# SPCC PLAN WRITING TIPS & TRICKS

February 27, 2024; Tu-H4

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**26th Annual California CUPA Training Conference**
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## What's this class? SPCC Plan Writing Tips

**Class Objectives:**

- Provide facility owners & operators (& my competitors) some tips on writing decent SPCC Plans that:
  - Meets applicable rule requirements
  - Can be implemented
  - Is somewhat flexible
  - Could pass a CUPA inspection, and
  - Meets the intended oil spill prevention goal.

# Are you???

A. Regulated facility(ies)?
B. Consultant?
C. UPA APSA regulator or inspector?
D. State/Fed (OSFM, CalEPA, US EPA)?
E. Just sitting though this to get Uncle Steve's Irish Whisky recommendations


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# Class (my) Assumptions

- **You guys have already determined (or were told) that an SPCC Plan is required**…and
- You're either going to write the thing yourself
  - or want to review an existing Plan
- Or are going to hire a consultant to write it or otherwise help you comply
- Or are  a consultant and want to write better plans
  - Promising not to steal my clients or potential clients ☺
- Or are an inspector and want better insight into (APSA) Plan contents




# Assumption

- **Don't mean to nag… but you really should already be familiar with SPCC/APSA applicability thresholds, triggers and Plan types**
  - **And basic rule requirements**

- **On a 1 to 10 scale –what's your experience with/ knowledge of SPCC rule and Plan requirements?**

1


10

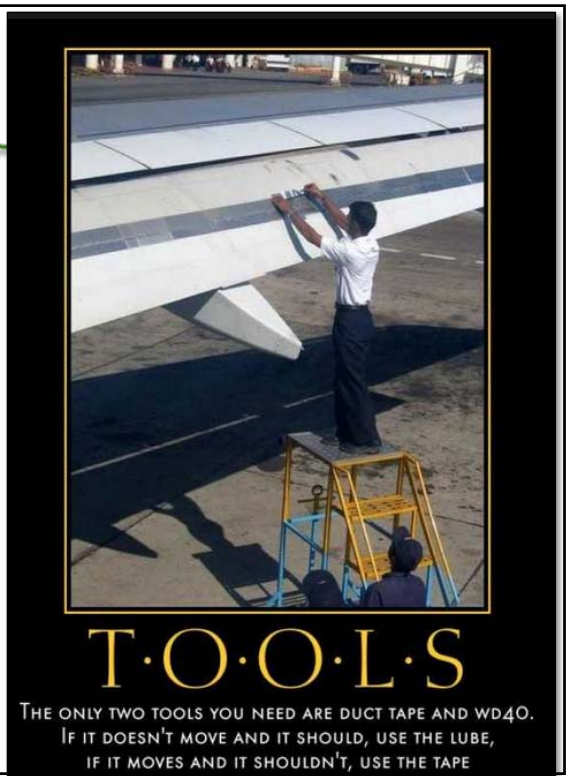



# Have you…?

- Written one or more of the following SPCC Plans:
  A. USEPA Tier 1 template plan
  B. OSFM Tier 2 template plan
  C. Full non-qualified (PE certified) plan
  D. Only the imaginary ones the voices in my head tell me to write

# Helpful Tools

- These can be a HUGE help in writing compliant Plans and ensuring compliance
- CUPA APSA inspection checklists
  - Can be helpful to verify whether the Plan is complete
- On USEPA web page:
  - SPCC Field Inspection Checklist for Onshore Facilities
    - Much more useful in verifying Plan completeness as well as quality (to an extent)




# USEPA SPCC Field Inspection Checklist for Onshore Facilities

| | | PLAN | FIELD |
|---|---|---|---|
| 112.7(c) | Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in §112.1(b), **except as provided in §112.7(k) of this section for certain qualified operational equipment**. The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method, design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. See Attachment A of this checklist.<br>**For onshore facilities**, one of the following or its equivalent:<br>• Dikes, berms, or retaining walls sufficiently impervious to contain oil;<br>• Curbing or drip pans;<br>• Sumps and collection systems;<br>• Culverting, gutters or other drainage systems;<br>• Weirs, booms or other barriers;<br>• Spill diversion pond;<br>• Retention ponds; or<br>• Sorbent materials. | | |
| | Identify which of the following are present at the facility and if appropriate containment and/or diversionary structures or equipment are provided as described above: | | |
| | ☐ Bulk storage containers | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐Mobile/portable containers | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐Oil-filled operational equipment (as defined in 112.2) | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐Other oil-filled equipment (i.e., manufacturing equipment) | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐Piping and related appurtenances | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐Mobile refuelers or non-transportation-related tank cars | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐Transfer areas, equipment and activities | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐Identify any other equipment or activities that are not listed above: | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| 112.7(d) | Secondary containment for one (or more) of the following provisions is determined to be impracticable:<br>☐General secondary containment ☐Bulk storage containers §§112.8(c)(2)/112.12(c)(2) | ☐Yes ☐No | |

| | | PLAN | FIELD |
|---|---|---|---|
| (7) | Leakage through defective internal heating coils controlled:<br>• Steam returns and exhaust lines from internal heating coils that discharge into an open watercourse are monitored for contamination, **OR**<br>• Steam returns and exhaust lines pass through a settling tank, skimmer, or other separation or retention system | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA |
| (8) | Each container is equipped with at least one of the following for liquid level sensing:<br>• High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station, or audible air vent in smaller facilities;<br>• High liquid level pump cutoff devices set to stop flow at a predetermined container content level;<br>• Direct audible or code signal communication between container gauger and pumping station;<br>• Fast response system for determining liquid level (such as digital computers, telepulse, or direct vision gauges) and a person present to monitor gauges and overall filling of bulk containers; or<br>• Regularly test liquid level sensing devices to ensure proper operation. | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (9) | Effluent treatment facilities observed frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b) | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (10) | Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (11) | Mobile or portable containers positioned to prevent a discharge as described in §112.1(b).<br>Mobile or portable containers (excluding mobile refuelers and other non-transportation-related tank trucks) have secondary containment with sufficient capacity to contain the largest single compartment or container and sufficient freeboard to contain precipitation | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA |
| **112.8(d)/112.12(d)Facility transfer operations, pumping, and facility process** | | | |
| (1) | Buried piping installed or replaced on or after August 16, 2002 has protective wrapping or coating<br>Buried piping installed or replaced on or after August 16, 2002 is also cathodically protected or otherwise satisfies corrosion protection standards for piping in 40 CFR part 280 or 281<br>Buried piping exposed for any reason is inspected for deterioration; corrosion damage is examined; and corrective action is taken | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA |

# A Good Written SPCC Plan (and APSA/SPCC Compliance) Means…

1. Complying with the detailed rule requirements
   - Read the SPCC rule and APSA statute (and regs when final)
     - Read the various guidance, FAQs, listen to CUPA classes if needed
   - Make sure you understand the requirements
2. ***Writing the descriptive facility-specific SPCC Plan per the rule***
   - Write/read the Plan carefully (against a checklist helps)
   - Be sure the Plan:
     a) Is complete
     b) Addresses all relevant rule requirements
     c) Is sufficiently detailed (to allow understanding and verification) and
     d) Accurately matches the facility (tanks, containers, equipment, areas, operations, oils, etc.)

