

# What to Expect When ... Implementing SPCC Plans

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26th California Unified Program  
Annual Training Conference  
February 26-29, 2024

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# Poll Question 1:

How do you interact with SPCC Plans?



# Course Overview

- ▶ Non-Qualified Facility vs. Qualified Facility SPCC Plans
- ▶ SPCC Plan Implementation
  - Training
  - Integrity Inspections
  - Oil Spill Response
- ▶ 5-Year SPCC Reviews and Amendments
  - Process
  - Examples
  - Timeline



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# Poll Question 2:

What aspects of SPCC Plan implementation would you like to learn more about?



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# Qualified Facilities

- ▶ Non-Qualified Facilities (Tier I and Tier II) Criteria
  - Less than 10,000 gallons of aboveground oil storage
  - In the past 3 years has not had:
    - A single discharge of 1,000 gallons of oil or
    - Two discharges of 42 gallons of oil within one year



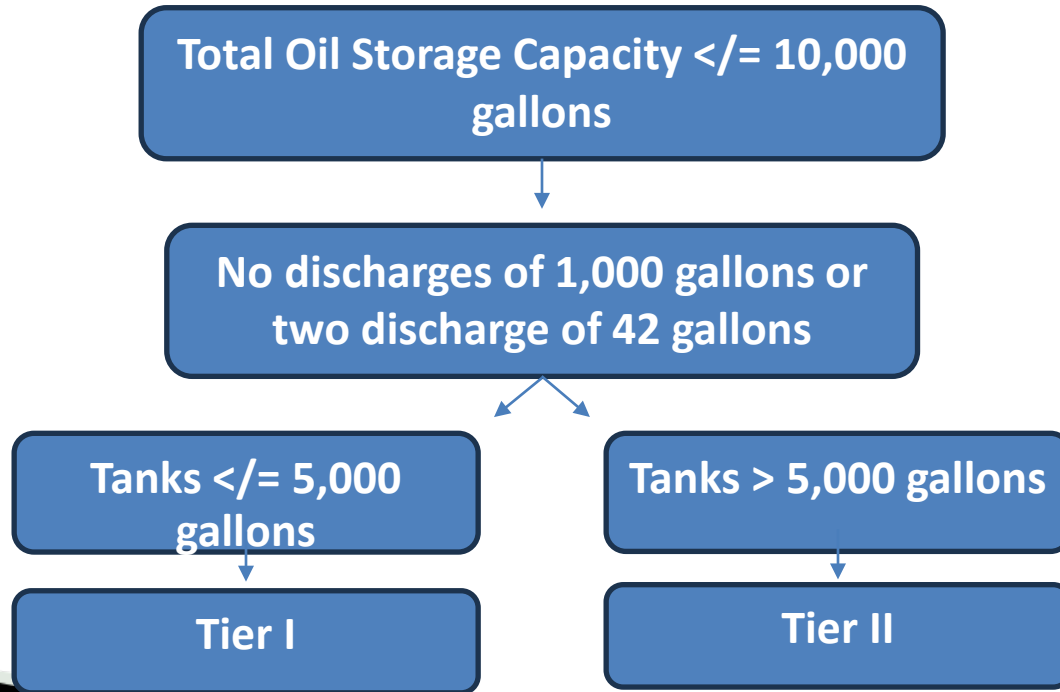
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# Qualified Facilities

- ▶ Discharge Definition 40 CFR 112.1(b)
  - Release oil that may be harmful into or upon the navigable waters of the United States or adjoining shorelines
  
- ▶ Discharges that “may be harmful” 40 CFR 110.3
  - Violate applicable water quality standards
  - Cause a film or sheen
  - Cause a sludge or emulsion to be deposited



# Qualified Facilities





# Qualified Facilities

## ▶ Tier I Qualified Facilities 40 CFR 112.6(a)

May prepare and implement SPCC Plan following:

- [Tier I template](#) from Appendix G to part 112;
- [Tier II template](#) from Office of the State Fire Marshal;
- Equivalent SPCC Plan with cross-section reference; or
- PE Certified SPCC Plan.



# Poll Question 3:

Have you prepared an SPCC Plan with the Tier I Template?



