

# The Federal Spill Prevention, Control, & Countermeasure (SPCC) Rule

## An Environmental Assistance Guide for Vermont



An SPCC regulated facility

Produced by the VT Department of Environmental Conservation's Environmental Assistance Office with assistance from [ECS](#) – providers of business and environmental solutions  
2008



WHERE BUSINESS AND THE  
ENVIRONMENT CONVERGE

## **The Federal Spill Prevention, Control, & Countermeasure (SPCC) Rule**

**An Environmental Assistance Guide for Vermont**



### **Who should use this Guidebook?**

**This Guidebook is intended to assist those facilities with 10,000 gallons or less of oil trying to comply with the Federal SPCC Rule.**

**Facilities with more than 10,000 gallons of oil should contact an environmental consultant for assistance in preparing their SPCC Plans. Refer to the Appendices in this Guidebook for contact information.**

## WHO NEEDS TO COMPLY

### Regulatory Summary

The purpose of the [Spill Prevention, Control & Countermeasure \(SPCC\)](#) rule is to prevent oil discharges into waters of the U.S. This rule is found in the Oil Pollution Prevention regulation (Title 40 of the Code of Federal Regulations, Part 112), which also includes the [Facility Response Plan \(FRP\) rule](#). The focus of the regulation is to prevent the spills, rather than spill contingency measures that are needed after an incident. The SPCC rule is administered and enforced by the federal government from EPA Region I, Boston.

There is no rigid format for an SPCC plan. The guidelines in 40 CFR 112 state the SPCC Plan must be carefully thought out and prepared in accordance with the requirements and good engineering practices. The plan does not have to follow the sequence specified in 40 CFR 112, but it must be at least equivalent and acceptable to the EPA Region I Administrator.

### Ask Yourself:

- Do you use or store petroleum or other oils, or products that contain oil, at your facility?
- Do you use oil to heat the building or any of the equipment at the facility?
- Do you have tanks for oil storage, including heating oil tanks?
- Do you have many containers that are 55-gallon or larger to store oil?

Inadequate outdoor oil drum containment



**If any of the questions applied to you and your facility, you should be aware of the SPCC Rule.**

### An SPCC plan is required if:

**1. A facility that uses or stores oil, but does not transport petroleum as their primary purpose.** This could include industrial, commercial, agricultural, or public facilities. Some examples include: oil storage, oil distributors, power generators, construction sites, marinas, sawmills, printers, airports, vehicle service, salvage yards, farms, solid waste districts, private residence, etc.

and

**1. Aboveground oil storage capacity greater than or equal to 1,320 gallons** (count any container that is 55 gallons or greater) and below-ground oil storage capacity is not 42,000 gallons or greater. You must count the volume of all containers used to store oil, prior to use, or prior to further distribution. Completely buried underground storage tanks (UST) already compliant with the VT Underground Storage Tank regulations do not count.

and

**3. There is a potential that releases of oil from the facility could reach waters of the state.** The definition of “waters of the state” includes all waters used for interstate or foreign commerce, but also includes wetlands, lakes, ponds, wet meadows, etc. Basically any natural surface water in the U.S. is covered under the SPCC rule (as well as the Clean Water Act). These discharges can be from spilling, pumping, pouring, emptying, dumping, emitting, or leaking containers.

**NOTE:**

- 1,320 gallons is equivalent to 24 full 55-gallon drums of oil.
- UST permitted underground tanks are exempt from SPCC.
- You must count the potential storage capacity of all on-site oil containers, whether they contain product or used oil.

**WHAT IS “OIL”**

Oil includes a variety of substances that are petroleum and non-petroleum based. Examples of oils and oil-containing products include, but are not limited to:

<b>Petroleum Based Oils</b>	<b>Non-Petroleum Oils</b>	<b>Oil-containing Products</b>
Gasoline	Animal-based oil	Oil-based paints
Diesel Fuel	Vegetable oil	Oil-based thinners
Motor oil (used or new)	Biofuels	Oil-based inks
Heating oil	Seed oil	Petroleum-based parts
Jet/aviation fuels	Nut oil	Roofing tar
Hydraulic fluid	Fruit & Kernel oils	



**SPCC regulated site**

**The fundamentals of SPCC Plans: Discharge Prevention**

The SPCC Plan should clearly address the following three areas:

1. Operating procedures that prevent oil spills (containment);
2. Control measures installed to prevent a spill from reaching waters of the state; and
3. Countermeasures to contain,

clean up, and mitigate the effects of an oil spill that reaches waters of the state.