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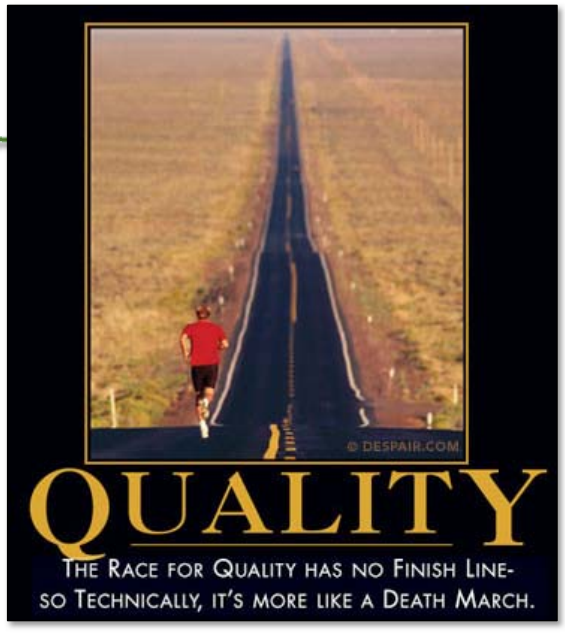
## A Good Written SPCC Plan (and APSA/SPCC Compliance) Means…

3. ***Assuring that the Plan is consistent with field conditions***
   - Field verify that the Plan and the facility (areas, tanks, containers, locations, capacities, descriptions, measurements, etc. etc.) are consistent and current
4. Implementing the Plan as written
   - Periodically:
     a) Field verify compliance with rule requirements and the Plan
     b) Review training and inspections
     c) Keep the Plan up to date



## …Then Repeat

- Rinse & repeat: keep doing 34343434343434343434 (& sometimes 1 & 2 again)
- THAT'S how you make sure you get a good SPCC Plan (and assure ongoing compliance)



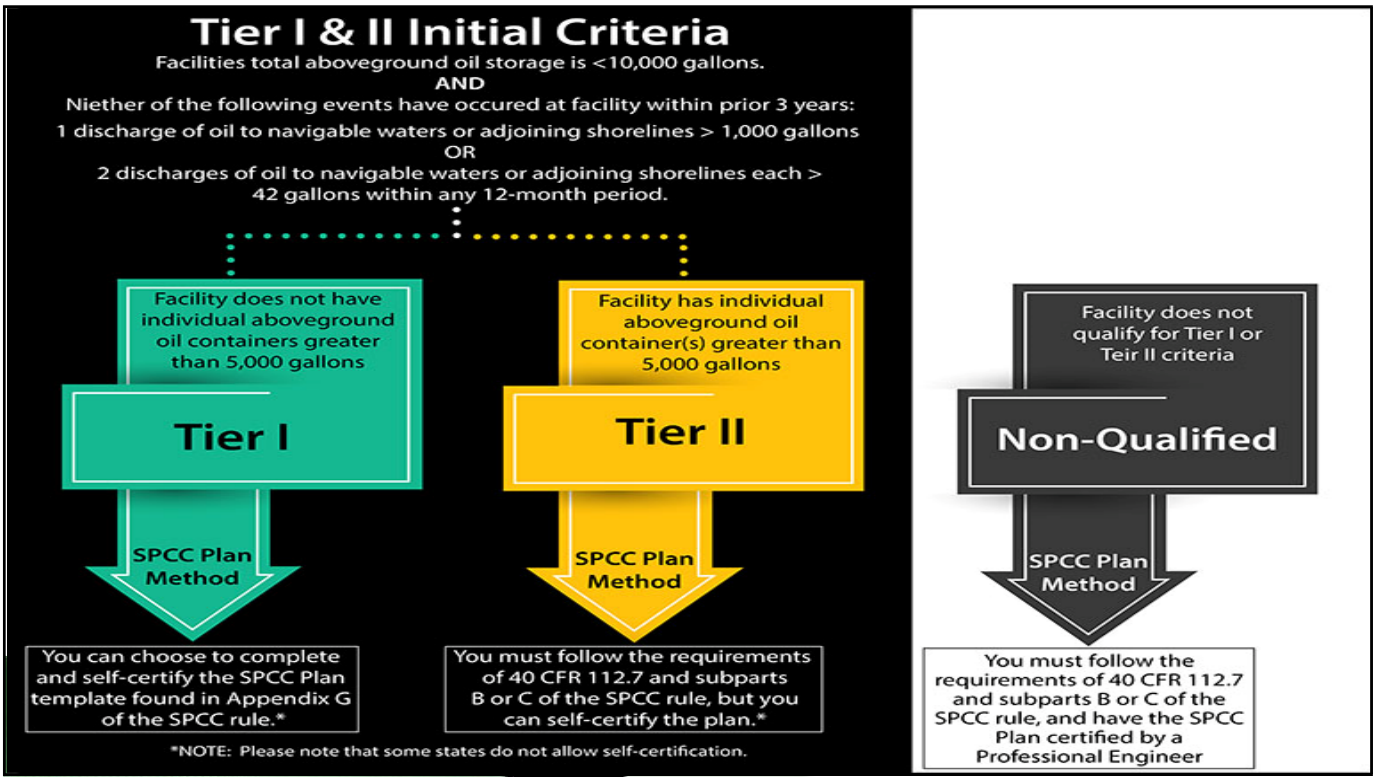
# WORTH REPEATING…

- **The more familiar you are with the SPCC rule & APSA statute (and relevant guidance)…**
  - **The better the Plan you write will be**
  - **And the more likely your compliance with the Plan and rule, etc. will be**


# Three 'Types' of APSA Facilities:

## Tier I & Tier II Qualified Facilities… and Non-Qualified

- Type of Plan and some compliance requirements vary
  1. **Tier I Qualified Facilities**
     - Can use the US EPA SPCC Plan template to prepare their site-specific SPCC Plan, with self-certification by facility
       - Enhanced compliance flexibility… but engineering restrictions
  2. **Tier II Qualified Facilities**
     - Prepare 'regular' site-specific SPCC Plan **or** can use the OSFM Tier II Template, both with self-certification by facility
       - Some compliance flexibility… but engineering restrictions
  3. **Non-Qualified Facilities**
     - Prepare 'regular' site-specific SPCC Plan, with Registered Professional Engineer review & certification




