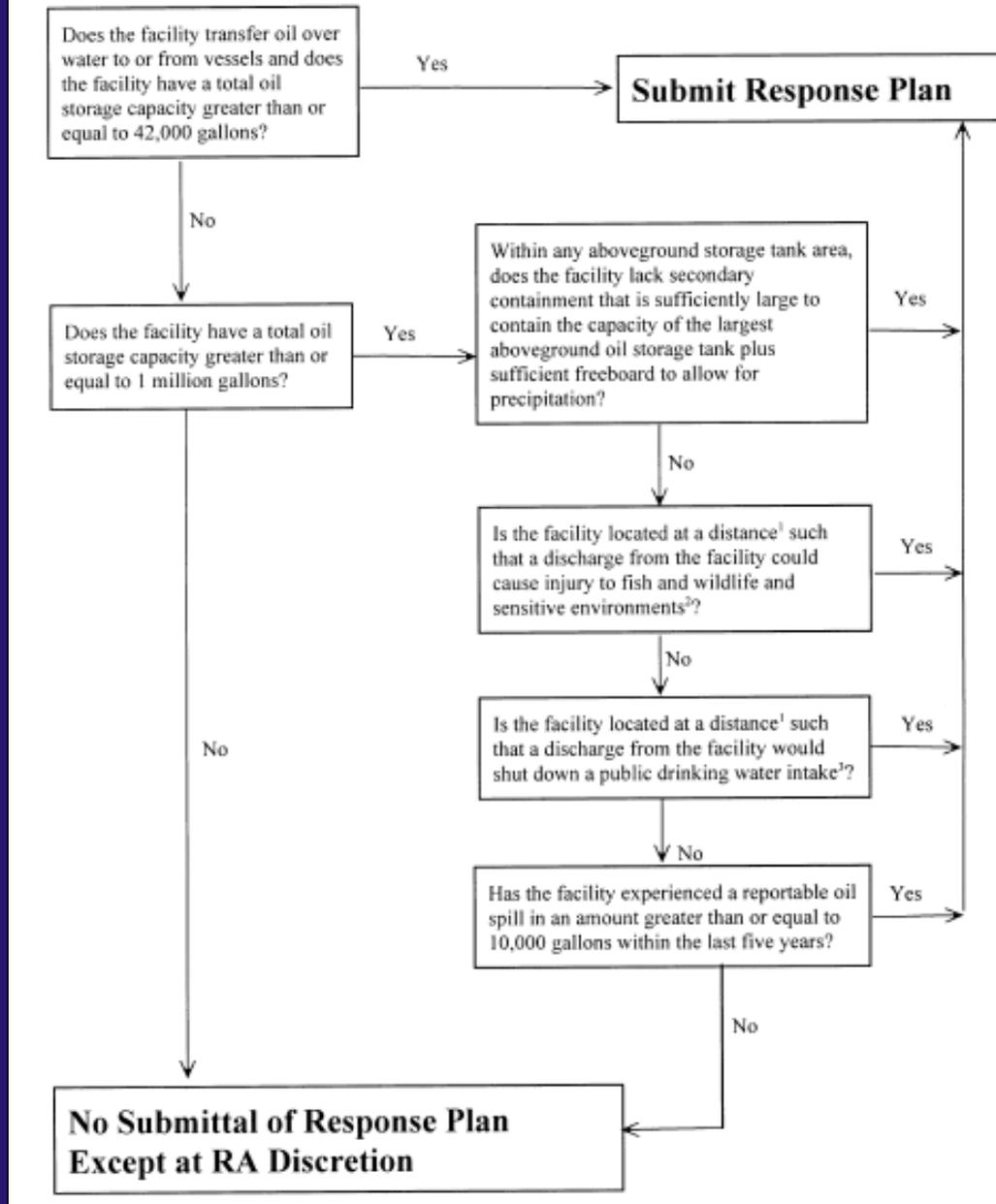
- ★ For response requirements (Section 112.20 through 112.21)

- ★ 112.20 – Facility response plans

- ★ 112.21 – Facility response training and drills / exercises



Flowchart of Criteria for Substantial Harm



Substantial Harm (FRP)

- ★ Transfer over water from vessel & have > 42,000 gallon storage capacity - YES
- ★ Total Storage Capacity > 1 million gallons
 - ★ Secondary containment?
 - ★ Sensitive area?
 - ★ Nearby public water intake?
 - ★ Reportable spill of 10,000 gallons in last 5 years?