## ELEMENTS OF THE SPCC PLAN

Each SPCC Plan, while unique to the facility it covers, must include certain standard elements to ensure compliance with the regulations. These include:

1. **Name of Facility**, description (including: the purpose of the facility and the type of activities conducted, date of initial operation, location, name and address of the owner, designated person responsible for oil discharge prevention) physical layout and a facility diagram as well as a description of the facility that includes the location(s) of the oil storage and handling operations/facilities and its capacities. This will include completely buried tanks that are SPCC exempt, as well as the connecting pipes and transfer stations.

### Facility Diagram Details

The facility diagram must include all transfer stations and connecting pipes and mark the location and contents of each container. It must identify the location of underground storage tanks regulated under the Underground Storage Tanks (UST) regulations. The Facility Diagram should identify these storage facilities as "exempt". Be sure to identify above ground piping from these tanks and how they will be covered under the SPCC Plan.

2. **The type** of oil and storage capacity of each container.
3. **Prevention measures** incorporated at the facility, including items as loading/unloading, and transfers.
4. **Controls** such as secondary containment, and procedures for controlling discharges. A spill Contingency Plan is required as part of the SPCC Plan if a facility is unable to provide secondary containment (e.g., berms, dikes, concrete, plastic basins, etc.) surrounding the oil storage.
5. **Countermeasures** (both those of the facility and those needed from a contractor) for the discovery, response, and cleanup of a spill and the methods of disposal of that recovered material.
6. **Contact lists** and phone numbers of:
  1. Response Coordinator (at your facility)
  2. National Response Center 1-800-424-8802  
[www.nrc.uscg.mil](http://www.nrc.uscg.mil) email: [lst-nrcinfo@comdt.uscg.mil](mailto:lst-nrcinfo@comdt.uscg.mil)
  3. Cleanup contractor(s)
  4. Federal, State, and Local agencies that need to be contacted when a spill occurs
    - i. State Spill Response Team Hotline - office reporting hours: 802 241-3888, 24-hour reporting: 800-641-5005  
[www.anr.state.vt.us/dec/wastediv/spills/spills\\_program.htm](http://www.anr.state.vt.us/dec/wastediv/spills/spills_program.htm)  
The Team is available 24-hours a day, year round. The Team works with First Response organizations and Responsible Parties

to determine if a spill impacts or threatens sensitive receptors such as surface waters or drinking water wells. Department of Environmental Conservation (DEC) Spill Team members oversee the cleanup of a spill, and enforce environmental regulations that are triggered by a spill.

- ii. Local Emergency Planning Committee (LEPC) - [www.dps.state.vt.us/vem/lepc\\_districts.htm](http://www.dps.state.vt.us/vem/lepc_districts.htm) 800-347-0488
- iii. Local fire, police, and ambulance
- iv. CHEMTREC (CHEMical TRANsportation Emergency Center) is dedicated to assisting emergency responders deal with incidents involving hazardous materials (or chemicals), 24-hours/7-days. They provide a resource for emergency responders. 800-262-8200  
[www.chemtrec.org/Chemtrec/Resources/ERG.htm](http://www.chemtrec.org/Chemtrec/Resources/ERG.htm)

7. **Procedures** to report the spill and to relate information, such as:

- 1. 911 physical address & phone number of the facility
- 2. Date and time of the discharge
- 3. Type of material discharged
- 4. Estimate of the total quantity discharged
- 5. Source of the discharge
- 6. Description of all affected natural resources
- 7. Cause of the discharge
- 8. Damages or injuries due to the discharge
- 9. Actions to stop and remove the discharge
- 10. Need for an evacuation
- 11. Names of individuals and organizations that have been contacted



**Improper containment  
note drips**

8. **Organization of the SPCC Plan** so that it is readily usable in the event of a spill.

9. **The potential spill scenarios.** For example, equipment failures when loading or unloading, tank overflow, rupture, or leakage. These will include the potential direction, flow rate, and quantity of oil that could be discharged.

