



What To Expect At An APSA Inspection

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Overview

- Brief History of SPCC Rule
- Introduction to APSA
- Pre Inspection
- Business Plan Review
- Inspection
- Post Inspection
- Common Violations



40 CFR 112: Federal SPCC Rule

- Came into effect in January 1974
- Requirements for prevention, preparedness and response to oil discharges
- Scope of SPCC rule apply to specific non-transportation (facility not exclusively covered by DOT) related facilities
 - Reasonably expected to discharge oil into navigable waters, and
 - Greater than 1,320 gal (only containers with capacity of 55 gal or more), or
 - Have total underground storage capacity greater than 42,000 gal



SPCC Plans and Rules

- APSA references federal standards for SPCC plan
- Must prepare and implement a site-specific SPCC plan
 - Operating, inspection, and testing procedures
 - Containment and control measures
 - Countermeasures and clean up measures



40 CFR 112 Breakdown

- Subpart A – 112.1 – 112.7
 - Applicability, definitions, and general requirements
- Subpart B – 112.8 – 112.11
 - Petroleum oil at on-shore and non-oil production facilities
- Subpart C – 112.12 (not part of APSA)
 - Requirements for animal fats and vegetable oils
- Subpart D – 112.20
 - Facility Response Plan



40 CFR 112 APSA Relevant Sections

- 112.1 – General Applicability
- 112.2 – Definitions
- 112.3 – Requirements to prepare and implement SPCC Plan
- 112.4 – Amendment of SPCC Plan by EPA
- 112.5 – Amendment of SPCC Plan by Owner



40 CFR 112 APSA Relevant Sections

- 112.6 – Qualified Facility Plan Requirements
- 112.7 – General Requirements for SPCC
- 112.8 – SPCC Plan requirements for onshore facilities
- 112.20(e) – Substantial Harm Criteria



APSA

- Under 1989 law, State Water Board and Regional Water Board responsibility for administration
- Due to 2002-2003 financial crisis, responsibilities were shifted and in 2008 AB 1130 transferred responsibilities to UPAs
- Effective 2013 AB 1566 authorized OSFM as the oversight agency for APSA



Assembly Bill 1130

- Facilities with storage capacity of 1,320 gal or more of petroleum to prepare implement SPCC plan
- Inspections at facilities with storage capacity of greater than or equal to 10,000 gal of petroleum every 3 years
- Require inspectors to complete an AST training program



Assembly Bill 2902

- CHSC 25270.2
- SPCC plan require for facilities with less than 1,320 gal storage capacity and one or more Tank in an Underground Area (TIUGA)
- Tank facility with less than 1,320 gal of petroleum may use qualified SPCC template or prepare a full SPCC plan
- Excludes following TIUGA if facility – hydraulic fluid for closed loop mechanical systems, sump, clarifiers, catch basin



SPCC Plan

Federal

- Federal regulated
- Oil in general including non-petroleum oil
- US EPA
- Only applies near navigable waters
- Greater than 1,320 gal

State (APSA)

- California only
- Petroleum oil
- Local CUPA Agency
- Location does not matter
- Greater than or equal to 1,320 gal



Tier I Facilities

- Total aboveground oil storage capacity of 10,000 gal or less
- No aboveground oil storage container greater than 5,000 gal
- No single oil discharge greater than 1,000 gal
- No two discharges greater than 42 gal within any 12 month period
- May use EPA template



Tier I Qualified Facility SPCC Plan

This template constitutes the SPCC Plan for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in §112.3(g)(1). This template addresses the requirements of 40 CFR part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design and construction) and obtain professional assistance, as appropriate.

Facility Description

Facility Name	_____		
Facility Address	_____		
City	State	ZIP	
County	Tel. Number () - _____		
Owner or Operator Name	_____		
Owner or Operator Address	_____		
City	State	ZIP	
County	Tel. Number () - _____		

I. Self-Certification Statement (§112.6(a)(1))

The owner or operator of a facility certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

I _____ certify that the following is accurate:

1. I am familiar with the applicable requirements of 40 CFR part 112;
2. I have visited and examined the facility;
3. This Plan was prepared in accordance with accepted and sound industry practices and standards;
4. Procedures for required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices;
5. I will fully implement the Plan;
6. This facility meets the following qualification criteria (under §112.3(g)(1)):
 - a. The aggregate aboveground oil storage capacity of the facility is 10,000 U.S. gallons or less; and
 - b. The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part

Tier II Facilities

- Total aboveground oil storage capacity of 10,000 gal or less
- Any aboveground oil storage container greater than 5,000 gal
- No single oil discharge greater than 1,000 gal
- No two discharges greater than 42 gal within any 12 month period
- May use OSFM template



Tier II Qualified Facility SPCC Plan

This template constitutes the SPCC Plan (Plan) for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in 40 CFR §112.3(g)(2). This template addresses the requirements of 40 CFR Part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design, and construction) and obtain professional assistance, as appropriate.

Facility Description

Facility Name _____
Facility Address _____
City _____ State _____ ZIP _____
County _____ Tel. Number (____) _____ - _____
Owner or Operator Name _____
Owner or Operator Address _____
City _____ State _____ ZIP _____
County _____ Tel. Number (____) _____ - _____

I. Certification

A. Self-Certification Statement (§112.6(b)(1))

The owner or operator of a facility certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

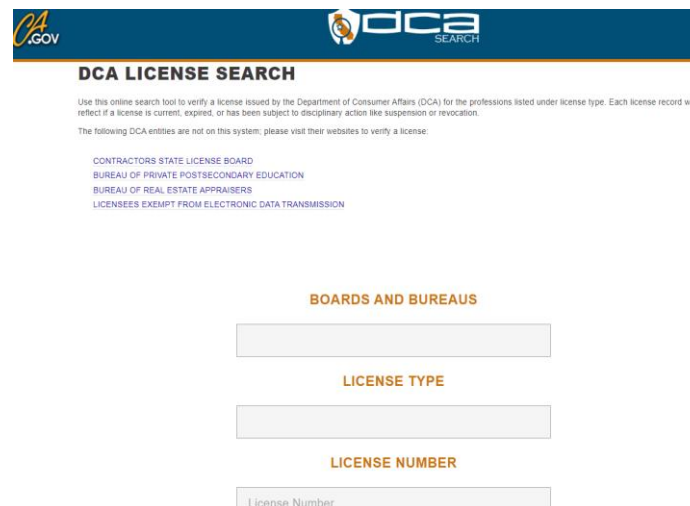
I, _____, certify that the following is accurate:

1. I am familiar with the applicable requirements of 40 CFR Part 112;
2. I have visited and examined the facility;
3. This Plan was prepared in accordance with accepted and sound industry practices and standards, and with the requirements of 40 CFR Part 112;
4. Procedures for required inspections and testing have been established;
5. I will fully implement the Plan;
6. This facility meets the following qualification criteria (under §112.3(g)(2)):



Full Plan Facilities – Non-Qualified

- Typically much longer and more detailed than templates
- Must be PE reviewed and certified
- PE certification does not relieve the owner/operator of duty to prepare and implement Plan



The screenshot shows the 'DCA LICENSE SEARCH' page. At the top, there is a navigation bar with the 'CA.GOV' logo and 'DCA SEARCH'. Below the header, there is a section titled 'DCA LICENSE SEARCH' with a brief description of the search tool. A list of boards and bureaus is provided, including the Contractors State License Board, Bureau of Private Postsecondary Education, Bureau of Real Estate Appraisers, and Licensees Exempt from Electronic Data Transmission. Below this list, there are three input fields labeled 'BOARDS AND BUREAUS', 'LICENSE TYPE', and 'LICENSE NUMBER'. The 'LICENSE NUMBER' field has a small 'License Number' label below it.



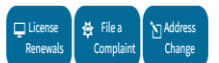
License Lookup (Verification) for California-Licensed Professional Engineers, Land Surveyors, Geologists, and Geophysicists

SEARCH INSTRUCTIONS FOR LICENSE LOOKUP

You can look up the current status of California-licensed professional engineers, land surveyors, geologists, and geophysicists via DCA Search. The link to DCA Search is provided below the Important Notes section.

IMPORTANT NOTES:

License Number Search Field: Enter NUMBERS ONLY without any leading zeroes. Do not enter alphabetical characters. Searching by License Number will locate results for that



APSA Petroleum vs US EPA Oil

- APSA regulates petroleum oil
 - Crude oil or any fraction thereof
 - Liquid at 60 degrees Fahrenheit
 - Synthetic?
- US EPA regulates all types of oil
 - Petroleum
 - Synthetic
 - Animal (including fats and greases)
 - Vegetable (including nut based oil)



Petroleum Under APSA?

- Biodiesel
- Liquefied Petroleum Gas (LPG)
- Asphalt emulsion
- Grease
- Machining coolant
- Mineral oil stored inside drums



APSA Regulated Facilities and Requirements

- Facility has a storage capacity of 1,320 gal or more of petroleum
- One or more tanks meet definition of Tank in Underground Area
- File annual tank facility statement or HMBP electronically to CERS
- Prepare and implement an SPCC plan



Common APSA Regulated Facilities

- Aboveground fueling sites
- Automotive repair shops
- Big warehouses
- Dealerships and heavy equipment yards
- High rise and hospital buildings



Pre Inspection Paperwork

- Review of Business Plan submittal in CERS
- Inspection History
- Reviewing SPCC plan ahead of time?



Facility Information

Submitted Jan. 30, 2023

[Set Submittal Status](#)


Submitted for CERS ID [REDACTED] on 1/30/2023 2:25PM by [REDACTED]

[Business Activities](#)

[Business Owner/Operator Identification](#)



Aboveground Petroleum Storage

Does your facility own or operate aboveground petroleum storage tanks or containers AND: 

- have a total aboveground petroleum storage capacity of 1,320 gallons or more, OR
- have one or more petroleum tanks in an underground area?

Yes



Aboveground Petroleum Storage Act

Submitted Jan. 30, 2023

Set Submittal Status

Submitted for CERS ID [REDACTED] on 1/30/2023 2:25PM by [REDACTED]

 [APSA Facility Information](#) 

 [Aboveground Petroleum Storage Act Documentation: Upload Document\(s\)](#)

Facility Information

Conditionally Exempt 

No

Total Aboveground Storage Capacity of Petroleum 

1712

Number of Tanks in Underground Area(s) 

0

Date of SPCC Plan Certification or Date of 5-Year Review 

7/10/2020



APSA Documentation

You can meet the APSA tank facility statement requirement by either uploading a Tank Facility Statement or by submitting a hazardous materials business plan. To obtain a Tank Facility Statement (fillable PDF) or for APSA Program inquiries, please contact OSFM at cupa@fire.ca.gov

To upload a tank facility statement, select the **Browse** button, locate the file on your computer to upload, provide a document title, and then select **Save & Finish**.

To submit a hazardous materials business plan, you must submit the Facility Information, Hazardous Materials Inventory, Site Map, and Emergency Response and Training Plans submittal elements through CERS. To indicate that you are using the hazardous materials business plan to meet the APSA tank facility statement requirement, select the **Provided Elsewhere in CERS** document option below, select **Hazardous Materials Inventory**, and then click the **Save** button.

Facilities subject to APSA shall keep a copy of their Spill Prevention, Control, and Countermeasure (SPCC) Plan onsite if the facility is normally attended at least four hours per day, or at the nearest field office if the facility is not so attended.

SPCC PLANS ARE NOT REQUIRED TO BE UPLOADED INTO CERS AND, THEREFORE, SPCC PLANS SHOULD NOT BE UPLOADED INTO CERS.

Your local regulator may request additional documentation to be provided if indicated below under "Local Reporting Requirements" information. For additional information, please contact your local regulator.

Document Options

Upload Document(s)

Public Internet URL

Provided Elsewhere in CERS

Provided to Regulator

Stored at Facility

Exempt

Provided Elsewhere in CERS

If requirements for this supplemental documentation can be satisfied by another document you have provided in CERS, please indicate the submittal element where the document can be found and provide the submittal date or other comments to assist your regulator in locating this document in your current/previous CERS facility submittals.