# 40 CFR 112 Structure and Provisions Applicable to APSA Tank Facilities

| Regulation | Topics |
|---|---|
| Subpart A<br>40 CFR 112.1 - 112.7 | Applicability, definitions, and general requirements for all facilities, and SPCC Plan elements |
| Subpart B<br>40 CFR 112.8<br>40 CFR 112.9- .11 | Requirements at on-shore non-oil productionbulk storage facilities, on-and off-shore oil production, drilling, etc. facilities and non-petroleum oils, except those covered in Subpart C |
| Subpart C<br>40 CFR 112.12 | Requirements for animal fats and oils and greases, and fish and marine mammal oils; and vegetable oils, including oils from seeds, nuts, fruits, and kernels |
| Subpart D<br>40 CFR 112.20 | Response requirements (FRP rule) |

**Sections relevant to APSA: 40 CFR 112.1 through 112.8, and 112.20(e)**

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# 40 CFR 112 Structure (as applicable to APSA)

§112.1 General applicability of the rule
§112.2 Definitions of terms used in the rule
§112.3 Requirement to prepare an SPCC Plan
§112.4 Amendment of SPCC Plan by EPA Regional Administrator
§112.5 Amendment of SPCC Plan by owner or operator
§112.6 Qualified Facilities [Tier 1 and Tier 2] – (2006 amendment)
§112.7 General requirements of all facilities
§112.8 - .12 Additional specific requirements for 'bulk containers' and certain bulk container facilities

*(container = tank)*

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## Summary of SPCC Rule Requirements & SPCC Plan Elements (40 CFR 112)

**Section 112.1 – General applicability of the SPCC rule**
- Describes equipment, oils, and facilities subject to as well as exempt from the SPCC rule
- Describes/references the criteria for harmful discharges to navigable water **[112.1(b)]**
- Describes the purpose of SPCC Plans **[112.1(e)]**

**Section 112.2 – Definitions**
- Definition of terms used in the SPCC rule (some terms defined or clarified in other SPCC rule sections; e.g. qualified facilities, non-transportation-related tank truck, etc.)

**Section 112.3 – Requirement to prepare an SPCC Plan**
- Compliance dates/deadlines for various facility types **[112.3(a)-(b)]**
- PE review and certification requirements **[112.3(d)]**
- Required SPCC Plan locations **[112.3(e)]**
- Time extensions granted by US EPA RA **[112.3(f)]**
- Qualified facilities **[112.3(g)]**

**Section 112.4 – Amendment of SPCC Plan by US EPA Regional Administrator**
- Information and SPCC Plan submittal requirements to US EPA RA and state/local agencies after certain discharges **[112.4(a)-(c)]**
- Requirement to amend the SPCC Plan if required by US EPA RA **[112.4(d)-(f)]**

**Section 112.5 – Amendment of SPCC Plan by facility owner/operator**
- Required SPCC Plan amendment and implementation after changes **[112.5(a)]**
- 5-year review and evaluation by owner/operator and implement amendments **[112.5(b)]**
- Required PE certification of any technical amendments **[112.5(c)]**

**Section 112.6 – Qualified facilities**
- Specific requirements unique to Tier I qualified facilities and reference to 112.7 and 112.8 requirements applicable to Tier I qualified facilities **[112.5(a)]**
- Specific requirements unique to Tier II qualified facilities and reference to 112.7 and 112.8 requirements applicable to Tier II qualified facilities **[112.6(b)]**

**Section 112.7 - General requirements (for SPCC Plans) for all facilities**
- Management commitment, SPCC Plan format, and deferred equipment or procedure requirements **[112.7]**
- Discussion of facility conformance to the SPCC rule **[112.7(a)(1)]**
- Environmental equivalence – Conditionally allow deviations from specific sections and requirements with equivalent/alternative means **[112.7(a)(2)]**
- Facility description and diagram **[112.7(a)(3)]**
- Type of oil and storage capacity of each container **[112.7(a)(3)(i)]**
- Discharge prevention measures including procedures for routine handling of oil **[112.7(a)(3)(ii)]**
- Discharge/drainage controls including secondary containment and discharge control procedures **[112.7(a)(3)(iii)]**
- Countermeasures for discharge discover, response, and cleanup **[112.7(a)(3)(vi)]**
- Disposal methods for recovered materials **[112.7(a)(3)(v)]**
- Emergency response/notification contact list and phone numbers **[112.7(a)(3)(vi)]**
- Information and procedures for discharge reporting **[112.7(a)(4)]**
- Organization of discharge procedures in SPCC Plan so readily useable in an emergency **[112.7(a)(5)]**
- Spill predictions and associated equipment failure descriptions (discharge direction, rate of flow, quantity of oil, etc.) **[112.7(b)]**

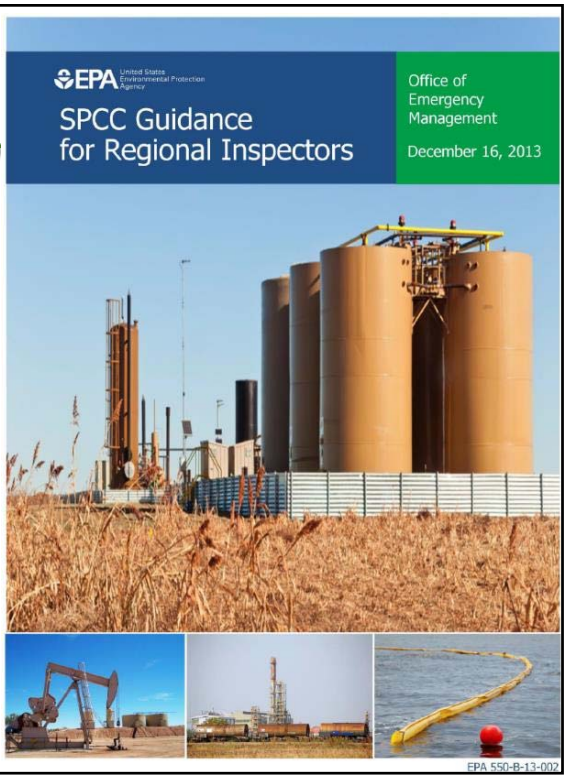


- Requirements and standards for containment and/or diversionary structures; general containment for most likely release/discharge; examples of containment/diversionary structures **[112.7(c)]**
- Impracticability determination – Explanation and alternate requirements for secondary containment **[112.7(d)]**
- Inspections/tests procedures and records requirements **[112.7(e)]**
- Personnel training and discharge prevention briefings **[112.7(f)]**
- Facility security **[112.7(g)]**
- Facility tank car and tank truck loading/unloading rack requirements **[112.7(h)]**
- Brittle fracture evaluation after repair, alteration, reconstruction, or change in service for field-erected tanks **[112.7(i)]**
- Discussion requirements for conformance to applicable requirements and other more stringent federal, state, or local requirements **[112.7(j)]**
- Conditional alternative requirements for general secondary containment for qualified oil-filled operational equipment **[112.7(k)]**