10. **Descriptions of the containment** and/or diversionary structures, processes, and equipment. The entire system, which includes the walls and floors, must be able to contain the oil to a point that it can be cleaned up prior to a discharge. At a minimum, this will include dikes, berms, curbing, retaining walls, culverts, gutters, weirs, booms, spill diversion ponds, retention ponds, sorbent materials, or other drainage systems or barriers. This should also include a written commitment of the equipment and materials needed in the event of a spill, as well as the manpower.

11. **Where containment and/or diversionary structures or equipment are not practical**; periodic integrity and leak testing of bulk containers and associated valves and piping are required along with an Oil Spill Contingency Plan.

12. **Oil Spill Contingency Plan (where appropriate)**

When your facility can not provide adequate containment (or diversionary structures or equipment is not practical) an Oil Spill Contingency Plan must be written. Contact your consultant for more information. The plan requires a written commitment of manpower, equipment and materials required to expeditiously control and remove any *harmful* quantity of oil discharged. Oil Spill Contingency Plans focus on after-the-fact reactive measures. Who may require one? Marina's and oil distribution facilities.

13. **Procedures and records** of periodic integrity and leak testing of bulk containers and associated valves and piping tests or inspections for the SPCC plan. After they are performed by qualified individuals, these documents must be signed by the appropriate party (inspector or supervisor) and kept for a minimum of 3-years.

14. **Employee training** procedures regarding the SPCC plan. Training will be at least annual. An employee needs to be designated who will not only be responsible for discharge prevention, but reports to management at the facility.

15. **Security measures**. These may include; fencing with locked (or guarded) gates, appropriate lighting (to help prevent vandalism, and allow for the



discovery of discharges), security of valves that would allow flow of the oil out of the container, capping or blanking of flanges on the loading/unloading connections (when out of operation or in standby), and security regarding the controls on each oil pump.

Security measures in place

16. **Security to ensure that a tank car or truck loading/unloading operation** will prevent discharge due to unsecured transfer lines, ensure inspection of connections for such operations, and design of a containment system if the drainage area does not flow into a catchment basin or treatment area.

17. **An evaluation procedure** consistent with appropriate engineering standards for an aboveground (field) erected container that has been altered, repaired, reconstructed, or has seen a change of service that could affect the risk of discharge (or failure) due to items such as brittle failure. Appropriate action needs to be taken as the situation dictates.
18. **Examine the regulatory applicability** to the facility.
19. **Written approval / acceptance by management of the SPCC Plan.**  
The owner/operator attests that they are familiar with the rule and have been to the facility. They must also certify:
  1. The Plan has been prepared in accordance with accepted and sound industry practices and with the rule requirements
  2. Procedures for required inspections and testing have been established
  3. The Plan is being fully implemented
  4. The facility meets the qualifying criteria
  5. The Plan does not deviate from rule requirements (except as allowed and as certified by a Professional Engineer - P.E.)
  6. Management approves the Plan and has committed resources to implement it
20. **Certify SPCC Plans.** Facilities with aboveground storage capacity of 10,000 gallons or less have the option to write and self-certify their SPCC plan in lieu of review and certification by a P.E. as long as the facility meets these requirements:
  1. Has 10,000 gallons or less in aggregate aboveground oil storage capacity
  2. The facility must not have had:
    - i. a single discharge of oil to waters of the state exceeding 1,000 gallons, or
    - ii. two discharges of oil to waters of the state each exceeding 42 gallons within any twelve-month period, in the three years prior to the SPCC plan certification date, or since becoming subject to the SPCC rule if the facility has been in operation for less than three years.
21. **Description of spill events / spill history** that occurred in the last year.
  1. The gallon amounts specified (either 1,000 or 42 – as noted in item 20. above) refers to the amount of oil that actually reaches waters of the state or adjoining shorelines, not the total amount of oil spilled.
  2. Oil discharges that result from natural disasters, acts of war, or terrorism *are not* included

3. Facilities that have a reportable oil discharge after self-certifying the SPCC Plan do not automatically lose eligibility
  - i. However, the EPA Regional Administrator has the authority to require a Plan amendment

22. **Amending SPCC plans.** The owner/operator must review the Plan at least every 5 years and produce documentation of the completion of the review and evaluation. An example of such documentation: "I have completed review and evaluation of the SPCC Plan for (name of facility) on (date), and will (will not) amend the Plan as a result."