Supplied With...

Facility Information

Hazardous Materials Inventory

Emergency Response and Training Plans

Aboveground Petroleum Storage Act

Comments



**ABOVEGROUND PETROLEUM STORAGE ACT:
TANK FACILITY STATEMENT**

I. IDENTIFICATION

FACILITY NAME (Same as BUSINESS NAME or DBA – Doing Business As):

FACILITY PHONE: _____

FACILITY ADDRESS: _____

FACILITY CITY: _____ STATE: CA ZIP CODE: _____

CONTACT NAME: _____

CONTACT PHONE: _____

II. TOTAL FACILITY STORAGE CAPACITY

Tank facility's total aboveground petroleum storage capacity (in gallons) for all tanks and containers, including tanks in an underground area, with a shell capacity **greater than or equal to** 55 gallons (see instructions for details):

_____ gallons

III. TANK AND CONTAINER DETAILS

Details of each aboveground petroleum storage tank or container **greater than** 10,000 gallons in shell capacity (attach additional forms if needed)

Tank 1:

Tank or Container ID Number: _____

Contents (Gas, Diesel, etc.): _____

Shell Capacity (in gallons): _____

Location of Tank or Container: _____

Tank 2:



















Tank or Container ID Number: _____

Contents (Gas, Diesel, etc.): _____



Hazardous Materials Inventory (25)

Accepted May. 21, 2020

	Common Name	CAS	Location	Max Daily Amount
View	DIESEL FUEL #2  	68476-30-2	COVERED FUEL AREA (5) TANK #1	12,000 gallons
View	DIESEL FUEL #2  	68476-30-2	COVERED FUEL AREA (5) TANK #2	12,000 gallons
View	GASOLINE, PETROLEUM  	8002-05-9	COVERED FUEL AREA (5) TANK #3	4,000 gallons
View	Waste Motor Oil  		MAINTENANCE BUILDING	1,000 gallons
View	Waste Ethylene Glycol  	107-21-1	MAINTENANCE BUILDING	500 gallons
View	ETHYLENE GLYCOL 	107-21-1	Lube Room 1	450 gallons
View	Automatic Transmission Fluid  		Lube Room 1	500 gallons
View	Automatic Transmission Fluid  		Lube Room 2	500 gallons
View	Diesel fuel #2  	68476-34-6	South West Corner of Yard (Generator)	2,900 gallons
View	Oxygen 	7782-44-7	MAINTENANCE BUILDING	537 cubic feet

 = subject to APSA

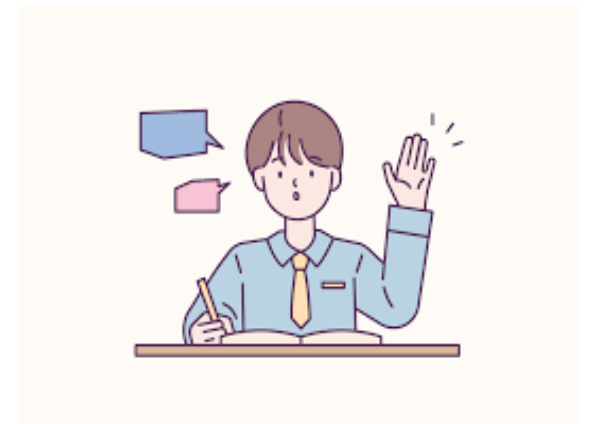
Reviewing Inspection History

- Past compliance inspection reports
- Recalcitrant violations
- Reviewing SPCC plan ahead of time?



Review SPCC Plan Before Inspection

- Benefits:
 - Review SPCC plan in a comfortable environment
 - Take as much time as you need
- Drawbacks:
 - Informed the facility that they are getting an inspection
 - May not be comfortable sending the SPCC plan



Review SPCC Plan During Inspection

- Benefits:
 - Facility staff is present in case you have questions
 - Missing documentation can be found while reviewing the plan
- Drawbacks:
 - Facility staff present which can cause uncomfortableness
 - Time restraint



SPCC Plan Components

- Facility description and certification of plan
- Description of petroleum inventory, location, and equipment
- Prevention measures and control
- Employee training program
- Spill response and notifications
- Tank inspections and testing



Tank Inspections and Testing

- Conduct inspections and tests in accordance to written procedures
- Inspections and testing requirements determined by owner/operator and/or certifying PE
- Common industry standards are STI SP001 and API 653
- Records of inspections and tests kept for minimum of 3 years



STI SPool Tank Categories



STI SP001 Monthly Inspection Checklist

General Inspection Information:

Inspection Date: _____	Prior Inspection Date: _____	Retain until date: _____
Inspector Name (print): _____	Title: _____	
Inspector's Signature _____		
Tank(s) inspected ID _____		
Regulatory facility name and ID number (if applicable) _____		

Inspection Guidance:

- > This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable). Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
- > For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- > The periodic AST inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- > Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
- > Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- > Retain the completed checklists for at least 36 months.
- > After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

	ITEM	STATUS	COMMENTS / DATE CORRECTED
Tank and Piping			
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? <i>Note: If "No", identify tank and describe leak and actions taken.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2	Is the tank liquid level gauge legible and in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

4	Is the primary tank free of water or has another preventative measure been taken? <small>NOTE: Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. N/A is only appropriate for these alternatives.</small>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Saved to this PC
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Equipment on tank			
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? <small>Note: If "No", identify location and describe leak.</small>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containment (Diking/Impounding)			
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
13	Are dike drain valves closed and in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
14	Are containment egress pathways clear and any gates/doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Concrete Exterior AST (CE-AST)			
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Other Conditions			
18	Is the system free of any other conditions that need to be addressed for continued safe operation?	<input type="checkbox"/> Yes <input type="checkbox"/> No	



SPCC Plan Review

- Complete review and evaluation of plan every 5 years
- Must document plan review and evaluation
- Technical amendment for PE certified SPCC plan



