

SPILL PREVENTION CONTROL & COUNTERMEASURES (SPCC)

PMPA

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HZW ENVIRONMENTAL
CONSULTANTS, LLC

OVERVIEW – SPCC Requirements

- SPCC regulations created by the 1974 Clean Water Act.
- Regulations modified in December 2002 with lots of amendments
- Regulates all facilities that store more than 1,320 gallons of oil in containers 55 gallons or greater.
- All petroleum & non-petroleum based oils are regulated (e.g. hydraulic oil, used oil, machining coolants).



OVERVIEW – SPCC Requirements

- Does not include underground storage tanks that are in compliance with state and federal construction and monitoring requirements.
- SPCC Plans are required to be in compliance with current regulations by November 10, 2011.

SPCC Plan Elements

- If you are subject to SPCC Requirements, you must prepare an SPCC Plan. The Plan must describe:
 - Facility – you may define how you wish it; if you have more than one building, you can split it into different facilities.
 - Storage containers and content
 - Secondary containment
 - Facility map showing flow directions, storage/oil filled equipment areas, spill kits.
 - Site Security
 - Training and Inspections



SPCC Plan Elements

- Plan must be certified by the plant owner/responsible person
- Can also be “self-certified” if total oil storage is less than 10,000 gallons, and is in compliance with secondary containment provisions
- If oil storage is greater than 10,000 gallons, Plan must be certified by a Professional Engineer certified in your state.



Secondary Containment

Secondary containment *contains* a release or *slows* the release to allow for countermeasures.

- Can include dikes, building walls, double-walled tanks and piping;
- Secondary containment plus sufficient manpower to address a spill is sufficient.



Countermeasures

Countermeasures are implemented *if a release occurs* and/or can assist in preventing a release

- Spill kits
- Drain covers
- Inspections
- Training



Quarterly Inspections & Forms

- Conditions of drums and tanks
- Drum labeling
- Spill kits equipped with proper supplies
- Proper operation of any automated containment monitors (e.g. leak detection, overflow float switches, etc.)
- May need integrity testing of ASTs

Annual training

- Must conduct annual site-specific personnel training for persons responsible for oil containers, spill prevention, inspections—pretty much anyone working with oil.
- Training includes:
 - Operations and maintenance of equipment;
 - Discharge procedure protocols;
 - Applicable pollution control laws, rules and regulations;
 - General facility operations;
 - Contents of the SPCC Plan.



Spills & Releases

What to know in the event of a spill or release:

- The locations of nearest spill kits and phone
- Know who your facility to contact in the event of a spill or release
- Document spills & releases
- Maintain documentation with Plan



Emergency Contact List (partial)

Must be posted in central location and be kept up to date in the Plan. It needs to include:

Primary Contact per shift

Secondary Contact per shift

Other-Federal, State, and Local Agencies

U.S. EPA/ U.S. Coast Guard National Response Center

County Local Emergency Planning

State EPA- Emergency Response

Local Police and Fire Departments



Reporting Releases

Releases must be reported in the following circumstances:

- An off site spill in excess of a chemical's Reportable Quantity (RQ).
- Oil - Any amount that causes a sheen on a surface water or 25 gallons.



Reporting Releases

Within 30 Minutes

State EPA

Local Fire Dept.

County LEPC

Within 24 Hours

National Response Center: 800-424-8802

What to know when you report

Plant contacts, location and material discharged, estimated quantity, time and duration, medium to which it is released, precautions taken to minimize release, evacuation activities (if taken)



Violations of SPCC Regulations

- Enforcement Actions - Time and \$
- Potential Fines of \$25,000 per day per violation
- Imprisonment