23. **Certify that a substantial harm analysis has been conducted for the facility.** Is the facility subject to the [Facility Response Plan \(FRP\)](#), and that the plan has been completed. A facility may pose "substantial harm" according to the FRP rule if it:

1. Has a total oil storage capacity greater than or equal to 42,000 gallons and it transfers oil over water to/from vessels; or
2. Has a total oil storage capacity greater than or equal to one million gallons and meets one of the following conditions:
  - i. Does not have sufficient secondary containment for each aboveground storage area
  - ii. Is located at a distance such that a discharge from the facility could cause "injury" to fish, wildlife, and sensitive environments
  - iii. Is located at a distance such that a discharge from the facility would shut down a public drinking water intake
  - iv. Has had, within the past five years, a reportable discharge greater than or equal to 10,000 gallons

Oil spill response training and response drills and exercises for these facilities are required, FRP must include information about self-inspection, drills, exercises, and response training, including descriptions and logs of training and drill or exercise programs and documentation of tank inspections, equipment inspections, response training meetings, response training sessions, and drills and exercises. A facility (such as a marina or other marine transportation activities) that follows the [National Preparedness for Response Exercise Program \(PREP\)](#) will meet EPA's requirements.

## **SPECIAL SECTOR REQUIREMENTS**

In addition to general requirements listed above, the SPCC regulations require spill prevention and control measures specific to the different types of oil facilities or operations, including:



1. Facility Transfer Operations, Pumping, and Facility Process (excluding petroleum production)
2. Onshore Bulk Storage Containers (excluding petroleum production)
3. Onshore Oil Production Facilities
4. Onshore Oil Drilling and Work-over Facilities

Facilities are now required to [submit information](#) after having two or more discharges (over 42 gallons) in any 12-month period or a single discharge of more than 1,000 gallons.

## **WHERE**

A copy of the SPCC Plan must be maintained at the facility. Otherwise, it must be kept at the nearest field office if the facility is not operating at least four hours per day. The SPCC Plan must be available for on-site review and inspection during normal working hours.

## **WHEN TO REPORT A SPILL**

### **The “Sheen Rule”**

- Any facility is subject to reporting requirements if it discharges a harmful quantity of oil to waters of the state, adjoining shorelines, or the contiguous zone
- Harmful quantity of discharged oil
  - Violates state water quality standards
  - Causes a film or sheen on the water’s surface
  - Leaves sludge or emulsion beneath the surface.
- Not based on amount of oil discharged, but instead on the presence of a sheen, sludge, or emulsion

## **COMPLIANCE DATES**

### **Effective Date for Regulatory Revisions**

On July 17, 2002, EPA amended the 1973 SPCC regulations. These amendments included changes of operating requirements and clarification of applicability provisions. Changes went into effect in August 2002, and this Guidance Document reflects those revisions. SPCC Plans were required to be amended to reflect the changes. However, EPA extended the deadline for revising existing SPCC Plans or putting new ones in place. The current deadlines for SPCC Plans are:

- If a facility was in operation on or before August 16, 2002, it may maintain its existing SPCC plan, but must amend it to ensure compliance with amendments to the regulations, on or before July 1, 2009. The amended plan must be implemented as soon as possible and no later than July 1, 2009.

- If a facility became operational between August 16, 2002 and July 1, 2009, and needs to comply with these regulations, it must prepare and fully implement an SPCC plan on or before July 1, 2009.
- If a facility becomes operational after July 1, 2009, an SPCC plan must be prepared and implemented before the facility begins operations.

**What are the compliance dates for facilities (other than farms)?**

<b>A facility (other than a farm) starting operation...</b>	<b>Must...</b>
on or before August 16, 2002	maintain its existing Plan. amend & implement the Plan no later than 07/01/09
after August 16, 2002 through July 1, 2009	prepare and implement a Plan no later than 07/01/09
after July 1, 2009	prepare and implement a Plan before beginning operations

**Facilities that meet the above criteria that were in service on or before August 16, 2002 and do not have SPCC plans are not in compliance.**

**What are the compliance dates for farms/agricultural activities?**

EPA extended the compliance dates for preparing or amending, and implementing SPCC Plans for farms until a rule specifically addressing how they should be regulated under the rule. In the rule, EPA defines a farm as “a facility on a tract of land devoted to the production of crops or raising of animals, including fish, which produced and sold, or normally would have produced and sold, \$1,000 or more of agricultural products during a year.”