Substantial Harm (FRP)

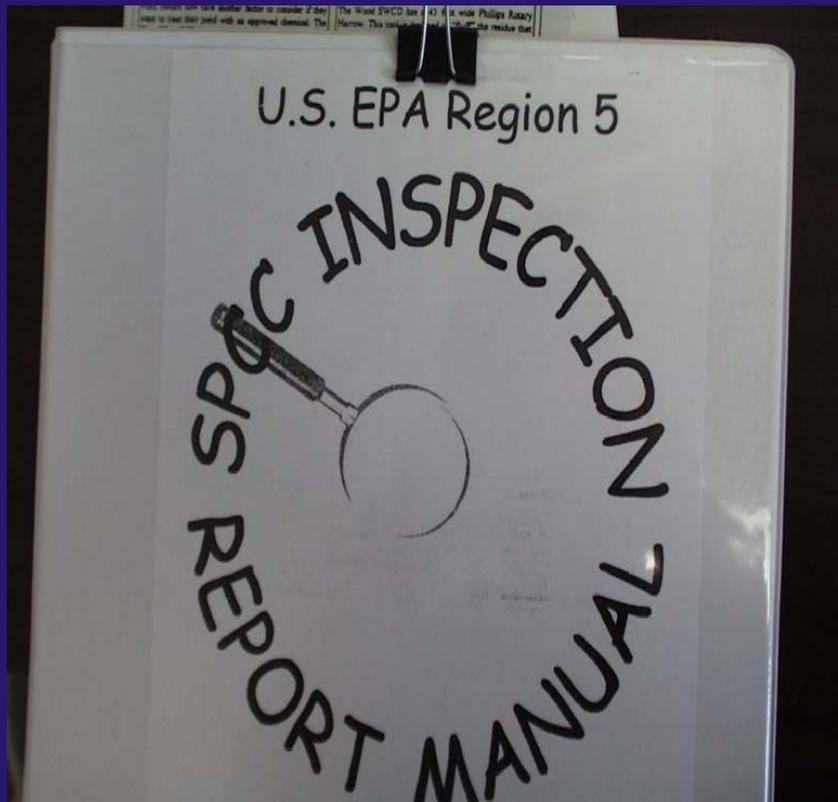
- ★ If yes to any of the above, you need to develop a Federal Response Plan (FRP)



Preparing an SPCC Plan



Prep for Plan



- ★ Decide what you can do
- ★ Gather information
- ★ Contact either/or
consultant
Professional Engineer*

A “Working” Plan



The Plan

- ★ Section 112.1

 - ★ General Applicability

- ★ Section 112.2

 - ★ Definitions

- ★ Section 112.3

 - ★ Requirement to prepare & implement



The Plan

- ★ Section 112.4
 - ★ Amendment by Regional Administrator
- ★ Section 112.5
 - ★ Amendment by Owners/Operators
- ★ Section 112.6
 - ★ [Reserved]



The Plan



- ★ Section 112.7
 - ★ “The Nuts & Bolts”
 - ★ Required by “all” facilities

The “Nuts & Bolts”

- ★ COVER PAGE(s)

- ★ Site location

- ★ Original date of plan, date of last plan review

- ★ Date of last amendment/P.E. certification

- ★ Designated facility contact person

- ★ P.E. certification



The “Nuts & Bolts”

★ COMPLIANCE REVIEW/MANAGEMENT APPROVAL

- ★ Citation of 40 CFR 112.5(b), plan review every five years minimum
- ★ Statement of commitment by management
- ★ Signature of management



The “Nuts & Bolts”

- ★ Required Elements:
 - ★ Operating procedures that prevent oil spills;
 - ★ Control measures installed to prevent spills from reaching navigable waters; and,
 - ★ Countermeasures to contain, clean up, and mitigate spills reaching waterways.
- ★ Each SPCC Plan must be “unique to the facility.”

Part 112.7

- ★ 112.7 (a)(3)

- ★ Description of the physical layout and facility diagram

- ★ 112.7 (a)(3)(vi)

- ★ Contact list & phone numbers

- ▶ Facility contacts (facility response coordinators & backups)
 - ▶ Agency contacts (Local, State & Federal)



Part 112.7

★ 112.7 (a)(4)

★ Written reporting procedure

- ▶ This section spells out reporting requirements



Part 112.7

★ 112.7 (b)

- ★ Predictions of direction, rate & flow, and total quantity of oil that could be discharged, where experience indicates a potential for equipment failure.