# Qualified Facilities

## ▶ Tier I Self-Certification

- You are familiar with the applicable requirements of [40 CFR part 112](#);
- You have visited and examined the facility;
- You prepared the Plan in accordance with accepted and sound industry practices and standards;
- You have established procedures for required inspections and testing in accordance with industry inspection and testing standards or recommended practices;
- You will fully implement the Plan;
- The facility meets the qualification criteria in [§ 112.3\(g\)\(1\)](#);
- The Plan does not deviate from any requirement of this part as allowed by [§ 112.7\(a\)\(2\)](#) and [112.7\(d\)](#) or include measures pursuant to [§ 112.9\(c\)\(6\)](#) for produced water containers and any associated piping; and
- The Plan and individual(s) responsible for implementing this Plan have the approval of management, and the facility owner or operator has committed the necessary resources to fully implement this Plan.



# Qualified Facilities

## ▶ Tier II Self-Certification

- You are familiar with **the requirements of this part**;
- You have visited and examined the facility;
- You prepared the Plan in accordance with accepted and sound industry practices and standards, **and with requirements of this part**;
- ~~You have established~~ Procedures for required inspections and testing **have been established** ~~in accordance with industry inspection and testing standards or recommended practices~~;
- You will fully implement the Plan;
- The facility meets the qualification criteria in [§ 112.3\(g\)\(2\)](#);
- The Plan does not deviate from any requirement of this part as allowed by [§ 112.7\(a\)\(2\)](#) and [112.7\(d\)](#) or include measures pursuant to [§ 112.9\(c\)\(6\)](#) for produced water containers and any associated piping, **except as provided in paragraph (b)(3) of this section**; and
- The Plan and individual(s) responsible for implementing this Plan have the approval of management, and the facility owner or operator has committed the necessary resources to fully implement this Plan.



# Qualified Facilities

- ▶ Tier II Qualified Facility
  - Prepare a self-certified Plan which meets Tier II EPA regulatory requirements
  - A [Tier II template](#) from Office of the State Fire Marshal (OSFM) is available to the public



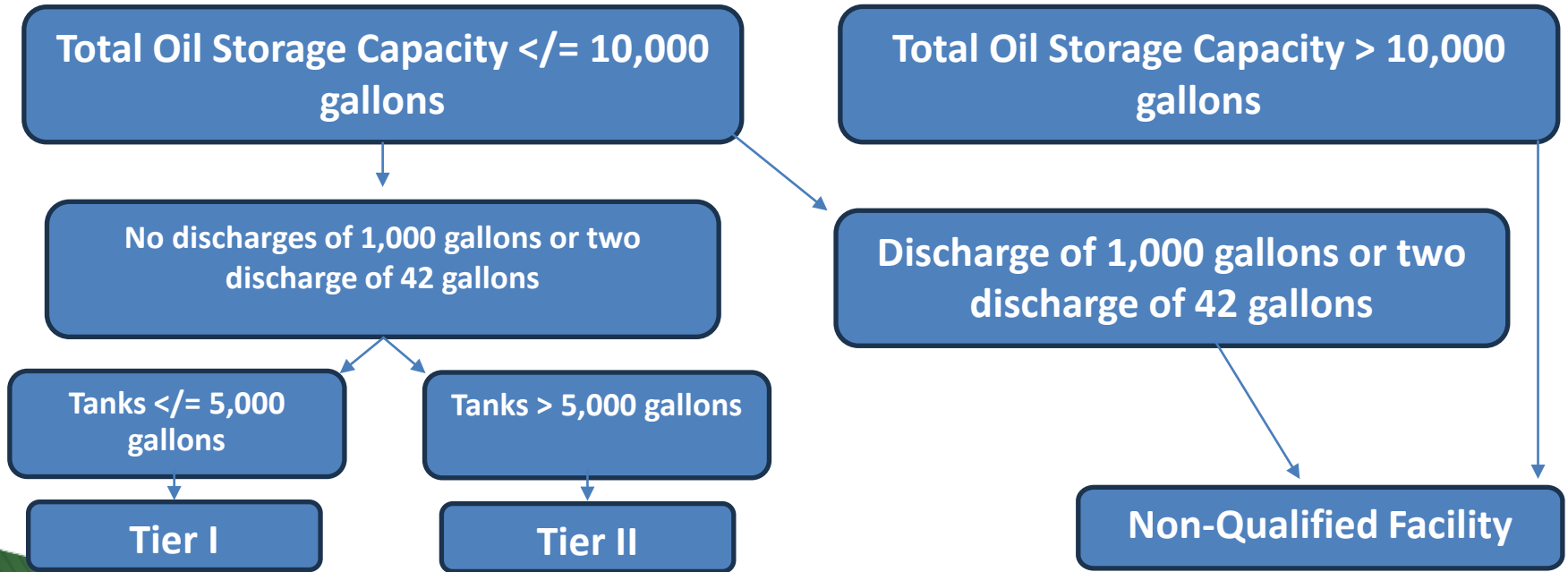
# Poll Question 4:

What is significant about tanks with a capacity of 5,001-gallons or greater?



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# Non-Qualified Facilities



# Non-Qualified Facilities

- ▶ Non-Qualified Facility
  - Requires full PE certified SPCC Plan



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# SPCC Rule Deviations

- ▶ Tier I Qualified Facilities
  - NOT APPLICABLE
- ▶ Tier II Qualified Facilities
  - May deviate from rule requirements (hybrid plan)
    - A self-certified Plan with Professional Engineer (PE)-certified portions



# SPCC Rule Deviations

- ▶ Non-Qualified Facility
  - May deviate from rule requirements
  - May include a Facility Response Plan (FRP)



# SPCC Rule Deviations

- ▶ Environmental Equivalence [§ 112.7\(a\)\(2\)](#)
  - Other means of spill prevention, control, or countermeasure.
  - State the reasons for nonconformance in your Plan
  - Describe alternate methods and how you will achieve equivalent environmental protection.
  - Following good engineering practice and PE certification.



# SPCC Rule Deviations

- ▶ Produced Water [40 CFR 112.9\(c\)\(6\)](#)
  - Alternative to sized secondary containment requirements
  - Description of oil expected
  - Procedures for inspection
  - Perform repairs
  - Promptly address oil discharges
  - Retain records on implementation



# SPCC Rule Deviations

- ▶ Secondary Containment Impracticability [§ 112.7\(d\)](#)
  - Explain secondary containment is not practicable for bulk storage containers
  - Conduct integrity testing and leak testing of the valves and piping
  - Either submit a Facility Response Plan under [§ 112.20](#), or
  - An oil spill contingency plan following the provisions of [part 109](#) and
  - A written commitment of manpower, equipment, and materials required to control and remove any quantity of oil discharged that may be harmful.



# SPCC Overview

- ▶ The SPCC Plan is a facility-specific document to protect the navigable waterways through:
  - Procedures to minimize the potential for oil to **Spill**
  - **Prevention** of oil discharges through containment
  - **Control** measures to keep oil discharges from impacting shorelines and waters of the U.S.
  - **Countermeasures** to contain, clean-up, and mitigate discharges through spill response measures



# SPCC Overview

- ▶ The following information must be included in SPCC Plans:
  - **Oil containers** at the facility including the **contents, capacity, and location** of each container;
  - **Procedures** that you will **use to prevent oil spills**;
  - **Measures** you installed **to prevent oil from reaching water**;
  - **Measures** you will use **to contain and cleanup an oil spill**; and
  - **Emergency contacts and first responders.**



# SPCC Overview

- ▶ The following information must be included in SPCC Plans:
  - Use **containers suitable for the oil stored**;
  - Identify **contractors or other local personnel** who can help you clean up an oil spill;
  - Provide **overflow prevention** for your oil storage containers;
  - Provide **effective, sized secondary containment** for bulk storage containers;
  - Provide effective, **general secondary containment**; and
  - **Periodically inspect and test** pipes and containers when they are installed or repaired.
    - Keep a written record of your inspections.