SPCC Plan Technical Amendment

- Changes in facility design, construction, operation that affect oil discharge potential at a facility
- Amendment and recertification to plan made within 6 months
- Examples: adding or removing tanks, changing type of oil stored, or alteration of secondary containment



SPCC Plan Administrative Amendment

- Changes that are not related to oil storage, such as personnel changes, phone number changes, policy changes
- Do not require PE to certify, can be made at any time by owner/operator
- Examples: phone numbers and emergency contacts



Safety in the Field

- Wide variety of APSA facilities
- Safety and health hazards to the inspector vary
- Prepare and protect yourself
- Pay attention to your senses and surroundings

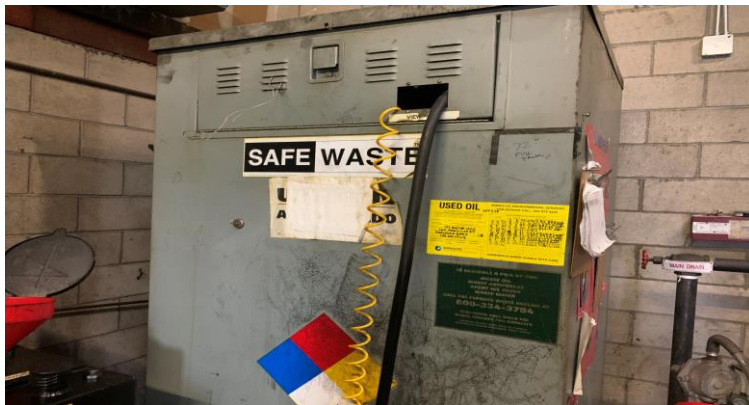


Facility Inspection

- Walkthrough of the facility and learning about the process
- Verifying petroleum equipment and containment methods
- Cross referencing the information in plan matches operations



Oil Lubrication and Fuel Tanks



Mobile Refuelers

- May or may not be subject to APSA based off of operations

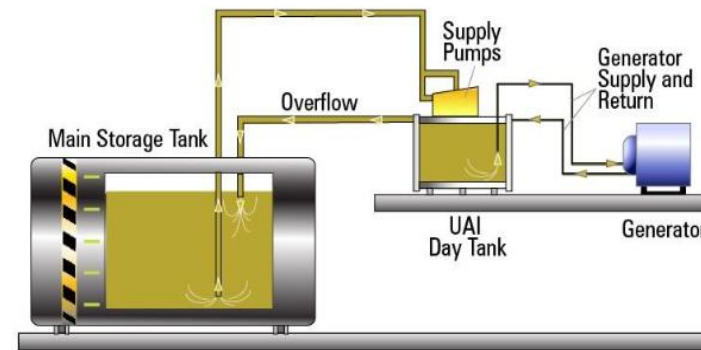


TIUGA

- Must allow for direct viewing of exterior of tank to check for leaks
- Direct viewing not required for double-walled tanks
- Older tank systems may not meet TIUGA requirements



Generator Systems



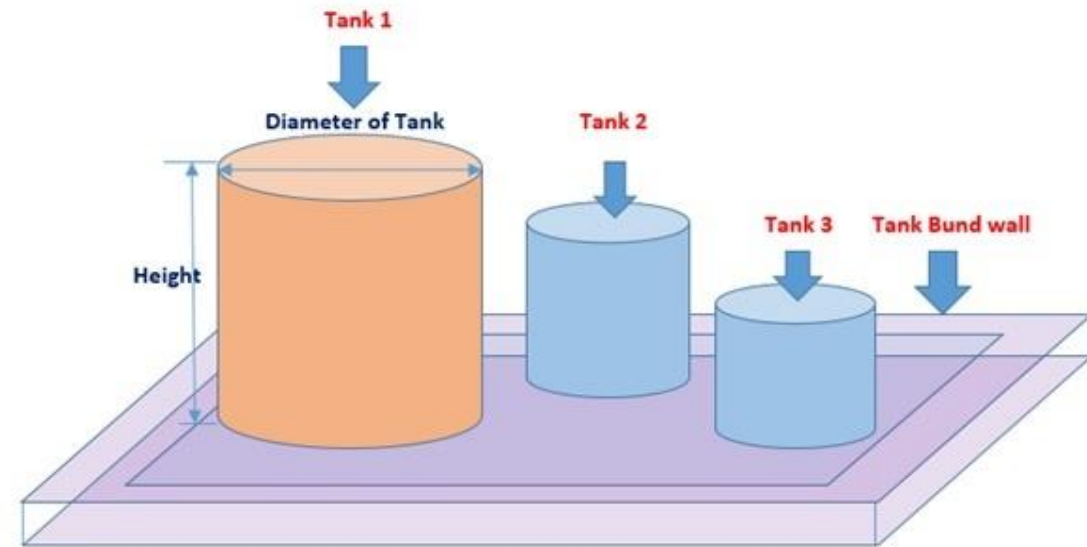
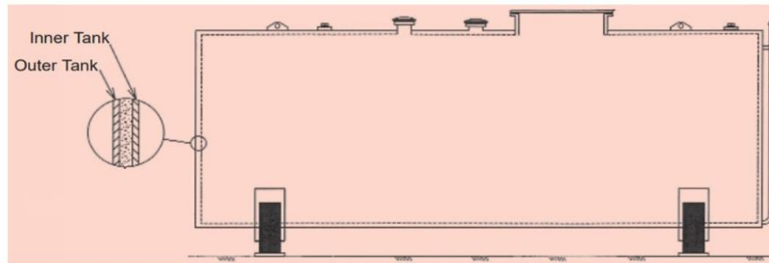
Secondary Containment

- Provides line of defense in the event of failure of primary containment
- Can be accomplished via sized and general containment