Worst Case Scenarios

Can't use the "But... I've never had a spill"



Part 112.7

★ 112.7 (b)

★ Table format

- ▶ Tank #
- ▶ Volume, contents
- ▶ Material of construction
- ▶ External protection
- ▶ Level indicators
- ▶ Secondary containment
- ▶ Type of failure
- ▶ Volume of spill
- ▶ Flow direction
- ▶ Flow rate





Part 112.7

★ 112.7 (c)

- ★ Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge
- ★ System, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs.





Part 112.7

- ★ Part 112.7 (c)

- ★ On-Shore facility minimums:
 - ★ Dikes, berms or retaining walls
 - ★ Curbing; culverts, gutters or other drainage system
 - ★ Weirs, booms, other barriers
 - ★ Spill diversion ponds, retention ponds
 - ★ Sorbent materials



Containment



Part 112.7

- ★ Part 112.7 (d)
- ★ Statement of impracticability provided you meet:
 - ★ 1 - Oil spill contingency plan;
 - ★ 2 – Written commitment of manpower



Part 112.7

- ★ Part 112.7 (e)

- ★ Inspections, tests, and records
 - ★ Developed by the facility and/or engineer
 - ★ Signed by appropriate supervisor
 - ★ Kept with plan for three (3) years
 - ★ Inspection records kept under usual and customary business practices



Part 112.7

- ★ Part 112.7 (f)
- ★ Personnel training and discharge prevention procedures
 - ★ Train “oil handling” personnel*
 - ▶ To include: operations; discharge procedures; pollution control laws, rules regulations; contents of SPCC Plan



Part 112.7

- ★ Part 112.7 (g)

- ★ Security

 - ★ Fenced*

 - ★ Master flow valves controlled

 - ★ Locked starter controls

 - ★ Lighting*

 - ▶ To allow discovery of spill at night

 - ▶ Reduces vandalism



Part 112.7 (g)