# Oil Spill/Discharge Requirements

- ▶ “Sheen Rule” Discharges that may be harmful:
  - Violates state water quality standards,
  - Causes a film or sheen on the water’s surface, or
  - Leaves sludge or emulsion beneath the surface.
- Not based on amount of oil discharged
  
- ▶ Contact list and phone numbers [40 CFR 112.7\(a\)\(3\)\(vi\)](#)
  - National Response Center (NRC)
  - Cleanup contractors
  - Federal, State and local agencies



# Oil Spill/Discharge Requirements

- ▶ Oil spill/discharge [40 CFR 112.4](#)
  - Report to the EPA Regional Administrator (RA) when there is a discharge of:
    - More than 1,000 gallons of oil in a single discharge to navigable waters or adjoining shorelines
    - More than 42 gallons of oil in each of two discharges to navigable waters or adjoining shorelines within a 12-month period
    - An owner/operator must report the discharge(s) to the EPA Regional Administrator within 60 days



# Oil Spill/Discharge Requirements

## APSA

### ▶ Petroleum spill/discharge

- ANY significant release/threatened release
  - Local and State Agencies
    - California Governor's Office of Emergency Services (Cal OES)
    - CUPA
    - California Regional Water Quality Control Board (Regional Board)
    - Fire department



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# Oil Spill/Discharge Requirements

- ▶ Documentation
  - Reportable spills must be recorded
  - Retain with SPCC Plan for 3 years



**SPILL REPORTING FORM**  
CLIENT NAME – FACILITY NAME  
Address  
City, State Zip Code

Date and Time of Release: \_\_\_\_\_

Date and Time of Discovery: \_\_\_\_\_

Material released: \_\_\_\_\_

Quantity of material released: \_\_\_\_\_

Quantity of material released to a waterbody: \_\_\_\_\_

Location of release: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Source of release: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

What response was taken to mitigate the spill: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Was spill stopped and contained?     Yes  No

Did the spill reach:	Air	<input type="checkbox"/> Yes* <input type="checkbox"/> No	Storm water System	<input type="checkbox"/> Yes* <input type="checkbox"/> No
	Water	<input type="checkbox"/> Yes* <input type="checkbox"/> No	POTW	<input type="checkbox"/> Yes* <input type="checkbox"/> No
	Soil	<input type="checkbox"/> Yes* <input type="checkbox"/> No	Adjacent Properties	<input type="checkbox"/> Yes* <input type="checkbox"/> No
	Containment	<input type="checkbox"/> Yes* <input type="checkbox"/> No	Waterbody	<input type="checkbox"/> Yes* <input type="checkbox"/> No

What measures have been implemented to prevent future spills/releases: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Has the Emergency Response Agency Notification Form been completed:     Yes  No



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# ASPA Requirements

- ▶ APSA regulates tank facilities that are subject to the federal SPCC rule. [California Health and Safety Code, Division 20, Chapter 6.67](#)
  - Scope and exemptions
  - Requirements for tank facilities
  - Implementation by the unified program agency



# ASPA Requirements

- ▶ APSA Inspections
  - 10,000 gallons or more of petroleum
  - Once every 3 years
- ▶ Review of SPCC Plan
  - *All* tank facilities with aggregate petroleum capacity of 1,320 gallons or more
- ▶ Owner/operator
  - File a tank facility statement with the CUPA
    - Annually, on or before date specified by local CUPA
    - A complete business plan *MAY* satisfy this requirement
  - Pay a fee to the CUPA



**UNIFIED PROGRAM CONSOLIDATED FORM  
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	CA	ZIP CODE
CONTACT NAME	CONTACT PHONE	

**II. TOTAL FACILITY STORAGE CAPACITY**

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 reverse for instructions):

_____	gallons
-------	---------

**III. TANK AND CONTAINER DETAILS**

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

Tank or Container ID Number	Contents (Gas, Diesel, etc.)	Shell Capacity (in gallons)	Location of Tank or Container

**IV. SIGNATURE**

CERTIFICATION: I certify under penalty of law that the information provided herein is accurate and complete to the best of my knowledge.

SIGNATURE OF TANK FACILITY OWNER OR OPERATOR	PRINT NAME OF TANK FACILITY OWNER OR OPERATOR	DATE (MM/DD/YYYY)



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# SPCC Plan Implementation

- ▶ Contents of the SPCC Plan
- ▶ Supplemental Documentation
  - Training
  - Inspections
  - Spill History
  - 5-year evaluation and review
  - Amendments



# SPCC Plan Implementation

- ▶ Training
  - For personnel working around or with oil
  - Initial and annual refresher, including spill briefings
- ▶ Documentation
  - Roster with training topics
  - Filed with SPCC Plan for 3 years



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**SPILL PREVENTION, CONTROL, AND COUNTERMEASURES  
COMPLIANCE TRAINING**

