



SPCC Spill Prevention Control and  
Countermeasure 40 CFR 112

APSA Aboveground Petroleum  
Storage Act California Health & Safety Code (CH &  
SC) 25270 to 25270.13

**Presenter: Dave Boggs**

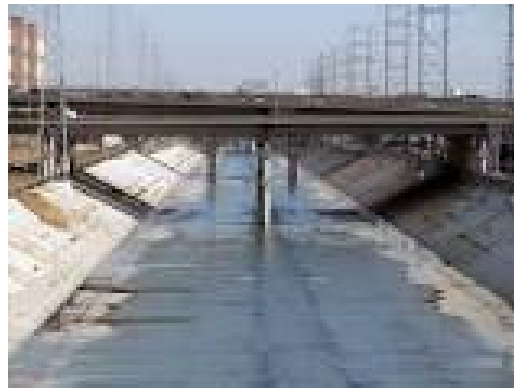
# Applicability - Federal

## Any non-Transportation Facility that handles oil

- Where a spill could impact Navigable Waters
  - Waters of the United States (WOTUS)
- Aboveground Storage Capacity > 1320 gallons OR
  - Only containers  $\geq$  55 gallons count toward total

Completely buried storage capacity of > 42,000 gallons

- Excludes USTs regulated by 40 CFR part 280
- Other Exemptions (hot mix asphalt, homes, milk, others...)



# Applicability - Federal

## Definition of Oil

- Petroleum Oil
- Non-Petroleum Oil - Any other oil including:
  - Fats, oils, and greases of animal, fish, or marine mammal origin
  - Vegetable oils, including oils from seeds, nuts, fruits, and kernels



# Applicability - State

Tank facility meeting requirement of 40 CFR Part 112 (SPCC Rule)

Any facility that stores >1320 gallons of petroleum oil

Any facility with petroleum tank in underground area

## Excludes

- Oil filled Electrical Equipment (transformers)
  - < 10,000 gallons or
  - >10,000 gallons and PCBs < 50 ppm w/ containment & maintenance
- Haz Waste Tanks at DTSC permitted haz waste facility
- USTs regulated by Chapter 6.7 and not located in underground area
- Others

State requires SPCC to be prepared per Federal Guidelines



# SPCC Levels – Qualified Facilities Self Certifying

- Tier 2 Qualified Facilities
  - Total Storage Capacity  $\leq 10,000$  gallons
  - 3 year period prior to self-certifying
    - No single discharge of  $>1,000$  gallons
    - No two discharges in 12 month period  $>42$  gallons  
(Discharge volumes that reach WOTUS)
- Tier 1 Qualified Facilities
  - Meets Tier 2 requirements, and
  - No single tank  $>5,000$  gallons



# SPCC Levels

- Tier 1 Qualified Facilities
  - Can use EPA SPCC Tier 1 Plan Template
  - Self-certification by facility
  - Offers compliance flexibility, engineering restrictions
- Tier 2 Qualified Facilities
  - Prepare “standard” SPCC plan (Cal Fire OSFM Tier II Template)
  - Self-certification by facility
  - Offers some compliance flexibility, engineering restrictions
- Non-Qualified Facility
  - Prepare “standard” SPCC plan, PE certification required

# SPCC Levels – Substantial Harm Criteria

- Substantial Harm Criteria (any of the below)
  - $\geq 42,000$  gallons and over-water transfer of oil

OR

- $\geq 1,000,000$  gallons
  - Lack of Secondary Containment
  - Proximity to fish, wildlife, or sensitive environments
  - Proximity to public drinking water intakes
  - Reportable oil discharge  $\geq 10,000$  gallons in last 5 years
- If potential for Substantial Harm, facilities must submit Facility Response Plan



# Is My SPCC Plan Compliant?



- Complies with detailed rule requirements
- Descriptive facility-specific SPCC Plan
- Plan consistent with field conditions
- Plan implemented as written

## **Spill Prevention Control and Countermeasure (SPCC) Plan**

Cliff's Oil and Donuts  
Main Facility  
1 Glaze Rd  
San Diego, California





# Is my SPCC Plan Compliant?

## How do you know if you have all the key components in your SPCC Plan?

- Use the tools your inspector uses
  - APSA (City of Vernon)
    - APSA Inspection Report
  
- SPCC (EPA)
  - SPCC Field Inspection Checklist for Onshore Facilities
  - <https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/appendix-g-spill-prevention-control-and>



**CITY OF VERNON**  
 Environmental Health Department  
 Certified Unified Program Agency  
 4305 S. Santa Fe Ave., Vernon, CA 90058  
 (323) 583-8811 - ext. 233  
 Aboveground Storage Tank Program  
**OFFICIAL INSPECTION REPORT**

DATE:
COMPLIANCE DATE:
SERVICE:

