SPCC Plan Common Findings and Misconceptions

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Agenda

- Introductions
- Safety Moment
- SPCC Regulation Overview
- Common Findings
  - SPCC Plan Narrative
  - Secondary Containment
  - Tank Integrity Testing
  - Record Keeping
- Q&A / Discussion

INTRODUCTIONS

Our team sets itself apart by delivering innovative, client-focused solutions that consistently exceed expectations, blending creativity with deep industry knowledge to drive exceptional results.

Our Team

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Safety Moment

Sun Safety

Springtime is upon! Be sure you are protecting yourself while enjoying the wide wonderful outdoors.

- → Use SPF 30 or higher
- → Apply sunscreen 15-30 minutes before going outdoors
- → Reapply every 2 hours and immediately after swimming or heavy sweating
- → Wear sun-protective clothing like UPF-rated clothing
- → Wear wide-brimmed hats and UV-blocking sunglasses
- → STAY HYDRATED!

SPCC Regulation Overview

SPCC Regulation Overview

Clean Water Act - 1972

- Located in 40 Code of Federal Regulations (CFR) 112
- Purpose is to prevent oil discharges from reaching navigable water
- Requires certain facilities to prepare a SPCC Plan
- Rule finalized in January 2010

SPCC Regulation Overview

Who Needs an SPCC Plan?

- Drills, produces, gathers, stores, processes, refines, transfers, uses or consumes
- Oil and oil products
- Is non-transportation related
- Can be reasonably expected to discharge oil in quantities that may be harmful into or upon the navigable waters of the US or adjoining shorelines
- Meets capacity thresholds
  - Aboveground storage in containers 55 gallons or larger > 1,320 gallons
  - Underground storage > 42,000 gallons and not state-regulated

SPCC Regulation Overview

Navigable Waterways & Common Misconceptions

- Stream, creeks, lakes and ponds
- Storm sewers & combined sewers
- Includes tributaries of navigable waterways including storm sewers and drainage ditches, wetlands
- Cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines of streams, creeks, lakes, and ponds

Common Findings

Common Findings

Secondary Containment

- Critter burrows
- Impermeability
- Inappropriately sized containment
  - Drum spill containment
  - Containment calculations
- Poorly defining the most likely spill scenario
- Stormwater accumulation
- Product accumulation
- Vegetation growing inside containment

Common Findings

Secondary Containment

- Impermeability
  - Cracked secondary containment berm

Common Findings

Secondary Containment

- Impermeability
  - Cracked secondary containment wall

Common Findings

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Common Findings

Secondary Containment

- Impermeability
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Common Findings

Secondary Containment

- Impermeability
  - Vegetation growing in containment

Common Findings

Secondary Containment

- Impermeability
- Structural stability
  - Animal burrows

Common Findings

Secondary Containment

- Impermeability
  - Ant Hills

Common Findings

Secondary Containment

- Containment must be permanent
- Containment size

Common Findings

Secondary Containment

- Containment capacity and Impermeability
  - Items in containment
  - Pop-up containments are not adequate per EPA interpretation

Common Findings

Secondary Containment

- Containment capacity
  - Items inside containment

Common Findings

Secondary Containment

- Containment capacity
  - Undersized containment
  - Wood pallets are not containment pallets

Common Findings

Secondary Containment

- Stormwater in containment
- Allowing spills to accumulate inside secondary containment
- Spills must be promptly cleaned up

Common Findings

Secondary Containment

- Stormwater in containment
- Allowing spills to accumulate inside secondary containment
- Spills must be promptly cleaned up

Common Findings

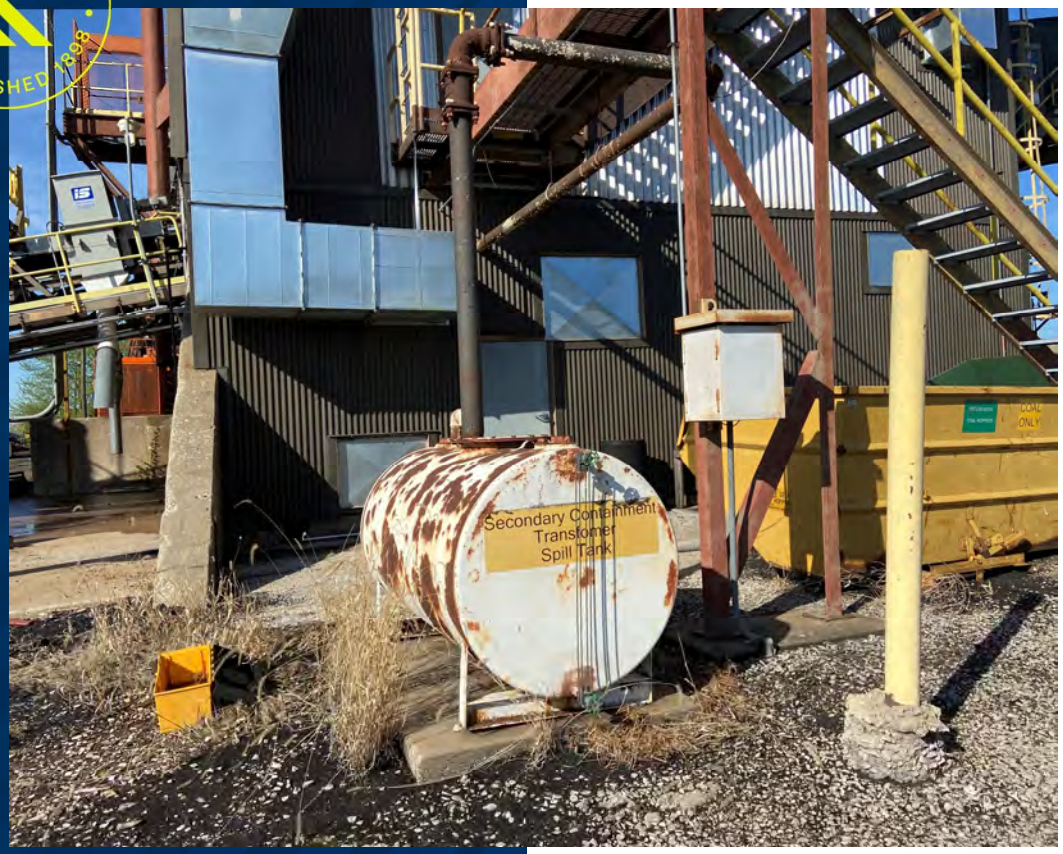
Active Leaks/Nozzles

→ Promptly clean up spills

Common Findings

Tank Integrity Testing Program/Schedule

- STI SP001 is the industry standard for shop fabricated tanks
- Program **should not** reference 2002 EPA memorandum
- Schedule must be defined in SPCC Plan
- Operators can do the monthly and annual inspections
  - Certified inspector every 20 years
- Following examples are of corroded/damaged tanks an individual should be able to identify



Common Findings

Tank Integrity Inspections

- Rust or damage

Common Findings

Tank Integrity Inspections

- Rust or damage

Common Findings

SPCC Plan Content

- Accurately describe how the regulation applies to **YOUR** facility
- Define the most likely spill scenario
  - From a truck loading/offloading area
  - Oil-filled equipment
- No containment calculation documentation

Common Findings

Record Keeping

- Monthly/Annual inspections
  - Must be signed by the inspector
- Annual training
- Stormwater discharge log
- Tank integrity testing (certified) life of tank

Questions and Discussion