Client Name – Facility Name

Address

City, State Zip Code

**Training to Include:**

- The contents of the facility SPCC Plan and the applicable pollution control laws, rules, and regulations.
- Filling and dispensing procedures
- Tanker truck loading, transport, and dispensing operations
- Spill response and notification procedures (land and water spills)
- Discussion of past spill/leaks
- Compressor operation/hydraulic tank operation
- Inspection requirements and proper completion of forms

Name of Trainer: \_\_\_\_\_

Date: \_\_\_\_\_

Name of Employee

Signature

Job Title

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



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# SPCC Plan Implementation

## ▶ Integrity Inspections

- Bulk Storage Containers
  - Type and frequency based on container design
  - Qualified personnel

## ▶ Documentation

- Retain records for 3 years
- Formal tank inspections and testing retain for life of the tank



## 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
<b>Tank and Piping</b>			
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	



## STI SP001 Portable Container Monthly Inspection Checklist

**General Inspection Information:**

Inspection Date: _____	Prior Inspection Date: _____	Retain until date: _____
Inspector Name (print): _____	Title: _____	
Inspector's Signature: _____		
Container(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).
- This periodic Inspection is intended for monitoring the external condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for at least 36 months.

Item	Area:	Area:	Area:	Area:
Portable Container Containment/Storage Area				
1 Are all portable container(s) within designated storage area?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
2 Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
3 Are drain valves closed and in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4 Are containment egress pathways clear and any gates/doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Container				
5 Is the container free of leaks? <i>Note: If "No", identify container and describe leak.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
6 Is the container free of distortions, buckling, denting or bulging?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No



## STI SP001 Annual 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).
- 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.
- Remove promptly standing water or liquid discovered in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility should regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- 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.
- Complete this checklist on an annual basis, supplemental to the owner monthly-performed inspection checklists.
- **Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.**

	ITEM	STATUS	COMMENTS / DATE CORRECTED
<b>Tank Foundation/Supports</b>			
1	Free of tank settlement or foundation washout?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2	Concrete pad or ring wall free of cracking and spalling?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	



# Poll Question 5:

How often must an owner/operator perform portable container inspections according to STI SP001?





# Portable Containers



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# Portable Containers



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# SPCC Plan Implementation

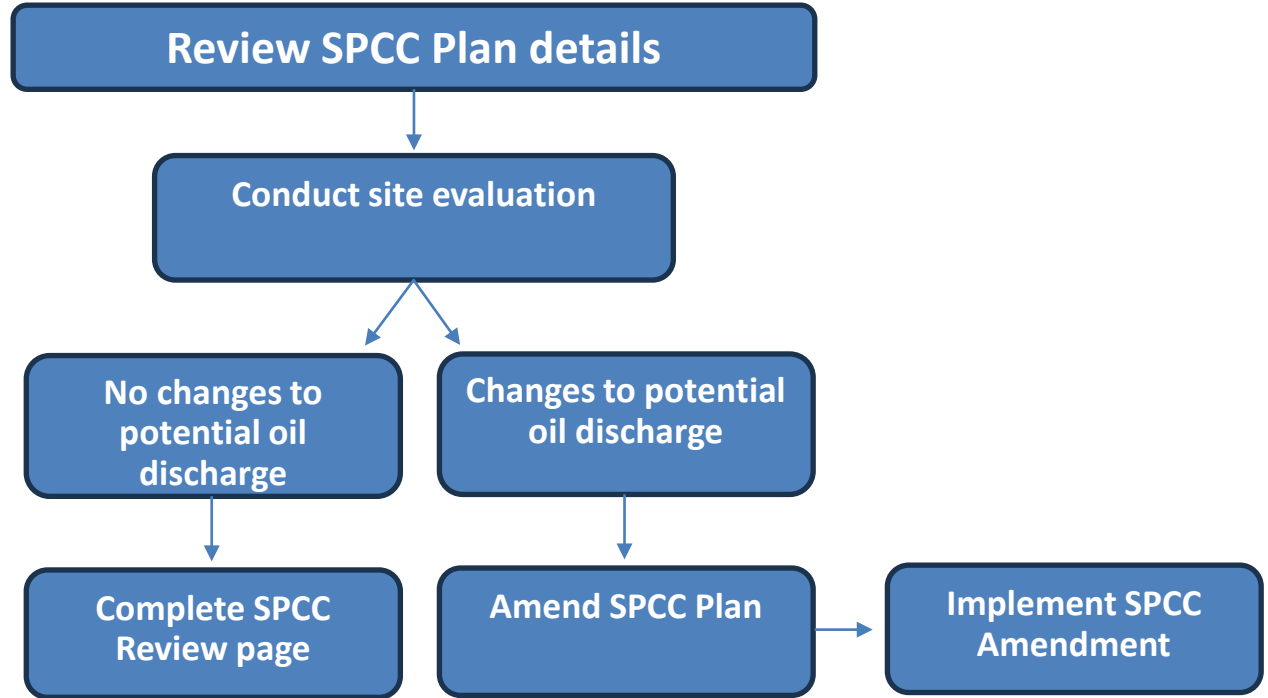
- ▶ SPCC Plan 5-Year Review
  - Required within 5 years of last site evaluation and plan review
  - Consists of review of Plan and Facility to indicate if an amendment is required
- ▶ Documentation
  - Review page and indicate if an amendment is needed