**Section 112.8 – SPCC Plan requirements for onshore facilities**
- Requirement to meet the 112.7 general requirements and the 112.8 specific discharge prevention and containment requirements **[112.8(a)]**
- Facility drainage restrictions, required procedures, and methods **[112.8(b)(1) – (5)]**
- Bulk storage container compatibility with stored materials and conditions **[112.8(c)(1)]**
- Requirements and standards for sized secondary containment for bulk storage containers and tanks (100% capacity plus precipitation freeboard) **[112.8(c)(2)]**
- Requirements for and limitations on drainage of uncontaminated rainwater from diked areas **[112.8(c)(3)]**
- Corrosion protection requirements for buried or partially buried/bunkered metallic storage tanks **[112.8(c)(4)&(5)]**
- Specific requirements and examples of regular or periodic integrity testing or inspection of each tank or container; determination of methods and qualifications in accordance with industry standards; test/inspection recordkeeping, including comparison records **[112.8(c)(6)]**
- Controlling leaks from/through internal heating coils **[112.8(c)(7)]**
- Engineer/update container installation in accordance with good engineering practice; specific allowable and required methods for overfill prevention and testing of liquid level sensing devices **112.8(c)(8)]**
- Effluent treatment facility observation requirement **[112.8(c)(9)]**
- Prompt correction of visible discharges from containers and components; removal of accumulations of oil in diked areas **[112.8(c)(10)]**
- Required position/locating of portable and mobile containers and tanks to prevent a discharge to navigable waters; required sized secondary containment (except for mobile refuelers and non-transportation tank trucks) **[112.8(c)(11)]**
- Protective wrapping/coating requirements for buried pipping and inspections if uncovered or exposed **[112.8(d)(1)]**
- Out of service or standby terminal connection requirements **[112.8(d)(2)]**
- Design requirement for pipe supports – minimize abrasion/corrosion, allow for expansion/contraction **[112.8(d)(3)]**
- Regular inspection of aboveground valves, piping, and appurtenances and integrity and leak testing of buried piping when installed, modified, relocated, replaced, etc. **[112.8(d)(4)]**
- Warning vehicles to prevent endangerment of piping and oil transfers **[112.8(d)(5)]**

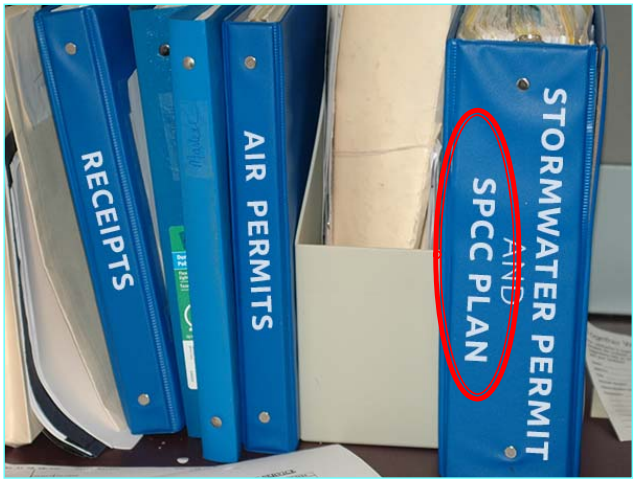

## Guidance – Very helpful for deeper rule understanding

- **USEPA SPCC Guidance for Regional Inspectors**
  - Examples/scenarios, references, tables, explanations, etc.
  - Much more comprehensive appendices and references
  - A must read!
- …and OSFM APSA FAQ and other info
  - Various other CUPA classes



# SPCC Rule vs SPCC Plan


What you have to do & what standards your stuff has to meet




How you plan on doing what you have to do & how your stuff meets the standards

# Plan Writing

- The planning is a critical part of SPCC Plan compliance
  - **Whether the Plan is self-written or turfed out to a consultant**
    - **Facility personnel MUST be closely involved in the Plan development**
      - **Management, environmental, facilities & maintenance, operations**
    - **Consultants (& facility Plan writers) need to ask & understand the right questions and be thoroughly field-familiar with the facility**
  - **For all the following rule requirements, the Plan should *clearly (and accurately)* describe how the facility is meeting each requirement**
  - **Even the QF template Plans need to represent thought and knowledge of facility tanks/containers, operations and maintenance programs**

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# SPCC Rule vs SPCC Plan

- Federal SPCC rule is applicable to California facilities
  - The rule (40 CFR 112.1 – 112.8) contains "performance-oriented" and some prescriptive requirements & specifications for:

1. ***Engineering*-based spill prevention**
   - **Containment, discharge controls/valves, overfill prevention, etc.**
2. ***Procedure*-based spill prevention/response**
   - **Inspections, overfill prevention, containment drainage, leak correction, spill response, etc.**
3. ***Administrative*-based spill prevention**
   - **Training, management review & certification, recordkeeping, etc.**



# If you are unsure of the details

- Ask questions, e.g.…
  - What does this mean?
  - What are the compliance options?
  - How does this (tank, area, activity, etc.) meet the requirement?
    - Or why does it not?
  - How much detail is needed?

# SPCC Rule vs SPCC Plan

## 1. Engineering-based spill prevention
**(112.6, .7 & .8)**

- *Performance-oriented* design requirements or options for most of the following

➢ **Secondary containment & containment impermeability**
  - ➢ Bulk storage containment: specification standard
  - ➢ General containment: performance-oriented standard

➢ **Discharge controls (drainage valves)**

➢ **Compatibility with materials stored and conditions**

➢ **Engineer or update each container installation in accordance with good engineering practice**

➢ **Security of oil handling equipment & areas**

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# SPCC Rule vs SPCC Plan

➢ …requirements & specifications for:

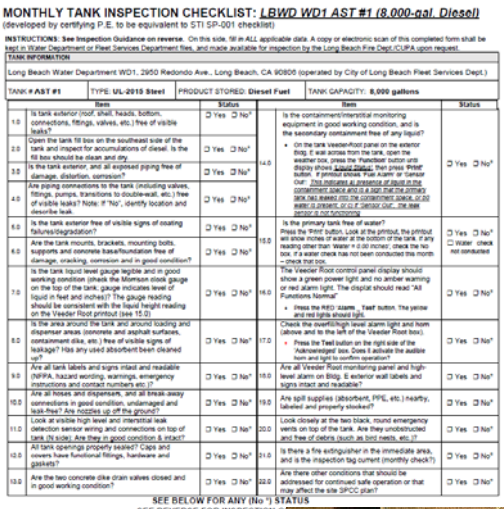
## 2. Procedural-based spill prevention (112.6, .7 & .8)

- Most are also *performance-oriented*

➢ **Inspections of tanks, containers, piping, valves, and other oil handling areas (and written inspection frequency and procedures)**

➢ **Integrity testing of tanks and containers (and written testing frequency and procedures)**

➢ **Overfill prevention (written) procedures**



MONTHLY TANK INSPECTION CHECKLIST: *LBWD WD1 AST #1 (8,000-gal. Diesel)*
(developed by certifying P.E. to be equivalent to STI SP-001 checklist)

INSTRUCTIONS: **See Inspection Guidance on reverse.** On this side, fill in ALL applicable data. A copy or electronic scan of this completed form shall be kept in Water Department or Fleet Services Department files, and made available for inspection by the Long Beach Fire Dept./CUPA upon request.

TANK INFORMATION

Long Beach Water Department WD1, 2950 Redondo Ave., Long Beach, CA 90806 (operated by City of Long Beach Fleet Services Dept.)

TANK # **AST #1** | TYPE: **UL-2015 Steel** | PRODUCT STORED: **Diesel Fuel** | TANK CAPACITY: **8,000 gallons**

| | Item | Status |
|---|---|---|
| 1.0 | Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? | ☐ Yes ☐ No* |
| 2.0 | Open the tank fill box on the southeast side of the tank and inspect for accumulations of diesel. Is the fill box should be clean and dry. | ☐ Yes ☐ No* |
| 3.0 | Is the tank exterior, and all exposed piping free of damage, distortion, corrosion? | ☐ Yes ☐ No* |
| 4.0 | Are piping connections to the tank (including valves, fittings, pumps, transitions to double-wall, etc.) free of visible leaks? Note: If "No", identify location and describe leak. | ☐ Yes ☐ No* |
| 5.0 | Is the tank exterior free of visible signs of coating failures/degradation? | ☐ Yes ☐ No* |
| 6.0 | Are the tank mounts, brackets, mounting bolts, supports and concrete base/foundation free of damage, cracking, corrosion and in good condition? | ☐ Yes ☐ No* |
| 7.0 | Is the tank liquid level gauge legible and in good working condition (check the Morrison clock gauge on the top of the tank; gauge indicates level of liquid in feet and inches)? The gauge reading should be consistent with the liquid height reading on the Veeder Root printout (see 15.0) | ☐ Yes ☐ No* |
| 8.0 | Is the area around the tank and around loading and dispenser areas (concrete and asphalt surfaces, containment dike, etc.) free of visible signs of leakage? Has any used absorbent been cleaned up? | ☐ Yes ☐ No* |
| 9.0 | Are all tank labels and signs intact and readable (NFPA, hazard wording, warnings, emergency instructions and contact numbers etc.)? | ☐ Yes ☐ No* |
| 10.0 | Are all hoses and dispensers, and all break-away connections in good condition, undamaged and leak-free? Are nozzles up off the ground? | ☐ Yes ☐ No* |
| 11.0 | Look at visible high level and interstitial leak detection sensor wiring and connections on top of tank (N side). Are they in good condition & intact? | ☐ Yes ☐ No* |
| 12.0 | All tank openings properly sealed? Caps and covers have functional fittings, hardware and gaskets? | ☐ Yes ☐ No* |
| 13.0 | Are the two concrete dike drain valves closed and in good working condition? | ☐ Yes ☐ No* |

| | Item | Status |
|---|---|---|
| 14.0 | Is the containment/interstitial monitoring equipment in good working condition, and is the secondary containment free of any liquid?<br>• On the tank Veeder-Root panel on the exterior (brig. E wall across from the tank, open the weather box, press the "Function" button until display shows "Liquid Status", then press "Print" button. If printout shows "Fuel Alarm" or "Sensor Out", *This indicates a presence of liquid in the containment space and is a sign that the primary tank has leaked into the containment space, or (2) water is present, or (c) if "Sensor Out", the leak sensor is not functioning.* | ☐ Yes ☐ No* |
| 15.0 | Is the primary tank free of water?<br>Press the "Print" button. Look at the printout, the printout will show inches of water at the bottom of the tank. If any reading other than "Water = 0.00 inches", check the No box. If a water check has not been conducted this month – check that box. | ☐ Yes ☐ No*<br>☐ Water check not conducted |
| 16.0 | The Veeder Root control panel display should show a green power light and no amber warning or red alarm light. The display should read "All Functions Normal"<br>• Press the RED "Alarm, Test" button. The yellow and red lights should light. | ☐ Yes ☐ No* |
| 17.0 | Check the overfill/high level alarm light and horn (above and to the left of the Veeder Root box).<br>• Press the **Test** button on the right side of the "Acknowledged" box. Does it activate the audible horn and light to confirm operation? | ☐ Yes ☐ No* |
| 18.0 | Are all Veeder Root monitoring panel and high-level alarm on Bldg. E exterior wall labels and signs intact and readable? | ☐ Yes ☐ No* |
| 19.0 | Are spill supplies (absorbent, PPE, etc.) nearby, labeled and properly stocked? | ☐ Yes ☐ No* |
| 20.0 | Look closely at the two black, round emergency vents on top of the tank. Are they unobstructed and free of debris (such as bird nests, etc.)? | ☐ Yes ☐ No* |
| 21.0 | Is there a fire extinguisher in the immediate area, and is the inspection tag current (monthly check?) | ☐ Yes ☐ No* |
| 22.0 | Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan? | ☐ Yes ☐ No* |

SEE BELOW FOR ANY (No *) STATUS
SEE REVERSE FOR INSPECTION G

Condition or Status Notes/Comments:
Item #

Inspector Name & Signature: _____

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# SPCC Rule vs SPCC Plan

- …requirements & specifications for:

## 2. Procedural-based spill prevention (continued)

- Most are also *performance-oriented*

- **Drainage of containment areas (and written procedures)**
- **Prompt correction of visible leaks and prompt removal of discharge accumulations**
- **Discharge notification and response**
- **Countermeasures for discharge discovery, response and cleanup**



# SPCC Rule vs SPCC Plan

- …requirements & specifications for:

## 3. Administrative spill prevention

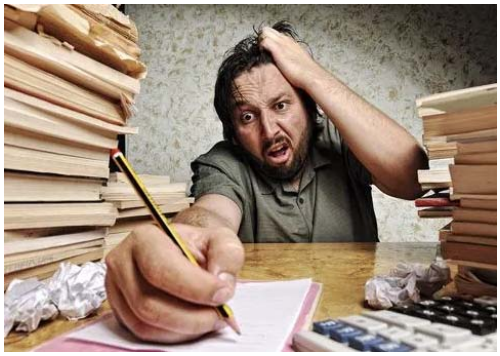
(112.3, .4, .5, .6, .7 & .8)

- **Regular, documented SPCC Plan review**
  - And amendment if necessary within a specified timeframe
- **Facility management review and certification of SPCC Plan**
- **Training of oil handling personnel**
- **Maintaining records of containment drainage events, inspections and integrity tests**
- **Emergency contact lists (facility, agency and contractor)**

## Based on what we just talked about…

- Anybody (*<u>any</u>*body, regardless of qualifications, knowledge or experience) may write/prepare an SPCC Plan (template or full plan [though a PE must certify the full plan]).

  Fact or crap?



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## I.N.O.M.


- Standards for Plan authorship?
  - Quality, clarity, detail, organization, etc.
- No *<u>rule-required</u>* pre-demonstration or proof of ability, achievability or feasibility
  - Have you ***<u>READ</u>*** your Plan?
- The facility and its personnel must be able to comply with the rule and implement whatever is written into the Plan
  - You need to fully understand what's being required by the rule and the facility's Plan
    - And the consequences of failure to implement (e.g. spill control or response)
  - Do not be afraid (or too cheap) to amend the Plan to better ensure ongoing compliance

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# Performance-Oriented, part deux

- **Mostly up to the facility to determine the appropriate, site-specific means of rule compliance**
  - Rule places faith in the compliance evaluations & determinations of the certifying management or PE's judgment
  - Rule places responsibility for implementation and accuracy on the facility owner/operator
- **Say what you're gonna do**
- **…and be sure you can actually do what you say you're gonna do!**
  - Don't just parrot the rule requirement without being able to comply
  - Same with blindly checking the affirmation check boxes on the template


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# Sufficient Content & Detail in the Written SPCC Plan?

- Rule requires certain content in the Plan
  - though the level of detail is somewhat subjective
- Plan must *describe*
  - oil handling operations,
  - spill prevention practices,
  - containment,
  - discharge or drainage controls,
  - the relevant industry standards (for inspections and integrity testing)
  - and the personnel, equipment and resources at the facility that are used to prevent oil spills from reaching navigable waters or adjoining shorelines

APSA…from impacting the environment/state resources

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# Sufficient Content & Detail in the Written SPCC Plan?

- In other words: Completely describe the measures in place at that facility to comply with each 40 CFR 112 rule requirement
- For the Qualified Facility template plans:
  - Pre-printed summary description of compliance requirements and associated check-the-box compliance affirmations
  - Fill-in-the-blank narrative sections
  - Fill-in-the-table tables


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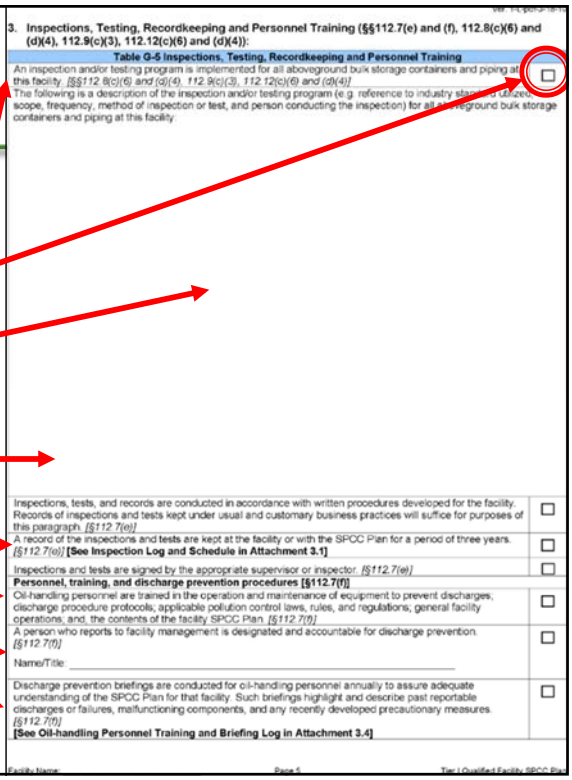
# Example from Tier 1 Template

- **G-5: Inspections, Testing, Recordkeeping & Personnel Training**
  - Affirmation of inspection & testing program
  - Required description of the inspection and testing program for bulk tanks/containers & piping
  - Requirement for written inspection & testing procedures
  - Recordkeeping requirements
  - Training requirements
  - Required name/title



3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)):

| Table G-5 Inspections, Testing, Recordkeeping and Personnel Training | |
|---|---|
| An inspection and/or testing program is implemented for all aboveground bulk storage containers and piping at this facility. *[§§112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)]* | ☐ |
| The following is a description of the inspection and/or testing program (e.g. reference to industry standards utilized, scope, frequency, method of inspection or test, and person conducting the inspection) for all aboveground bulk storage containers and piping at this facility: | |
| Inspections, tests, and records are conducted in accordance with written procedures developed for the facility. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph. *[§112.7(e)]* | ☐ |
| A record of the inspections and tests are kept at the facility or with the SPCC Plan for a period of three years. *[§112.7(e)]* **[See Inspection Log and Schedule in Attachment 3.1]** | ☐ |
| Inspections and tests are signed by the appropriate supervisor or inspector. *[§112.7(e)]* | ☐ |
| **Personnel, training, and discharge prevention procedures [§112.7(f)]** | |
| Oil-handling personnel are trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan. *[§112.7(f)]* | ☐ |
| A person who reports to facility management is designated and accountable for discharge prevention. *[§112.7(f)]* Name/Title: _____ | ☐ |
| Discharge prevention briefings are conducted for oil-handling personnel annually to assure adequate understanding of the SPCC Plan for that facility. Such briefings highlight and describe past reportable discharges or failures, malfunctioning components, and any recently developed precautionary measures. *[§112.7(f)]* **[See Oil-handling Personnel Training and Briefing Log in Attachment 3.4]** | ☐ |

Facility Name Page 5 Tier I Qualified Facility SPCC Plan

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# Whether Writing the Plan, or Verifying the Plan is Complete