<b>A farm starting operation...</b>	<b>Must...</b>
On or before August 16, 2002	Maintain its existing Plan. Amend and implement the Plan when EPA promulgates a rule specific for farms and specifies a compliance date for farms.
After August 16, 2002	Prepare and implement a Plan when EPA promulgates a rule specific for farms and specifies a compliance date for farms.

**SPCC MODEL PLAN**

To best help serve those facilities with low volumes of oil stored onsite and meeting the requirements to “self-certify” we have provided a model plan to

assist. If you are unable to self-certify, you can not use this template and will need to engage a consultant for further assistance.

The Model Plan can be found at: [www.eaovt.org/sbcap/](http://www.eaovt.org/sbcap/)

## **BEST MANAGEMENT PRACTICES**

Look for ways to reduce the quantity of oil and oil products stored at the facility and purchase these materials in containers with less than 55-gallon capacity when possible.

1. Plan and institute procedures to prevent spills before they occur.
2. Provide adequate resources to respond to and minimize the effect of spills that do occur.
3. Train your employees on the proper methods for handling oil.
4. Keep storage containers closed when not actively adding or removing material.
5. When storing drums keep an aisle space between drums to allow for inspection for leaks and damage.
6. Install secondary containment to prevent the release of oil to the environment.
7. Inspect containers and secondary containment structures on a weekly basis to be certain that they are in good condition. Keep written records of these inspections for at least 3 years.
8. Use absorbents for oil spills when there is a threat of the spill spreading to soil or water. Oily absorbents must be evaluated prior to disposal to determine whether they are hazardous.
9. Get receipts for used oil shipments and store them in your records for at least 3 years.

## **ENFORCEMENT**

### **Who Enforces the SPCC Rule?**

Vermont's Agency of Natural Resources (ANR) is usually the primary enforcing agency for environmental regulations. In the case of SPCC regulations, this is not the case; EPA maintains primary enforcement authority.

EPA actively inspects and follows up on spill incidents, pursuing enforcement when non-compliance is found. A facility could be fined \$3,000 (at a minimum) or up to \$157,500.00 for violations found. The option to self-disclose is available.

### **Disclosure (Self-Audit Policy)**

The [EPA Audit Policy](#) formally titled "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations," safeguards human health and the environment by providing several major incentives for facilities to voluntarily come into compliance with federal environmental laws and regulations.

To take advantage of these incentives, a facility must voluntarily discover, promptly disclose, expeditiously correct, and prevent a recurrence of future environmental violations. Generally a facility will discuss the situation with EPA

before going through a formal “disclosure”. This way they can discuss mutually acceptable disclosure details, compliance, and audit schedules.

**COMMON VIOLATIONS**

**Common violations cited by EPA inspection staff:**

- No SPCC Plan in place
- Oil accumulation in secondary containment (and not cleaned)
- Inadequate secondary containment (not sized appropriately or none)
- Inadequate security
- No employee training program in place

**Spills occurring during the loading or unloading procedure have been identified as the number one cause of incidents in the Northeast; particularly during winter months.**

**ASSISTANCE**

**Where can I go for help?**

For more information on SPCC in New England contact:

**EPA Oil Spills / SPCC Enforcement Coordinator**

**EPA New England, 1 Congress Street, Boston, MA 02114-2023  
 EPA Oil Spills / SPCC Enforcement Coordinator  
 617-918-1768 or visit EPA New England’s web site at:  
[www.epa.gov/NE/enforcement/oilspills/index.html](http://www.epa.gov/NE/enforcement/oilspills/index.html)**

For assistance in Vermont on SPCC and other environmental regulations, contact VT Department of Environmental Conservation’s:

**Environmental Assistance Office**

[www.eaovt.org](http://www.eaovt.org)

**1-800-974-9559**

<b>small business compliance assistance (SBCAP)</b>	<b>1-800-974-9559 extension 2</b>	<b>802-241-3745</b>	<b><a href="mailto:judy.mirro@state.vt.us">judy.mirro@state.vt.us</a></b>
<b>municipal compliance assistance (MCAP)</b>	<b>1-800-974-9559 extension 3</b>	<b>802-241-3471</b>	<b><a href="mailto:john.daly@state.vt.us">john.daly@state.vt.us</a></b>

**This fact sheet provides a general overview of rule requirements. It is not all-inclusive. Its purpose is to provide guidance on key provisions so that a facility may recognize potential applicability.**