*“The only thing that is constant is change”  
- Greek Philosopher*



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# 5-Year Review



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# Site Evaluation Findings

## ▶ Technical or Non-Technical Amendment?

- Technical Amendment (§ 112.5)
  - Change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge (112.1(b)).
- Non-technical amendments
  - Administrative changes not materially affecting the facility's potential to discharge oil
  - Changes to ownership, emergency contacts, phone numbers, or names
  - Product changes compatible with existing tank/secondary containment conditions
  - Replacing identical quality/capacity/number containers or equipment



# Site Evaluation Findings

- ▶ **No changes in past 5 years?**
  - **Commonly found during site evaluations:**
    - Emergency contact changed (i.e., Facility Response Coordinator)
    - Emergency clean-up contractor changed (i.e., Safety Kleen to Ramos Environmental)



**SPILL PREVENTION, CONTROL, AND  
COUNTERMEASURE PLAN**

**Client Name**  
**Facility Name**  
**Address**  
**City, State Zip Code**

**SPCC Plan Preparation Prior to Facility Becoming Operational?**

[40 CFR 112.3(b)(1)]

Yes  
 No

Original Date of Plan: ..... Month Day, Year  
Date of Previous Plan Review/Amendment /P.E. Certification: .. Month Day, Year  
Date of Site Evaluation and Plan Review: ..... Month Day, Year  
Date of Plan Amendment: ..... Month Day, Year  
Next review date on or before: ..... Month Day, Year

**Designated Person Accountable for Spill Prevention:**

Name, Title  
Address  
State, City Zip  
Telephone Number

**CERTIFICATION**  
[40 CFR 112.3(d)]

I have visited the Facility and, being familiar with the provisions of 40 CFR Part 112, I attest that this Spill Prevention, Control, and Countermeasure Plan (SPCC) Plan has been prepared in accordance with good engineering practices and consideration of applicable industry standards, that procedures for required spill response are in place, and this Plan is adequate for the Facility.



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SPCC Plan is not complete without  
found in the SPCC

**SPILL PREVENTION, CONTROL, AND COUNTERMEASURE  
COMPLIANCE INSPECTION PLAN  
REVIEW PAGE**

**Client Name  
Facility Name**

In accordance with 40 CFR 112.5(b), a review and evaluation of this Spill Prevention, Control, and Countermeasure (SPCC) Plan is conducted at least once every 5 years<sup>1</sup>. As a result of this review and evaluation, Client Name will amend the SPCC Plan within 6 months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event from the Facility, and (2) such technology has been field-proven at the time of review. Amendment to the SPCC Plan shall be certified by a Professional Engineer within 6 months after a change in the Facility design, construction, operation, or maintenance occurs which materially affects the Facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.