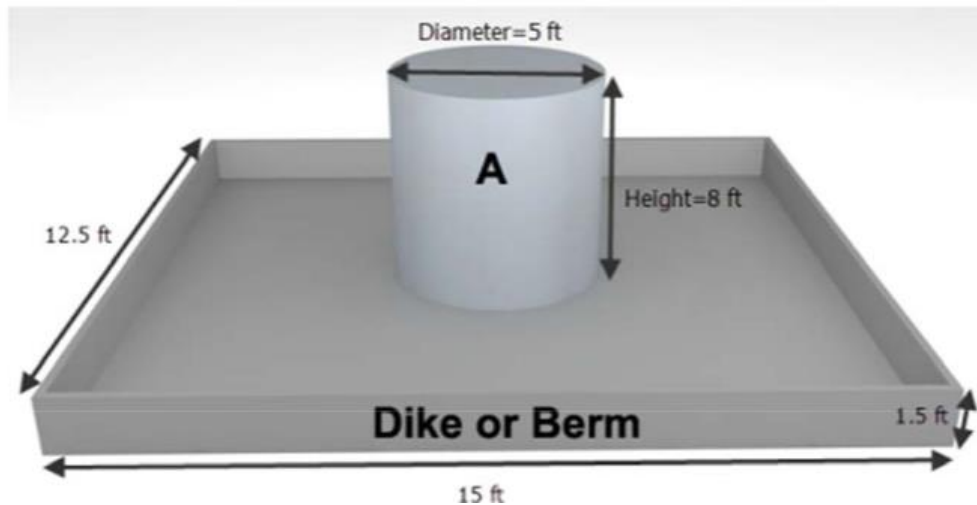
Sized Secondary Containment

- Address potential of discharges at oil handling and storage areas
- Requirement for bulk storage tanks and containers
- Contain largest single oil container plus sufficient freeboard



Containment Calculation #1

1,200 gal tank shell capacity



Volume of secondary containment
 $15 * 12.5 * 1.5 = 281.3$ cubic feet

Volume of tank
 $1200 \text{ gal} * 0.1337 \text{ cubic feet/gal}$
 $= 160.4$ cubic feet

% of secondary containment volume
 $281.3 / 160.4 = 1.75$
 $1.75 * 100 = 175 \%$

**General Information**

- Homepage
- Progress Reports
- FAQ
- Glossary

Precipitation Frequency

- Data Server
- GIS Grids
- Maps
- Time Series
- Temporals
- Documents

Probable Maximum Precipitation Documents**Miscellaneous**

- Publications
- Storm Analysis
- Record Precipitation

Contact Us Inquiries**NOAA ATLAS 14 POINT PRECIPITATION FREQUENCY ESTIMATES: CA****Data description**

Data type: Units: Time series type:

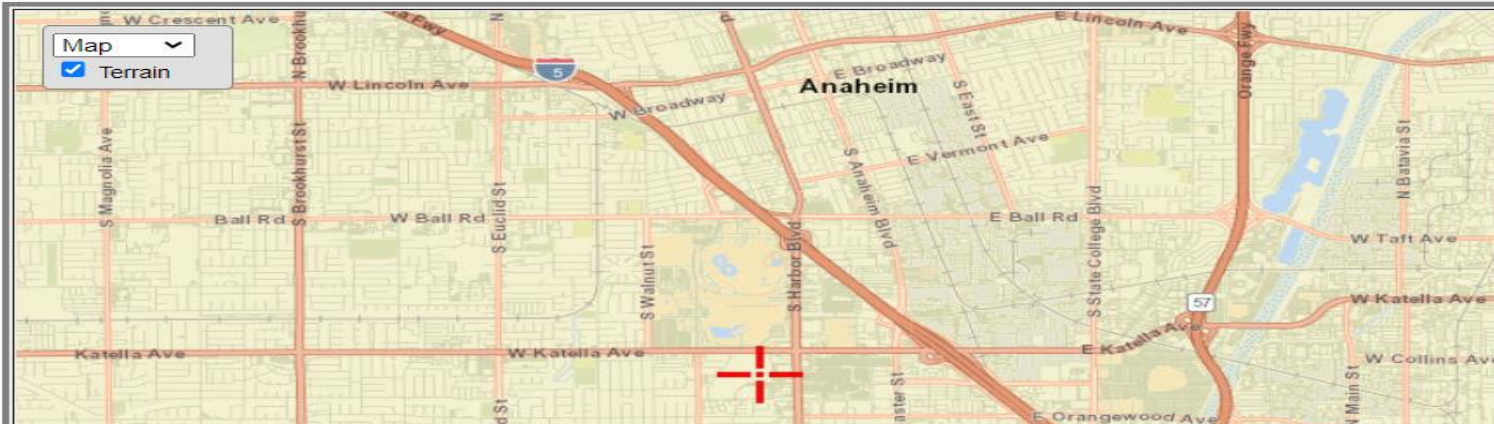
Select location**1) Manually:**

a) **By location** (decimal degrees, use "-" for S and W): Latitude: Longitude:

b) **By station (list of CA stations):**

c) **By address**

2) **Use map** (if ESRI interactive map is not loading, try adding the host: <https://js.arcgis.com/> to the firewall, or contact us at hdsc.questions@noaa.gov):



Map
 Terrain

a) Select location

Move crosshair or double click

b) Click on station icon

Show stations on map

Location information:

Name: Anaheim, California, USA*
Latitude: 33.8007°
Longitude: -117.9184°
Elevation: 128.9 ft **



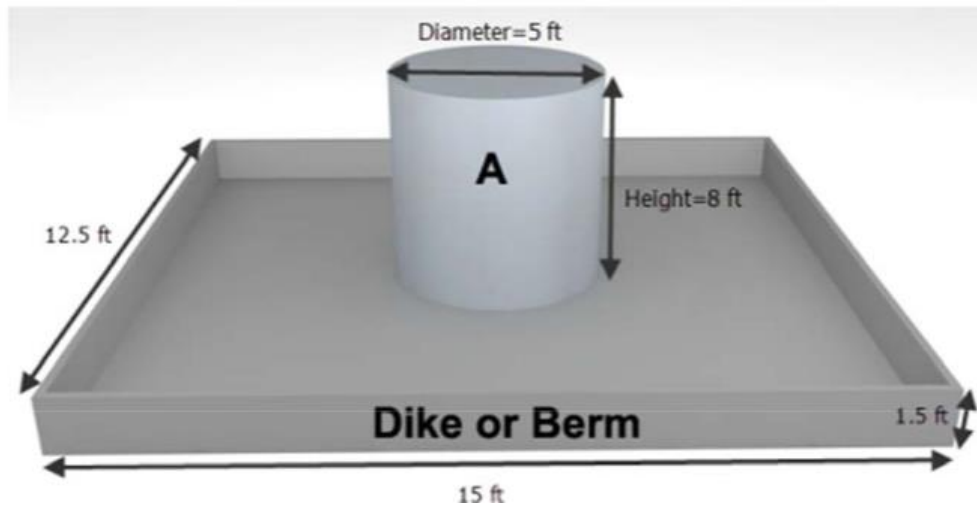
PDS-based precipitation frequency estimates with 90% confidence intervals (in inches)¹

