

SPCC PLAN - Spill Prevention Control & Countermeasures

SPCC Plan Background

- 40 CFR 112
- Initiated by the Clean Water Act, a Federal Law passed in 1972
- Response to large oil spills that contaminated oceans or rivers
- Meant to protect surface water, but also protects soil and groundwater

Who is considered a farm?

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.

When? - MAY 10, 2013

- Unless your farm was in operation before 2002, then you should already have one in place.
- No enforcement for 180 days after May 10, 2013

Who is required to have a plan?

- Any facility reasonably expected to discharge harmful amount of oil into navigable waters of the U.S.
- Any facility with an aboveground storage capacity of 1,320 gallons of oil

Or

- Any facility with underground storage of more than 42,000 gallons of oil

“Oil” includes

- | | | |
|--|-------------------------------|------------------|
| • Fats | • Petroleum | • Synthetic Oils |
| • Oil or greases of animal, fish or marine mammal origin | • Diesel Fuel | • Mineral Oils |
| • Vegetable oils | • Fuel Oil | • Lube Oil |
| • Crop oil | • Gasoline | • Hydraulic Oil |
| | • Oil refuse, waste or sludge | • Adjuvant Oil |

When determining, Include:

- Any container over 55 Gallons
- Use capacity, not the amount actually in it at the time
- Fuel tanks mounted on trailers, fuel trucks used exclusively on the farm and tanks in pickups
- Transformers
- Both inside and outside containers

But don't include:

- Containers smaller than 55 gallons
- Heating oil used solely for a single family residence
- Milk containing equipment
- Pesticide application equipment
- Permanently closed tanks
- Ammonia tanks or any other non-oil substance

Requirements of the SPCC rule - Requires certain facilities, including farms, to develop and implement a site-specific SPCC plan to address:

- Containment and procedures to prevent oil discharges
- Proactive control measures to keep an oil discharge from entering navigable waters of the US
- Effective countermeasures to contain, clean up and mitigate any oil discharge

Now that you've decided you are an SPCC facility...

Are you Tier I or Tier II?

You are a Tier I Facility if

- Your total capacity is less than 10,000 gallons in aggregate aboveground and,
- for the past 3 years, have not had a significant spill (single discharge of 1,000 gallons or 2 discharges within 12 months of 42 gallons or more each)

Everyone else is Tier II

Tier I facilities

- Tier I facilities may prepare and self-certify their own plan if no container is larger than 5,000 gallons
- Use EPA template on their website <http://www.epa.gov/oem/content/spcc/tier1temp.htm>

Tier II facilities

- Tier II facilities must have plan certified by a licensed professional engineer (P.E.)

The SPCC process

- Evaluate risks
- Prepare an SPCC Plan
- Design improvements for spill prevention and containment
- Implement plan
- Perform training

Where to start:

- With a full inventory of what oil is on your property
- Non-oil substances are not required in your plan, however, if you wanted to add them, you may

An SPCC Plan

- Identifies ways spills might occur
- Describes what has been done to prevent a spill
- Details how to handle a spill

An SPCC plan...

- Does not get submitted to any particular agency unless asked for. It must be available immediately if requested.
- If facility is "manned" 4 hours per day or more, written plan must be kept on site.

Who might ask to see my plan?

- Storm water inspectors
- County agencies
- Watershed commissions
- Waste water treatment plants
- Water treatment plants
- Ohio EPA inspectors
- Federal EPA inspectors
- Etc, etc...

Components of an SPCC plan

All drums, containers and equipment

- Sealed and free from cracks, corrosion, and damage
- Stored upright
- Not sitting directly on the ground to prevent corrosion

Security Procedures

- Fencing
- Lighting
- Internal Communication
- Controlled Entrances/exits and alternate access

Inspection Procedures

Schedule Inspections

- Perform monthly checklist
- Perform annual checklist
- Correct any shortcomings
- Check for integrity of containment structures
- Leaks from pipes, valves, or containers
- Corrosion on pipes and tanks
- Proper drainage from all drains (inside and outside)
- Spill kits are available and stocked
- All tanks and containers are correctly labeled
- Chemicals are in designated areas
- Empty drums are inspected, cleaned, and stored in designated areas only
- Report any discoloration on ground, walls or floors indicating leaks or contamination
- Inspect security systems for signs of vandalism
- Inspect any areas of previous spills

Housekeeping

- Clean up trash, spills, and leaks
- Trash should be collected regularly

Secondary containment:

SPCC Regulations say that any container larger than 55 gallons must have secondary containment sized to hold 110% of the capacity.

- Double walled tanks - Priced around - \$1,700 for a 550-gallon tank, \$3,650 for a 1,000-gallon tank
- Concrete containment or dike
- For an interior location - Spill pallets

Tip – Be sure what you purchase can hold 110% of the largest container stored on it.

But outside - How do you let out the rain while keeping in the oil?

Manual valves - After inspecting accumulated rainwater for sheen, open valve to release water

Problems:

- Must remember to shut valve – good idea to use a locking ball valve
- Must remember to drain containment after rain event

Chemical barriers - There are a number of products available that allow rain and snowmelt to flow freely, but consist of a polymer that reacts with oil to form a solid barrier.

These include:

- Petro-Pipe
- Hydrocarbon flow filters
- CIAgent Barrier Boom

Other mechanical means:

- Oil-water separator
- Various systems with automatic shut off valves
- Pump is shut down when float-activated switch reaches certain position

Your SPCC must give instructions for how to handle a spill

- What spill equipment is on-site
- What personal protective equipment (PPE) is available

- Notification process and phone numbers

Spill Response Kit Contents - Each spill kit should contain:

- Bags of Adsorbent Material
- Rubber Boots
- Gloves
- Disposal Bags and Ties
- Container Overpack
- Safety Glasses
- Hardhats with Face Shields
- Pigs
- Drain covers
- Mats

Reportable spills - This part applies to everyone, whether you are required to have an SPCC plan or not.

What is a REPORTABLE spill?

- 25 gallons or more of oil that gets offsite
- Or an amount that causes a sheen on water in a creek, river, or storm sewer

Spill Notification

Verbal notification of a reportable release must be made within **30 minutes of the discovery of the spill.**

Agencies to report the incident-

VERBAL reports must be made to the following agencies:

- Local Fire Department - 911
- National Response Center - 800-424-8802, or online at www.nrc.uscg.mil/nrchp.html
- Ohio EPA Emergency Response Center - 800-282-9378
- County Emergency Coordinator:

Shelby: 937-492-5635	Darke: 937-548-1444
Logan: 937-593-5743	Mercer: 419-586-6468
Champaign: 937-484-1642	Auglaize: 419-739-6725
Miami: 937-339-6400	

Written notification of reportable release must be made within 30 days of the spill.

Written reportable Spill Notification to:

- Ohio EPA
- County Emergency Coordinator
- Local Fire Department

Training Requirements

- Training is performed annually or whenever a change is made to the plan.
- Training shall be conducted for all new employees of the facility.

RESOURCES

Go here for the EPA SPCC sample plan/template, with text to borrow!

http://www.epa.gov/osweroe1/docs/oil/spcc/sample_plan.pdf

Need help? Go here is an online guide for filling out the SPCC template:

<https://www.asmark.org/mySPCC/>