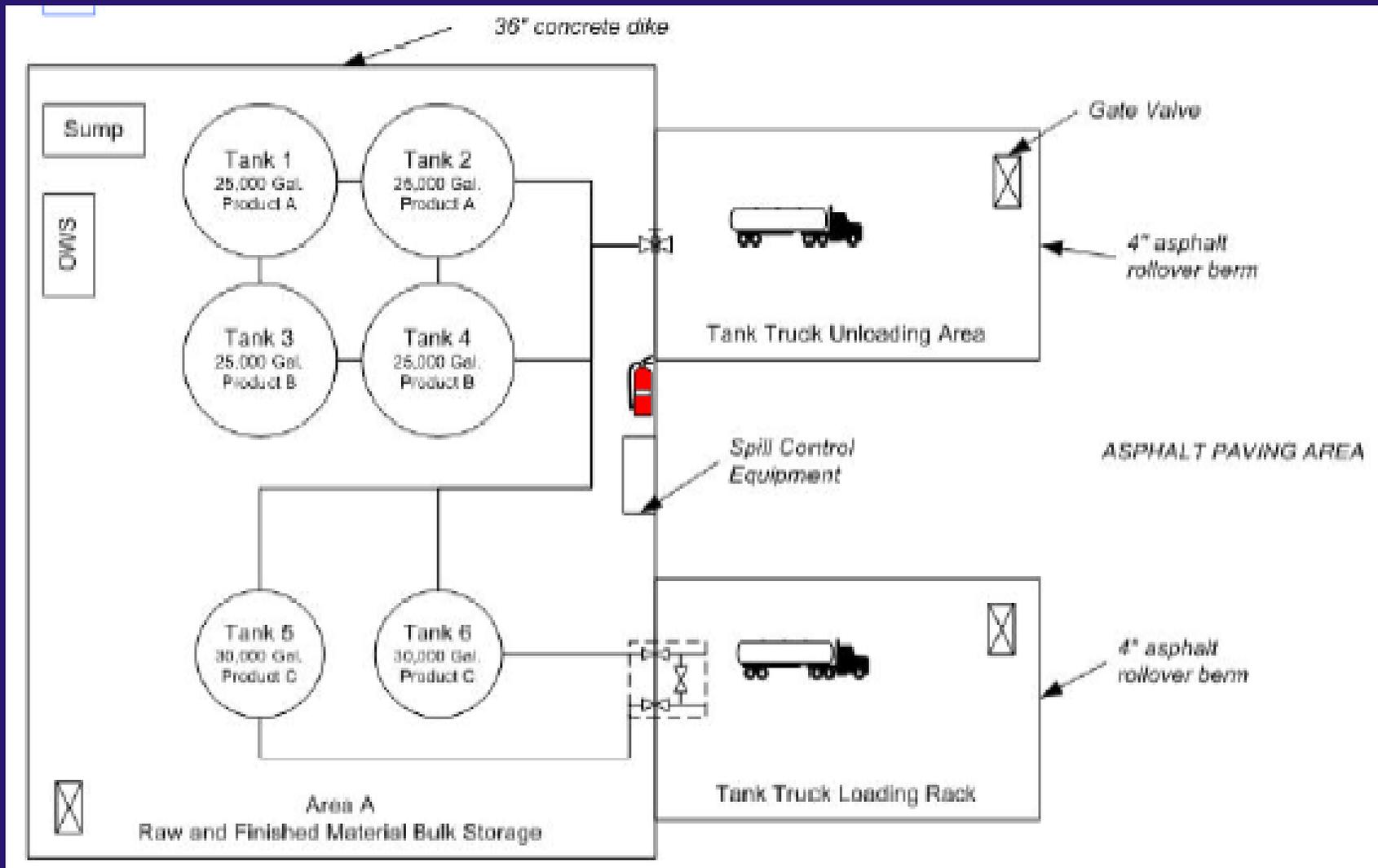
Part 112.7

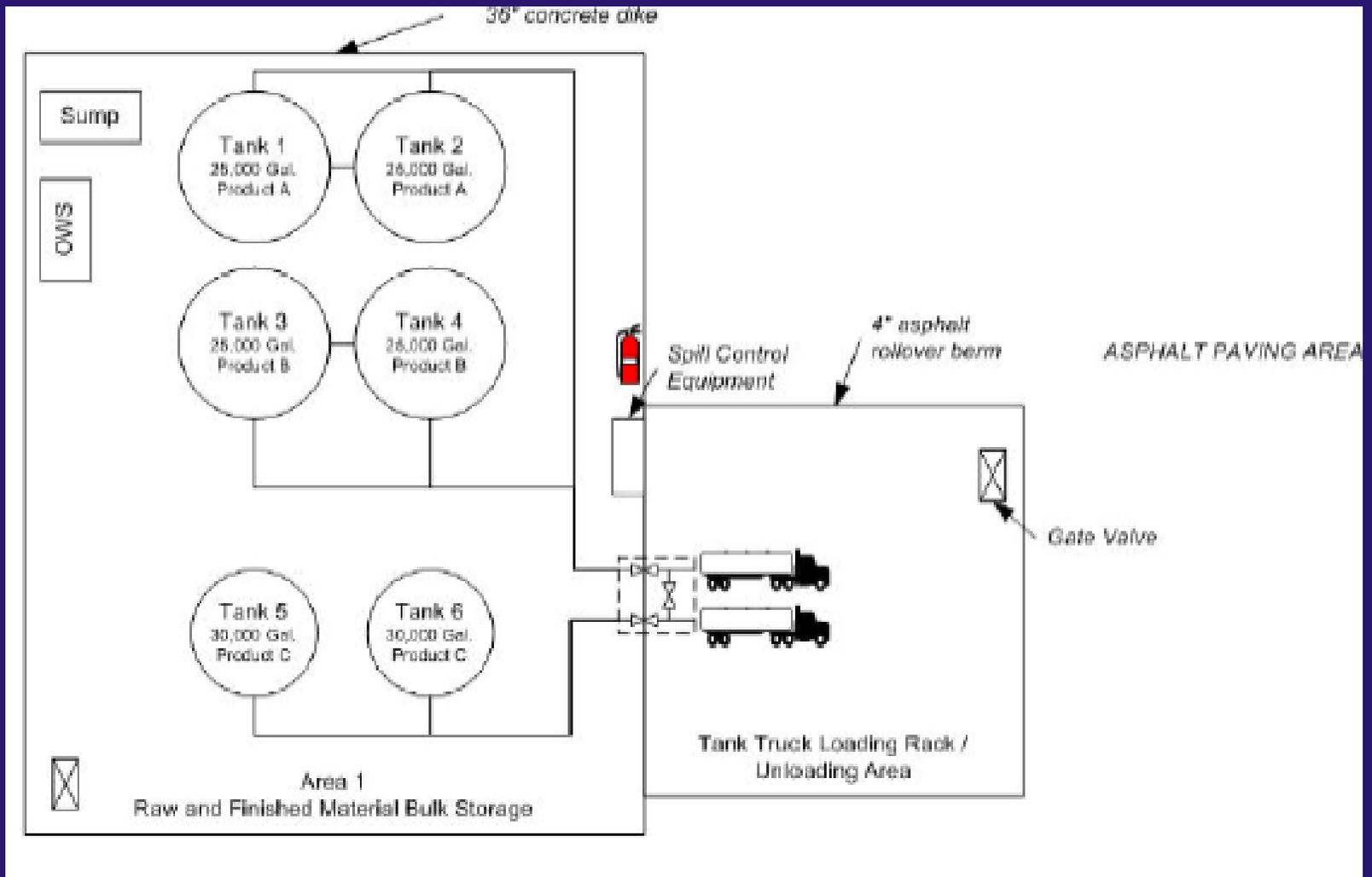
- ★ Part 112.7 (h)
- ★ Facility tank car & tank truck loading/unloading rack
 - ★ Containment at point of loading/unloading
 - ▶ Must contain largest single compartment of truck or tank car
 - ★ Warning system or physical barrier to prevent departure before disconnecting
 - ★ Inspection prior to transit