Duration	Average recurrence interval (years)									
	1	2	5	10	25	50	100	200	500	1000
5-min	0.126 (0.106-0.152)	0.163 (0.137-0.197)	0.212 (0.177-0.257)	0.252 (0.209-0.308)	0.308 (0.246-0.389)	0.351 (0.274-0.454)	0.395 (0.301-0.525)	0.441 (0.326-0.604)	0.504 (0.356-0.721)	0.554 (0.377-0.821)
10-min	0.181 (0.152-0.218)	0.234 (0.196-0.282)	0.304 (0.254-0.368)	0.362 (0.299-0.442)	0.441 (0.352-0.558)	0.503 (0.393-0.651)	0.567 (0.431-0.752)	0.632 (0.467-0.865)	0.723 (0.511-1.03)	0.794 (0.540-1.18)
15-min	0.219 (0.183-0.263)	0.283 (0.237-0.341)	0.368 (0.307-0.445)	0.437 (0.362-0.534)	0.534 (0.426-0.675)	0.608 (0.475-0.787)	0.685 (0.521-0.910)	0.765 (0.565-1.05)	0.874 (0.617-1.25)	0.960 (0.654-1.42)
30-min	0.302 (0.253-0.363)	0.390 (0.327-0.470)	0.507 (0.423-0.614)	0.604 (0.500-0.737)	0.736 (0.588-0.932)	0.840 (0.656-1.09)	0.945 (0.719-1.26)	1.06 (0.779-1.44)	1.21 (0.852-1.73)	1.33 (0.902-1.97)
60-min	0.423 (0.354-0.509)	0.547 (0.458-0.659)	0.711 (0.593-0.860)	0.846 (0.700-1.03)	1.03 (0.824-1.31)	1.18 (0.919-1.52)	1.33 (1.01-1.76)	1.48 (1.09-2.02)	1.69 (1.19-2.42)	1.86 (1.26-2.75)
2-hr	0.612 (0.513-0.737)	0.792 (0.663-0.955)	1.03 (0.857-1.24)	1.22 (1.01-1.49)	1.48 (1.18-1.87)	1.68 (1.31-2.17)	1.88 (1.43-2.50)	2.09 (1.54-2.86)	2.37 (1.68-3.39)	2.59 (1.76-3.84)
3-hr	0.760 (0.637-0.916)	0.983 (0.823-1.19)	1.27 (1.06-1.54)	1.51 (1.25-1.84)	1.83 (1.46-2.31)	2.07 (1.62-2.68)	2.32 (1.76-3.08)	2.57 (1.90-3.52)	2.91 (2.06-4.16)	3.17 (2.16-4.71)
6-hr	1.07 (0.894-1.29)	1.38 (1.15-1.66)	1.78 (1.49-2.16)	2.11 (1.75-2.58)	2.55 (2.04-3.23)	2.89 (2.26-3.74)	3.23 (2.46-4.29)	3.58 (2.65-4.90)	4.06 (2.87-5.80)	4.42 (3.01-6.56)
12-hr	1.39 (1.16-1.67)	1.79 (1.50-2.16)	2.32 (1.94-2.81)	2.76 (2.28-3.37)	3.35 (2.68-4.24)	3.81 (2.97-4.93)	4.28 (3.25-5.68)	4.76 (3.51-6.51)	5.42 (3.83-7.74)	5.93 (4.04-8.79)
24-hr	1.84 (1.63-2.13)	2.39 (2.11-2.76)	3.12 (2.75-3.62)	3.72 (3.25-4.35)	4.55 (3.85-5.49)	5.20 (4.31-6.40)	5.87 (4.75-7.40)	6.56 (5.17-8.50)	7.52 (5.69-10.1)	8.27 (6.05-11.5)
2-day	2.23 (1.97-2.57)	2.94 (2.59-3.39)	3.87 (3.41-4.49)	4.64 (4.06-5.42)	5.70 (4.82-6.87)	6.52 (5.40-8.02)	7.36 (5.96-9.27)	8.23 (6.48-10.7)	9.42 (7.13-12.7)	10.4 (7.57-14.4)
3-day	2.49 (2.20-2.87)	3.32 (2.93-3.84)	4.42 (3.89-5.12)	5.32 (4.65-6.21)	6.55 (5.54-7.90)	7.50 (6.22-9.23)	8.47 (6.86-10.7)	9.48 (7.46-12.3)	10.8 (8.20-14.6)	11.9 (8.71-16.6)
4-day	2.67 (2.36-3.09)	3.59 (3.17-4.15)	4.81 (4.24-5.57)	5.81 (5.07-6.78)	7.17 (6.07-8.65)	8.22 (6.82-10.1)	9.30 (7.53-11.7)	10.4 (8.21-13.5)	11.9 (9.04-16.1)	13.1 (9.61-18.3)
7-day	3.04 (2.69-3.51)	4.09 (3.61-4.73)	5.49 (4.84-6.36)	6.66 (5.82-7.78)	8.27 (7.00-9.98)	9.54 (7.91-11.7)	10.9 (8.79-13.7)	12.2 (9.63-15.8)	14.1 (10.7-19.1)	15.6 (11.4-21.8)
10-day	3.28 (2.90-3.79)	4.41 (3.89-5.10)	5.94 (5.23-6.88)	7.22 (6.31-8.43)	9.02 (7.63-10.9)	10.4 (8.66-12.9)	11.9 (9.66-15.0)	13.5 (10.6-17.5)	15.7 (11.9-21.2)	17.5 (12.8-24.4)
20-day	3.91 (3.45-4.51)	5.28 (4.67-6.11)	7.18 (6.32-8.32)	8.79 (7.68-10.3)	11.1 (9.38-13.4)	12.9 (10.7-15.9)	14.9 (12.1-18.8)	17.0 (13.4-22.0)	19.9 (15.1-26.9)	22.3 (16.4-31.2)
30-day	4.59 (4.06-5.30)	6.23 (5.50-7.20)	8.49 (7.48-9.84)	10.4 (9.12-12.2)	13.2 (11.2-15.9)	15.5 (12.8-19.0)	17.9 (14.5-22.5)	20.4 (16.1-26.5)	24.1 (18.2-32.5)	27.1 (19.8-37.8)
45-day	5.39 (4.76-6.22)	7.31 (6.45-8.44)	9.98 (8.79-11.6)	12.3 (10.7-14.3)	15.6 (13.2-18.8)	18.3 (15.1-22.5)	21.1 (17.1-26.6)	24.2 (19.1-31.3)	28.6 (21.6-38.6)	32.2 (23.6-44.9)
60-day	6.25 (5.52-7.21)	8.44 (7.46-9.76)	11.5 (10.1-13.3)	14.1 (12.4-16.5)	17.9 (15.2-21.6)	21.0 (17.4-25.9)	24.3 (19.7-30.6)	27.8 (21.9-36.0)	32.9 (24.9-44.3)	37.0 (27.0-51.5)



