

Spill Prevention, Control and Countermeasure Plans (SPCC)

10/12/2007

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Who Is Required to Have a SPCC Plan?

- Any fixed facility that could reasonably be expected to discharge oil into or upon navigable waters of the US.
 - Navigable waters do not have to be navigable. Almost no one gets out of SPCC by claiming a spill won't reach "Navigable Waters".

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Who Is Required to Have a SPCC Plan?

- Any facility that has aboveground bulk oil aggregate storage capacity of 1,320 gallons or more.
 - This includes 55-gallon drums (drums < 55-gallons are not included).

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What Is an Oil?

- According to the EPA, oil includes:
 - Crude Oil.
 - Petroleum & Petroleum Refined Products (gasoline & diesel fuel).
 - Non-petroleum oils like vegetable and animal oils.
- If anything other than these we must contact EPA to determine if they categorize it as an oil.

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Who Regulates These Rules

- The Federal Environmental Protection Agency (EPA) regulates the SPCC rules.
 - Therefore, the same rule applies to each state.
 - EPA for Minnesota is located in Chicago—Region V (312-353-8200).
 - Keep in mind: Just because a state or local agency says your site is in compliance doesn't mean it is in compliance with the EPA regulations.

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What a SPCC Plan Must Cover?

- Secondary containment for AST storage area.
 - The size of the containment should be sufficient to contain the contents of the largest tank plus freeboard for precipitation if outdoors.
- Secondary Containment for load/unload area.
 - If loading rack is not present, would not need sized secondary containment. However, they still fall under general secondary containment requirements.
 - If loading rack is present, would need sized secondary containment sufficient to contain the contents of the largest tank plus freeboard for precipitation.

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What a SPCC Plan Must Cover?

- Appropriate employee training in case a spill occurs.
- Routine inspections performed by employees of facility.
- Appropriate signage (No Smoking, Emergency Numbers, Tank contents, etc...).
- Appropriate cleanup items on hand in case of spill (booms and other absorbent material).

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Deadline

- July 1, 2009 to amend and implement existing SPCC Plans (If they don't have a SPCC Plan in place they need to have a plan prepared and implemented immediately).
 - ◆ NOTE: If you had your SPCC prepared after 2002, the July 1, 2009 deadline does not apply to you. Your plan must be implemented immediately.
- All new facilities must prepare and implement a SPCC Plan within 30 days of starting operations.

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Further Revisions

- The deadline was extended to July 1, 2009 so the EPA could propose further revisions to the SPCC rule in 2007.
- On October 1, 2007, EPA signed a proposed rule to amend the SPCC requirements so they will encourage greater compliance with the SPCC regulations.

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Key Revisions

December 2006 Amendment:

- EPA exempted mobile airport refuelers from the sized secondary containment requirements. However, they still fall under general secondary containment requirements.

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Key Revisions

Proposed Rule (Oct. 1, 2007):

- Allow the use of SPCC Plan template if facility has no individual oil storage container greater than 5,000-gallons with an aggregate of less than 10,000-gallons.

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Key Revisions

Proposed Rule:

- Allow forms of security other than fencing.
 - ◆ Owner/operator must describe how he will:
 - Secure and control access to all oil handling, processing and storage areas;
 - Secure master flow and drain valves;
 - Prevent unauthorized access to starter controls on oil pumps;
 - Secure out-of-service and loading/unloading connections of oil pipelines; and,
 - Address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.

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Key Revisions

Proposed Rule:

- Allow an owner/operator to adopt inspection requirements outlined in industry standards without the need for environmental equivalence determinations to be certified by a PE.

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Key Revisions

Proposed Rule:

- The owner shall test/inspect each aboveground container for integrity on a regular schedule and whenever material repairs are made.
- The owner shall determine, in accordance with industry standards, the appropriate qualifications of personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design.

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STI SP001 Inspection Standard

- STI SP001.
 - ◆ The owner shall use the AST's type, size and type of installation, corrosion rate and previous inspection history, if any, to develop a schedule of applicable types of inspections for each AST.
 - CRDM – Continuous release detection method.
 - RPB – Release prevention barrier.

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