- Side by side comparison with the rule and the **appropriate** checklist
- **Required**
  - Plan follows sequence of 40 CR 112 rule OR must have rule vs Plan cross reference
- **Recommended** (by Uncle Steve)
  - Detailed Table o' Contents
    - Similar section headings as the rule…and include the rule cite
  - Make sure you can locate in your Plan where it addresses ALL relevant rule requirements
    - Look at rule/checklist - then finding it in the Plan body & appendices
      - Not just rule/checklist – then just looking at a Plan Table o' Content (i.e. don't assume)



# Plan Sequence vs Cross Reference

- Either way is allowed, but
- Rule sequence (IMO) can make it easier to verify Plan addresses each applicable rule requirement
  - Still need to have sufficient detail and accuracy, regardless of format
- Also makes agency review that much quicker

**REGULATORY CROSS REFERENCE**

| PROVISION OF 40 CFR | SPCC PLAN REQUIREMENT | SECTION # |
|---|---|---|
| 112.3(d) | Professional Engineer Certification | Page vii |
| 112.3(e) | Location of SPCC Plan | Page 3 |
| 112.5 | Plan Review | Appendix D |
| 112.7 | Management Approval | Page viii |
| 112.7 | Cross-Reference with SPCC Rule | Appendix B |
| 112.7(a)(3) | General Facility Information and Site Plans and Oil Storage Locations | Section 1 Appendix A |
| 112.7(a)(3)(iv) | Spill Response Procedures | Section 4 |
| 112.7(a)(3)(v) | Waste Disposal | Section 4.1 |
| 112.7(a)(3)(vi) | Emergency Contacts and Agency Notification | Section 4.2 |
| 112.7(a)(4) & (5) | Response Procedures | Section 4.1, 4.2 |
| 112.7(b) | Prediction of Potential Failure Modes | Section 2 Table 2 |
| 112.7(c) | Containment and Diversionary Structures | Section 3.2.1 |
| 112.7(d) | Contingency Planning | Not Applicable |
| 112.7(e) | Inspections, Tests, and Recordkeeping | Section 3.1.3 Appendix H,I,J |
| 112.7(f) | Employee Training and Discharge Prevention Procedures | Section 3.1.2 Appendix I |
| 112.7(g) | Security | Section 3.1.4 |
| 112.7(h) | Loading/unloading | Section 2.1, 3.1.1 |
| 112.7(i) | Brittle Fracture Evaluation (Shop-built containers). | Not Applicable |
| 112.7(j) | Conformance with Applicable State and Local Requirements | Section 1 |
| | | Section 2.2 (Not |

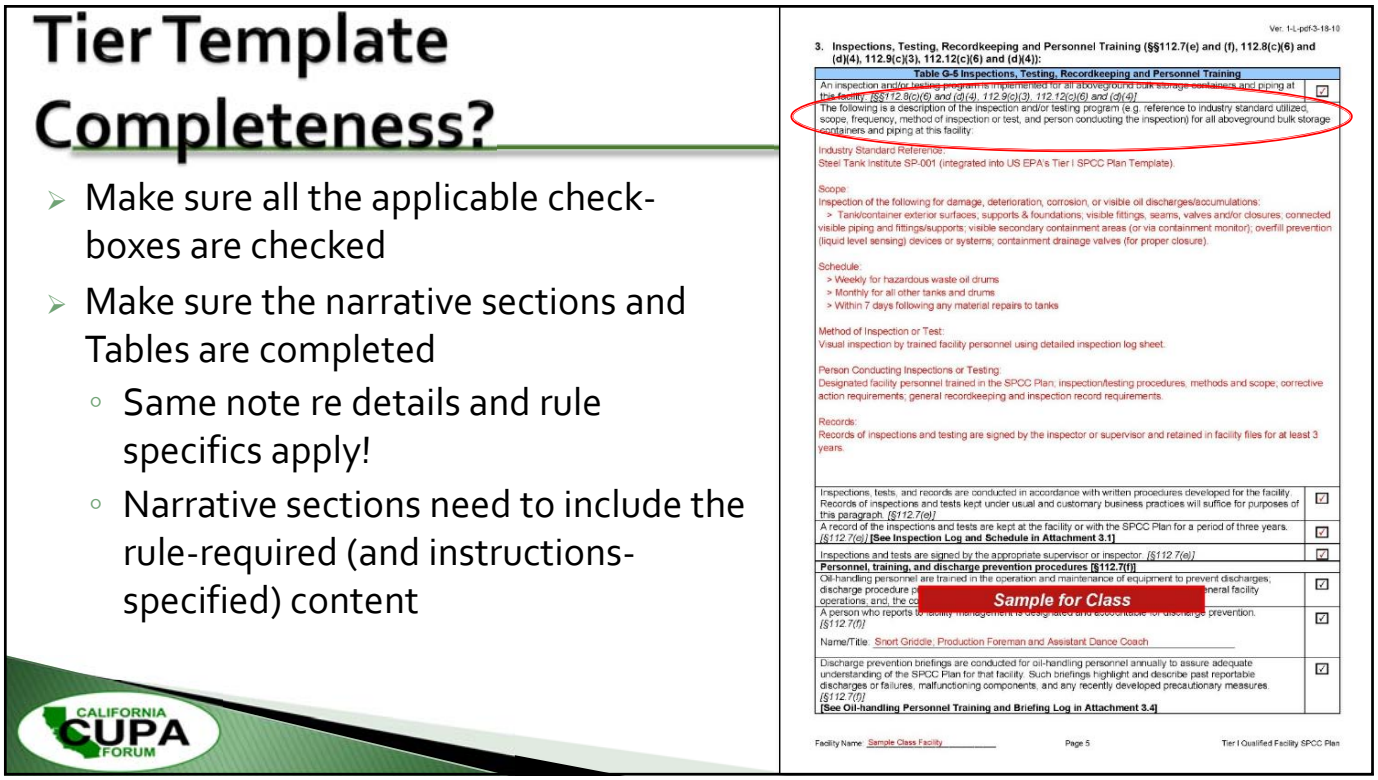
# Sequential

**SPCC PLAN TABLE OF CONTENTS**



# Tier Template Completeness?

- Make sure all the applicable check-boxes are checked
- Make sure the narrative sections and Tables are completed
  - Same note re details and rule specifics apply!
  - Narrative sections need to include the rule-required (and instructions-specified) content