Containment Calculation #2

1,200 gal tank shell capacity



Convert 4.55 inches to ft = 0.3791 ft

Volume of rain to be contained in secondary containment

(rainfall * area of berm)

$$0.3791 \text{ ft} * 187.5 \text{ ft squared} = 71.081 \text{ cubic feet}$$

Total Containment Required

(volume of rain contained + volume of tank)

$$71.081 \text{ cubic feet} + 160.4 \text{ cubic feet} = 231.481 \text{ cubic feet}$$

General Secondary Containment

- Address most likely oil discharges from all regulated parts of facility
- Areas or containers such as mobile refuelers



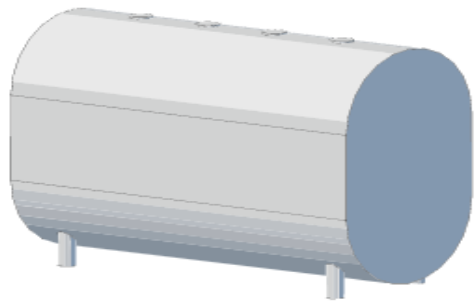
Overfill Prevention

- Implementation to avoid discharges
- In person monitoring of filling process
- High level alarms with audible or visual signal
- High level shut off valves to stop flow at set level





275 Gallon (Vertical) Oil Tank Level Chart



Length:
60 Inches
Width:
27 Inches
Height:
44 Inches

Inches	Gallons	Inches	Gallons	Inches	Gallons
1"	2	16"	94	31"	201
2"	5	17"	101	32"	209
3"	9	18"	108	33"	216
4"	14	19"	115	34"	223
5"	19	20"	123	35"	230
6"	25	21"	130	36"	236
7"	31	22"	137	37"	243
8"	37	23"	144	38"	249
9"	44	24"	151	39"	254
10"	51	25"	158	40"	260
11"	58	26"	166	41"	265
12"	65	27"	173	42"	269
13"	72	28"	180	43"	272
14"	80	29"	187	44"	275
15"	87	30"	194	-	-



Tanks Exempted Under APSA - HSC 25270.2(a)

- Pressure vessel or boiler
- Hazardous waste tank under permit with DTSC or PBR authorization from UPA
- Aboveground oil production tank
- Oil-filled electrical equipment
- Tank regulated as a UST
- Transportation-related tank facility
- Tank or tank facility located on and operated by a farm exempt from federal SPCC requirements
- TIUGA less than 55 gal



USTs as ASTs

- Not designed for AST usage
- Seek assistance from specialists or tank engineers



CERS Business

Unified Program Violation Library

[CERS Data Registry](#) » [Unified Program Violation Library](#)

Instructions/Help

The Unified Program Violation Library is a repository of standard violation descriptions Unified Program Agencies (UPAs) may use in their field inspections, and **must** be used by Unified Program Agencies (UPA) when reporting violation detail data to the California Environmental Reporting System (CERS). UPAs must either report violation information directly into the CERS user interface or via machine-to-machine electronic data transfer (EDT). The violation library is reviewed and modified as necessary on an annual basis, using the [change management process](#). For more information about the Unified Program Violation Library please contact CalEPA Unified Program at CUPA@calepa.

The Unified Program Violation Library serves as a compilation of common violations for consistent reporting purposes only. The Unified Program Violation Library is not an exhaustive list of all violations and the inclusion, or non-inclusion, of any specific violation implies nothing and shall be construed as a policy statement, interpretation or guidance from CalEPA or any of its Boards, Departments or Offices. The Unified Program Violation Library is not a legal document containing any advice, and under no circumstances shall the State of California be liable for any actions taken or omissions made from reliance on any information contained herein.