## **A P P E N D I C E S**

### **VT DEC Links**

VT DEC Environmental Assistance Office (resources found on the [Small Business Compliance Assistance](#) web page) [www.eaovt.org](http://www.eaovt.org)

VT DEC Spills Fact Sheet [www.eaovt.org/sbcap/pdf/fs\\_spills\\_wm.pdf](http://www.eaovt.org/sbcap/pdf/fs_spills_wm.pdf)

VT DEC Burning Used Oil Fact Sheet  
[www.eaovt.org/sbcap/pdf/fs\\_usedoilburning\\_wm.pdf](http://www.eaovt.org/sbcap/pdf/fs_usedoilburning_wm.pdf)

VT DEC Used Oil Fact Sheet [www.eaovt.org/sbcap/pdf/fs\\_usedoil\\_wm.pdf](http://www.eaovt.org/sbcap/pdf/fs_usedoil_wm.pdf)

### **EPA Links**

EPA Oil Pollution Prevention Regulation (40 CFR - Part 112)  
[http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title40/40cfr112\\_main\\_02.tpl](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title40/40cfr112_main_02.tpl)

EPA SPCC Field Inspection & Plan Review Checklist  
[www.epa.gov/emergencies/docs/oil/spcc/guidance/G\\_Bulk\\_Storage\\_Checklist.pdf](http://www.epa.gov/emergencies/docs/oil/spcc/guidance/G_Bulk_Storage_Checklist.pdf)

EPA Guidance for Inspectors  
[www.epa.gov/OEM/content/spcc/spcc\\_guidance.htm](http://www.epa.gov/OEM/content/spcc/spcc_guidance.htm)

EPA New England PowerPoint Presentation goes over the Rule Amendments currently in effect. [www.c2e2.org/arts\\_workshop\\_05/spcc\\_frp\\_pdf.pdf](http://www.c2e2.org/arts_workshop_05/spcc_frp_pdf.pdf)

EPA New England Enforcement  
[www.epa.gov/NE/enforcement/oilspills/index.html](http://www.epa.gov/NE/enforcement/oilspills/index.html)

EPA Office of Emergency Management [www.epa.gov/oilspill](http://www.epa.gov/oilspill)

EPA Superfund, TRI, EPCRA, RMP, and Oil Information Center  
1-800-424-9346 or 703-412-9810 / TDD 1-800-553-7672 or 703-412-3323  
[www.epa.gov/superfund/contacts/infocenter/index.htm](http://www.epa.gov/superfund/contacts/infocenter/index.htm)

EPA Facility Response Plan (Compliance Assistance Guide)  
[www.epa.gov/emergencies/docs/oil/frp/frpguide.pdf](http://www.epa.gov/emergencies/docs/oil/frp/frpguide.pdf)

### **Other Links of Interest**

Federal DOT Emergency Response Guidebook  
<http://hazmat.dot.gov/pubs/erg/gydebook.htm>

CHEMTREC (24-hour Hazmat Communications Center)  
[www.chemtrec.org/Chemtrec/Resources/ERG.htm](http://www.chemtrec.org/Chemtrec/Resources/ERG.htm)

### **Vermont Consultants**

[ECS](#) – Tom Murphy, Sr Scientist - 65 Millet Street, Suite 301, Richmond, VT  
05477 802-434-4500 [tmurphy@ecsconsult.com](mailto:tmurphy@ecsconsult.com) [www.ecsconsult.com](http://www.ecsconsult.com)

Vermont DEC Consultants List

(Note: not all the following consultants can provide SPCC Plan services, please check with them about their services)

[www.anr.state.vt.us/dec/wastediv/sms/pubs/consult.lst.pdf](http://www.anr.state.vt.us/dec/wastediv/sms/pubs/consult.lst.pdf)

### **SPCC Model**

SPCC Model provided by [ECS](#) – providers of business and environmental solutions – you will find the Model at: [www.eaovt.org/sbcap/spcc.htm](http://www.eaovt.org/sbcap/spcc.htm)

### **SPCC PowerPoint**

The PowerPoint presentation will help you understand the regulations and how to comply – using the Model Plan. You will find it at:

[www.eaovt.org/sbcap/spcc.htm](http://www.eaovt.org/sbcap/spcc.htm)

**The VT DEC Environmental Assistance Office wishes to thank ECS for all their efforts in putting together this outreach program.**