BUSINESS NAME:		OWNER/OPERATOR:	
ADDRESS:		PHONE NO.:	
H = Chapter 6.67 Cal. Health & Safety Code; F = Title 40 Code of Fed Regs; V = Vemon City Code; L = Violation Level (1-Class I, 2-Class II, M-Minor)			
#	L	VIOLATION CATEGORY & CODE SECTION	CORRECT VIOLATIONS AS FOLLOWS:
1		SPCC Plan prepared - H 25270.4.5	
2		Periodic Inspections - H 25270.4.5, F 112.8	
3		Tank Facility Statement Filed - H 25270.5(a)(1)	
4		Payment of CUPA Fees - H 25270.6(b)	
5		Release Reporting - H 25270.8	
6		SPCC Plan Review/Cert by Engineer - F 112.3(d)	
7		Copy of SPCC Plan Onsite - F 112.3(e)	
8		Submittal of Discharge Info to CUPA - F 112.4	
9		SPCC Plan Amendment after Change - F 112.5(a)	
10		SPCC Plan 5 Year Review - F 112.5(b)	
11		Amendment Implemented within 6 mos - F 112.5(b)	
12		Tech Amendments Certified by Eng. - F 112.5(c)	
13		Drainage Restrained by Valves - F 112.8(b)(1)	
14		Manual Valves for Dilked Areas - F 112.8(b)(2)	
15		Facility Drainage System Retains Oil - F 112.8(b)(4)	
16		H Liquid Level Alarm - F 112.8(c)(6)	
17		Bulk Storage Compatibility with Oil - F 112.8(c)(1)	
18		Drainage of Uncontamed Rainwater - F 112.8(c)(3)	
19		Integrity Test on Regular Sched - F 112.8(c)(6)	
20		Prompt Correction of Discharges - F 112.8(c)(10)	
21		Protective Wrap/Coat Buried Pipes - F 112.8(d)(1)	
22		Cap/Blank Flange Term. Connction - F 112.8(d)(2)	
23		Secondary Containment - V 13.59	
24		QF - Equivalent Plan Prepared - F 112.6(a)(1)	
25		QF - Tchnical Amndments Certified - F 112.6(a)(2)	
26		QF - Failure Analysis Included - F 112.6(a)(3)(i)	
27		QF - Overfill Protection - F 112.6(a)(3)(ii)	
28		QF - Procdres Req'd Insp/Test - F 112.6(b)(1)(iv)	
29		QF - Plan prep 6 mos atr change - F 112.6(b)(2)(ii)	
30		SPCC - Physical Layout & Diagram - F 112.7(a)(3)	
31		SPCC - Oil Type In Containers - F 112.7(a)(3)(i)	
32		SPCC - Dischge Prevnt. Meas. - F 112.7(a)(3)(ii)	
33		SPCC - Dischge/Drainage Cntri - F 112.7(a)(3)(iii)	
34		SPCC - Dischge Countmeasurs - F 112.7(a)(3)(iv)	
35		SPCC - Dispsl of Recvrd Matrial - F 112.7(a)(3)(v)	
36		SPCC - Contact List & Numbers - F 112.7(a)(3)(vi)	
37		SPCC - Procdres to Reprt Dischge - F 112.7(a)(4)	
38		SPCC - Orgnze Plan for Emrgncies - F 112.7(a)(5)	
39		SPCC - Predict Outcome Equip. Failure - F 112.7(b)	
40		SPCC - Security - F 112.7(g)	
41		SPCC - Tank Car/Truck Containment - F 112.7(h)(1)	
42		SPCC - Prvnt Dept. betre Dconnet. - F 112.7(h)(2)	
RECEIVED BY:		(Signature)	
ENVIRONMENTAL HEALTH SPECIALIST:		Phone:	Page 1 of



# Key Components of SPCC Plans

- Engineering-based spill prevention
- Procedure-based spill prevention
- Administrative-based spill prevention



## QUARTERLY HAZARDOUS MATERIAL INSPECTION REPORT

These written procedures and a record of the inspections, signed by the appropriate supervisor or inspector, should be made part of the SPCC and maintained for a period of three years. The designated person must complete this form for each tank on a quarterly or semiannual basis.

Reporting Condition Codes:			
NA = Not Applicable	RM = Needs Routine Maintenance	B = Broken	FR = Frayed
NU = Nothing Unusual	IC = Improvement or Corrected from Last Inspection	CR = Cracked	LI = Labels Inadequate
G = GOOD	O = Other (Explain)	ST = Stained	R = Rusting
N = None or No		S = Secured	P = Peeling
		LK = Leaking	U = Unsecured

Inspection Item:	Observations		
	Condition		Comments and/or Follow-Up Needed
Fuel & Hazardous Materials Storage/Accumulation Area(s)			
Secondary Containment			
a) Discharge Valves			

# Key Components of SPCC Plans

## Engineering Controls

- Facility drainage/ discharge and drainage controls
- Secondary containment & containment impermeability
- Security of oil handling equipment and areas
- Compatibility of materials stored and conditions

# Key Components of SPCC Plans

## Procedural Controls

- Procedures & schedules for tank & equipment inspections
- Integrity testing procedures and schedule
- Description of overfill prevention systems and methods
- Procedures for routine oil handling & transfers
- Containment drainage procedures
- Inspecting and correcting visible leaks
- Discharge notification and response

# Key Components of SPCC Plans

## Administrative

- Regular review of the SPCC Plan
- Required five-year Plan review by facility
- Management approval and commitment
- Plan certification (by a Professional Engineer (PE))
  - Or Self-certified for Qualified Facilities
- Personnel training and annual oil discharge prevention briefings
- Description of how required records will be kept

# Common Pitfalls and Violations

- Procedures identified in plan not implemented at facility
- No plan at all or various implementation failures
- Names and phone numbers out of date
- SPCC Plan not maintained at the facility (or it can't be located)
- No procedures (or reference to or summary of) for routine oil handling, loading/unloading or transfers
- 5 year plan review not done or not documented





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