[CERS Central Home Page](#)

Violation Name	<input type="text"/>	Violation Description	<input type="text"/>	<input type="button" value="Search"/>
Violation Type Number	<input type="text"/>	Violation Source	<input type="text" value="v"/>	
Violation Program	APSA Program v	Violation Category	Select a Program v	
Begin Date Greater Than	<input type="text" value=""/>	End Date Less Than	12/30/2099 <input type="text" value=""/>	

Drag a column header and drop it here to group by that column

	Name	Program	Description	Type #	Begin Date	End Date
<input type="button" value="View"/>	General	APSA Program	APSA Program - Administration/Documentation - General	4010	7/1/2011	12/31/2099
<input type="button" value="View"/>	SPCC Plan prepared	APSA Program	Failure to prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan.	4010001	11/1/2017	12/31/2099
<input type="button" value="View"/>	Professional engineer certification	APSA Program	Failure to have a licensed professional engineer properly review and certify the SPCC Plan.	4010003	6/1/2016	12/31/2099
<input type="button" value="View"/>	Impracticability claims of appropriate containment explained and certified	APSA Program	Failure to clearly explain why appropriate containment/diversionary structures are not practicable and/or SPCC Plan claiming impracticability is not certified by a licensed professional engineer.	4010004	11/1/2017	12/31/2099



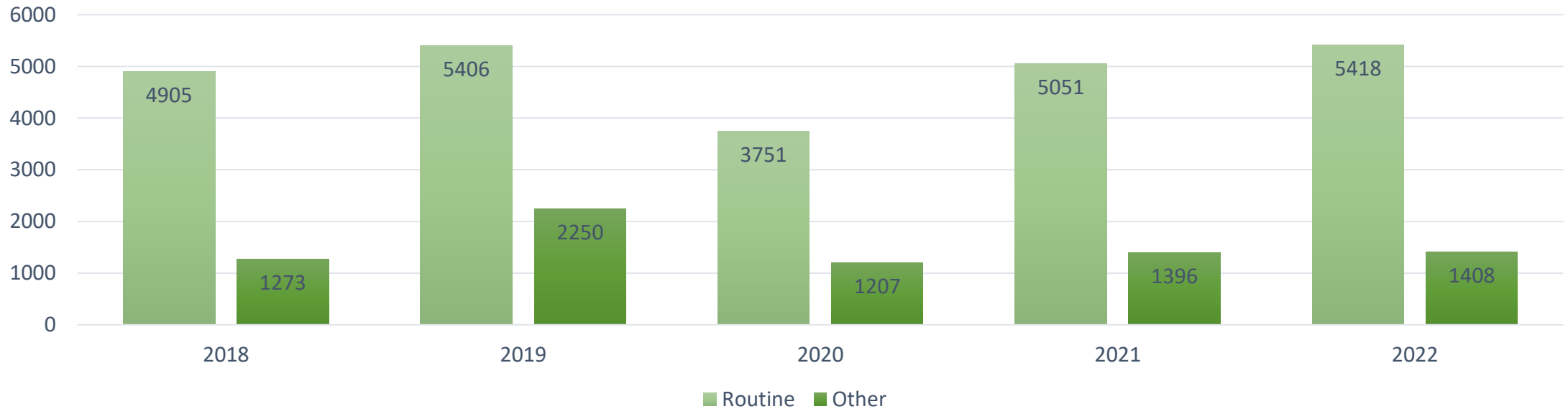
Violation Elements

- Identifying the violation as Minor, Class II, or Class I
- Explaining the evidence that supports the violation
- Providing corrective action requirements
- Establishing and documenting compliance



Inspections Conducted

2018 – 2022 Inspections



Violations Cited

2018 – 2022 Violations



2022 APSA Inspection Data

- Inspections conducted – 6515
- Violations cited – 6237
- Violation Categories:
 - Abandonment/illegal disposal/unauthorized treatment – 0 violations cited
 - Administration/documentation – 3920 violations cited
 - Operations/maintenance – 1451 violations cited
 - Release/leaks/spills – 63 violations cited
 - Training – 803 violations cited



Top 10	Number	Name	Category	Citation
10	4010041	Oil type and storage capacity of storage containers	Administration and Documentation	CHSC 25270.4.5(a) 40 CFR 112.7(a)(3)(i)
9	4030014	Tanks inspected or tested by qualified person	Operations and Maintenance	CHSC 25260.5.5(a) 40 CFR 112.7(e), 112.8(c)(6)
8	4010008	SPCC Plan available onsite	Administration and Documentation	CHSC 25270.4.5(a) 40 CFR 112.3(e)(1)
7	4010032	Annual tank facility statement	Administration and Documentation	CHSC 25270.4.5(a). 25270.6(a)(2)
6	4030015	Tank inspected an/or integrity tested	Operations and Maintenance	CHSC 25270.4.5(a) 40 CFR 112.7(e), 112.8(c)(6)



Top 10	Number	Name	Category	Citation
5	4010001	SPCC Plan prepared	Administration and Documentation	CHSC 25270.4.5(a) 40 CFR 112.3, 112.6
4	4010009	Five year SPCC Plan review and documentation	Administration and Documentation	CHSC 25260.5.5(a) 40 CFR 112.5(b)
3	4020002	Spill prevention briefings	Training	CHSC 25270.4.5(a) 40 CFR 112.7(f)(3)
2	4020001	Employee training requirements	Training	CHSC 25270.4.5(a) 40 CFR 112.7(f)(1)
1	4010021	Written records of inspections and tests	Administration and Documentation	CHSC 25270.4.5(a) 40 CFR 112.7(e), 112.8(c)(6)



APSA Inspection Summary

- Verify facility has a current SPCC plan
- Review and ensure the plan is appropriate for operations
- Technical amendments are certified and documented
- During inspection make sure appropriate containment provided
- Inspections of tanks are conducted
- Spills/leaks in secondary containment are promptly cleaned up
- All aspects of SPCC plan are being implemented



APSA FAQ

- I already submit a HMBP, do I still need an SPCC Plan?
- Can a business with multiple facilities/locations have a single SPCC plan?
- Are ASTs that are empty or no longer in service still regulated required to be included in a facility's SPCC Plan?
- If facility has a 4,000 gal petroleum AST and a 7,000 gal edible oil AST, do I need a PE certified SPCC plan?



Additional Resources for APSA

- [Board of Professional Engineers, Land Surveyors, and Geologists](#)
- [California CUPA Forum Board](#)
- [CalOES Spill Reporting](#)
- [CERS Violation Library](#)
- [Department of Consumer Affairs](#)
- [EPA Secondary Containment Calculation](#)



Additional Resources for APSA

- [OSFM Farm Guidance](#)
- [OSFM Guidance Document](#)
- [OSFM Website](#)
- [SPCC EPA Guidance Document](#)
- [SPCC Tier I Template](#)
- [SPCC Tier II Template](#)





Questions?

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