

Spill Prevention Countermeasure and Control (SPCC)

Top Five Issues for 2010

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1: Loading/Unloading Area Secondary Containment

- General Secondary Containment
 - Most probable spill scenario
 - Cause of release
 - Rate of release
 - Time to stop release
 - Calculate volume of release

Note: Loading Racks require sized secondary containment

Example

- Hose to facility port
 - Pump rate 20 gpm
 - 30 seconds to shut valve
 - Total 10 gallons release
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- General Secondary requirement is 10 gallons.

Example Loading Area



Example #2: Good or Bad



Business Risk

- Narrowing the most-probably spill to a single point (i.e., the tank port) ignores the potential for spills from the truck.
- If a spill occurs from the truck and oil enters a navigable water or adjoining shoreline, you would be liable.

Active Vs. Inactive Secondary Containment

Inactive - e.g., a permanent trough, berm, etc.
that captures the released oil. Nothing needs to
be done in the event of a release.

Best.

Active – e.g., absorbent pads, pigs, sand in spill kit.
Someone must respond in order to contain the
oil.

Second best

2: Parking Trucks Overnight

- General Secondary Containment is required unless your plan states the trucks will not be parked with oil – ever.
 - Identify the most-probable spill.
 - Where is the oil going to leak from?
 - What Rate?
 - How long before you discover the leak and stop it?
 - What is the volume of oil?

Parking Trucks Overnight

Examples of general secondary containment

- Garage Floor (inactive if the doors have sills)
- Oil pan under the source (active)
- Oil absorbent pads (active)

Truck Parking Overnight



3: Heating Oil Tanks

- Must have sized secondary containment

Heating Oil Tank w/o Containment



4: Site Plan/Diagram

- Please include a diagram with the pathway to water in your SPCC plan.
 - Are you an SPCC facility? (Do not take into account man-made structures)
 - Where can you stop the oil?

5: Records

- Training
- Inspection
- Keep them for 3 years

“Most operators know what they are doing, they’re just not good at documenting it.”

Alex Sherrin Circa 2007

Qualified Facilities

- EPA's 2008 amendments (in effect Jan. 14, 2010)
- QFs must have an SPCC Plan
- Do not require PE to certify the plan

Tier I Facility Eligibility Criteria

- a total aboveground oil storage capacity of 10,000 U.S. gallons or less;
- no aboveground oil storage containers with a capacity greater than 5,000 U.S. gallons; and
- in the 3 years prior to the date the SPCC Plan is certified, had no single discharge of oil to navigable waters or adjoining shorelines exceeding 1,000 U.S. gallons, or no two discharges of oil to navigable waters or adjoining shorelines each exceeding 42 U.S. gallons within any 12-month period.*

Tier II Qualified Facility Eligibility Criteria

- 10,000 gallons or less in aggregate aboveground oil storage capacity
- For the 3 years prior to Plan certification, or since becoming subject to the rule if it has operated for less than 3 years, the facility must not have had:
 - A single discharge of oil to navigable waters exceeding 1,000 U.S. gallons, or
 - Two discharges of oil to navigable waters each exceeding 42 U.S. gallons within any 12-month period

SPCC Template for Tier 1 Facilities

- A Tier I qualified facility would have the option to complete an **SPCC Plan template** (in Appendix G to 40 CFR part 112) in lieu of a full SPCC Plan; or
- <http://www.epa.gov/oem/content/spcc/tier1temp.htm>

Contacts - Any Questions?

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