	<u>Review Dates</u>	<u>Comment</u>	<u>Signature</u>	<u>Amend Plan</u>	<u>Site Evaluation</u>
1.	Month Day, Year	New Plan		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2.	Month Day, Year	Non-Technical Amendment: Contacts		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3.	Month Day, Year	5-Year Review & Site Evaluation		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4.	Month Day, Year	Technical Amendment: Added T7 and T8		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5.				<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.				<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

DATE ON OR BEFORE MONTH, DAY, YEAR

PROVAL



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# Site Evaluation Findings

- ▶ **No changes in past 5 years? Impressive!**
  - **Commonly found during site evaluations:**
    - Change in oil storage location(s) (i.e., Maintenance Shop to Hazardous Materials Shed)



# Site Evaluation Findings: Oil Storage Location Changes



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# Site Evaluation Findings

- ▶ **No changes in past 5 years? We shall see!**
  - **Commonly found during site evaluations:**
    - New oil added to Facility of 55-gallons or greater (i.e., kerosene)
    - Previously existing oil of 55-gallons or greater removed (i.e., cobalt)



# Site Evaluation Findings: New Oil Added / Existing Oil Removed



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# Site Evaluation Findings

- ▶ **No changes in past 5 years? Think again!**
  - **Commonly found during site evaluations:**
    - Tank replacement(s)



# Site Evaluation Findings: Tanks Replaced



# Site Evaluation Findings

- ▶ **No changes in past 5 years?**
  - **Commonly found during site evaluations:**
    - New or used empty tanks
    - Permanently closed tanks



# Site Evaluation Findings: Used Empty Tanks





# Site Evaluation Findings: Used Empty Tanks



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# Site Evaluation Findings

- ▶ **Tank construction for material stored**
  - **Commonly found during site evaluations:**
    - Insufficient tank normal or emergency venting



# Site Evaluation Findings: Insufficient Ventilation



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# Site Evaluation Findings

## ▶ Documentation filing

### ○ Commonly found during site evaluations:

- Non-reportable spills not recorded or “never happen”
- Secondary drainage forms not completed
- Training not completed annually
- Other regulatory program training used in place of SPCC training requirements
- Pencil whipped inspection forms
- Unresolved deficiencies recorded in inspection forms month after month



# Site Evaluation Findings: Tank Fill Box Condition



# Site Evaluation Findings

## ▶ Good engineering practices

### ○ Commonly found during site evaluations:

- Tanks without emergency response signage (i.e., NFPA diamonds)
- Oil storage areas without emergency response procedures and contact information
- Fuel dispenser hosing resting on ground surface



# Site Evaluation Findings: Fuel Dispenser Hosing Practices



# Poll Question 6:

How often must an owner or operator perform a site evaluation and review their Facility's SPCC Plan?



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# SPCC Plan Implementation

- ▶ SPCC Plan Amendments

- Required within 6 months of a change:

- **Administrative** – personnel name change, response company changed
    - **Technical** – improved spill and discharge prevention measures, change in discharge potential, changed tanks, removed tanks, added tanks, equipment install, etc.



# SPCC Plan Implementation

## ▶ Documentation

- Tier I and Tier II Qualified Facilities
  - Certification completed by authorized person
- Non-Qualified Facility
  - Certified Engineer amendment signed and stamped

## ▶ Implementation of changes required within 6 months of Plan amendment



### TECHNICAL AMENDMENT CERTIFICATION

Refer to revision ## of the Compliance Inspection Plan Review  
[40 CFR 112.3(d)]

My representative has visited the Facility and, being familiar with the provisions of 40 CFR Part 112, I attest that this *Technical Amendment* to the Spill Prevention, Control, and Countermeasure Plan (SPCC) Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, that procedures for required inspections and testing have been established, and this Plan is adequate for the Facility.

Client is solely responsible for implementation of this SPCC Plan Amended date.

Engineer: \_\_\_\_\_

Signature: \_\_\_\_\_

Registration Number: \_\_\_\_\_

State: \_\_\_\_\_

SEAL

Date: \_\_\_\_\_



# Poll Question 7:

When must an owner or operator of an applicable Facility amend their SPCC Plan?



# Summary

## SPCC Rule Requirements

- ▶ **Prepare** an SPCC Plan with Code of Federal Regulations (CFR)
- ▶ **Implement** SPCC Plan
- ▶ **Update** SPCC Plan



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# Summary

## ASPA Requirements

- ▶ **Prepare** an SPCC Plan
- ▶ **File a tank facility statement**/annual certification of the business plan
- ▶ **Submit** required **annual fee**
- ▶ Implement SPCC Plan
- ▶ Update SPCC Plan
- ▶ **Comply with other ASPA requirements**



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# Audience Questions?



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# What To Expect When *Implementing* SPCC Plans

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