Part 112.7 (h)







Subpart B

- ★ Part 112.8
- ★ For petroleum oils and non petroleum oils
 - ★ 112.8 – Onshore (excluding production)
 - ★ Sections – (a) through (d)



Part 112.8

- ★ Part 112.8 (a)

- ★ Meet the general requirements of Part 112.7



Part 112.8

★ Part 112.8 (b) - Facility drainage

- (1) Discharges from diked areas
- (2) Use of valves on diked areas
- (3) Drainage from undiked areas
- (4) Alternate drainage systems
- (5) Multiple “treatment” system transfers



Part 112.8

★ Part 112.8 (c) – Bulk Storage containers

- (1) Compatibility
- (2) Secondary containment (defines capacity)
- (3) Discharge of dike water and record keeping
- (4) UST corrosion protection
- (5) Protection of partially buried tanks





Part 112.8

- ★ Part 112.8 (c) – Bulk Storage containers

- (6) Integrity testing

- ▶ Gives guidance on frequency, method, inspections, and record keeping of field constructed tanks



Part 112.8

- ★ Part 112.8 (c) – Bulk Storage containers
 - (7) Internal heating coils
 - (8) Alarm systems and their testing
 - (9) Effluent treatment systems
 - (10) Prompt response to small spills
 - (11) Portable or mobile tank site storage





Part 112.8

- ★ Part 112.8 (d) – Facility transfer operations, pumping, and facility process
 - (1) Buried piping – protection of underground piping
 - (2) Sealing “not-in-service” piping
 - (3) Piping supports
 - (4) Inspection of piping
 - (5) Piping “warning signs”

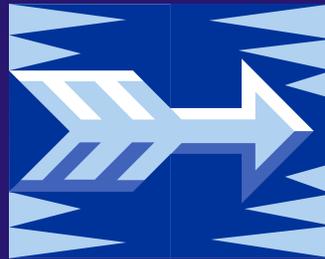


Multiple Plans



Different substances stored at a facility could require other types of plans, such as; OSHA Chemical Process Safety, Storm Water Management Plan, RCRA Hazardous Waste Contingency Plan or a Risk Management Plan.

Prevention



Where Can I Get Help?

★ USEPA's Web Page

★ www.epa.gov/oilspill



Ohio EPA Spill Prevention Contacts

- ★ Bowling Green (NWDO)
 - ★ Mike Czeczele 419-352-3146
- ★ Twinsburg (NEDO)
 - ★ Bruce Miller 330-963-1221
- ★ Logan (SEDO)
 - ★ Mark Stello 740-385-8501
- ★ Dayton (SWDO)
 - ★ Jim Crawford 937-285-6039
- ★ Columbus (CDO)
 - ★ Chris Bonner 614-728-3829



Questions?

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