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**3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)):**

| Table G-5 Inspections, Testing, Recordkeeping and Personnel Training | |
|---|---|
| An inspection and/or testing program is implemented for all aboveground bulk storage containers and piping at this facility. *[§§112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)]* | ☑ |
| The following is a description of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequency, method of inspection or test, and person conducting the inspection) for all aboveground bulk storage containers and piping at this facility:<br>Industry Standard Reference:<br>Steel Tank Institute SP-001 (integrated into US EPA's Tier I SPCC Plan Template).<br><br>Scope:<br>Inspection of the following for damage, deterioration, corrosion, or visible oil discharges/accumulations:<br>> Tank/container exterior surfaces, supports & foundations; visible fittings, seams, valves and/or closures; connected visible piping and fittings/supports; visible secondary containment areas (or via containment monitor); overfill prevention (liquid level sensing) devices or systems; containment drainage valves (for proper closure).<br><br>Schedule:<br>> Weekly for hazardous waste oil drums<br>> Monthly for all other tanks and drums<br>> Within 7 days following any material repairs to tanks<br><br>Method of Inspection or Test:<br>Visual inspection by trained facility personnel using detailed inspection log sheet.<br><br>Person Conducting Inspections or Testing:<br>Designated facility personnel trained in the SPCC Plan; inspection/testing procedures, methods and scope; corrective action requirements; general recordkeeping and inspection record requirements.<br><br>Records:<br>Records of inspections and testing are signed by the inspector or supervisor and retained in facility files for at least 3 years. | |
| Inspections, tests, and records are conducted in accordance with written procedures developed for the facility. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph. *[§112.7(e)]* | ☑ |
| A record of the inspections and tests are kept at the facility or with the SPCC Plan for a period of three years. *[§112.7(e)]* **[See Inspection Log and Schedule in Attachment 3.1]** | ☑ |
| Inspections and tests are signed by the appropriate supervisor or inspector. *[§112.7(e)]* | ☑ |
| **Personnel, training, and discharge prevention procedures [§112.7(f)]** | |
| Oil-handling personnel are trained in the operation and maintenance of equipment to prevent discharges; discharge procedure p… …neral facility operations; and, the co… | ☑ |
| A person who reports to facility management is designated and accountable for discharge prevention. *[§112.7(f)]*<br>Name/Title: Short Griddle; Production Foreman and Assistant Dance Coach | ☑ |
| Discharge prevention briefings are conducted for oil-handling personnel annually to assure adequate understanding of the SPCC Plan for that facility. Such briefings highlight and describe past reportable discharges or failures, malfunctioning components, and any recently developed precautionary measures. *[§112.7(f)]*<br>**[See Oil-handling Personnel Training and Briefing Log in Attachment 3.4]** | ☑ |

**Sample for Class**

Facility Name: Sample Class Facility Page 5 Tier I Qualified Facility SPCC Plan

- These are good – meets rule requirements
  - Be careful about going short on detail
    - State the standard used, personnel doing inspections, frequency, and summary scope

**3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)):**

| Table G-5 Inspections, Testing, Recordkeeping and Personnel Training | |
|---|---|
| An inspection and/or testing program is implemented for all aboveground bulk storage containers and piping at this facility. *[§§112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)]* | ☒ |

The following is a description of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequency, method of inspection or test, and person conducting the inspection) for all aboveground bulk storage containers and piping at this facility:

***Inspections, Testing, Recordkeeping***

- Designated CSUDH staff are trained to do visual inspections of oil storage, oil transfer areas, and oil equipment. A designated trained staff performed periodic visual inspections of the aboveground oil storage containers and oil-filled operational equipment using Attachment 3.1 to document inspections; records of inspections consist of the monthly inspection checklist and the annual inspection checklist in the Steel Tank Institute (STI) SP001 inspection standard. Visual inspections of oil storage containers follow the inspection schedule in Attachment 3.2 of this plan.
- The liquid level gauges on the unleaded gasoline tanks at the Facility Services are inspected and calibrated at least annually following the manufacturer's procedures by an outside vendor. Attachment 3.1 documents these inspections.
- An assigned employee also visually inspects the dispensers on the unleaded gasoline and diesel oil tanks at the Facility Services for indications of deterioration and discharges, including the transfer hoses, valves, and other fittings, at least weekly following the manufacturer's procedures.
- Designated CSUDH staff will inspect concrete berm secondary containment(s) and secondary containment pallet(s) on a weekly basis for signs of deterioration, discharges (leaking tanks or piping), or accumulation of oil. In addition, staff will inspect the exterior containment(s) after any rainfall. Inspections will be documented using Attachme If the containment does not have drains, any collected rainwater will be removed from the containment u portable pump, but only after sampling the water for analysis of hydrocarbons. If the laboratory reports the pr of hydrocarbons, or oil sheen is detected, then a waste oil hauler will be contracted to transport the oily rainw proper disposal. Each drainage activity is recorded in Attachment 3.3. Record keeping for disposal of waste o contaminated water accumulated in the concrete berm containment area is in Attachment 3.3.
- Emergency generators are inspected by an outside vendor biannually for filters, hoses, caps, leaks, locks, ar changes. The generators are "test run" monthly. All inspection and test records are signed and kept on file.
- Elevators are serviced monthly by an outside vendor and as needed. Inspections include inspecting for signals, emergency lighting, leaks, oil level, controller, motor, etc. Internal inspections are also perforr designated trained CSUDH staff on a weekly basis for signs of deterioration or discharges (leaking tanks or pi valves). Inspections will be documented using Attachment 3.1.
- Transformers are serviced as needed by an outside vendor. Inspections for transformers are completed on a basis for signs of deterioration or discharges (leaking tanks or piping or valves). Inspections will be documente Attachment 3.1.
- If an employee encounters a spill during an inspection of the oil storage, operational or transfer equipmen, the employee will immediately take the necessary actions outlined in Table G-7.

| Table G-5 Inspections, Testing, Recordkeeping and Personnel Training | |
|---|---|
| An inspection and/or testing program is implemented for all aboveground bulk storage containers and piping at this facility. *[§§112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)]* | ☒ |

The following is a description of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequency, method of inspection or test, and person conducting the inspection) for all aboveground bulk storage containers and piping at this facility:

1) A visual inspection of the aboveground oil storage containers, including piping and fuel transfer lines, is conducted monthly by the IBBR Safety Coordinator. The inspection complies with the Steel Tank Institute (STI) SP001 industry standard and is documented using Attachment 3.1.

2) A visual inspection of the other bulk oil storage containers to check for signs of deterioration and possible discharges is conducted monthly by the IBBR Safety Coordinator and is documented using Attachment 3.1.

3) Hydraulic oil elevator tanks are visually inspected monthly by IBBR staff. Additionally, Eastern Elevator (contractor) inspects the hydraulic oil tanks annually. All inspections of the hydraulic oil tanks are documented using Attachment 3.1

4) If a discharge is detected during an inspection of the oil storage or transfer equipment, the Facilities Manager will be notified and they will immediately take the necessary actions that are outlined in Table G-7.

# Example from a PE-Cert. Plan

### 5.7 INSPECTIONS, TESTS AND RECORDS [§112.7 (e)]

**§ 112.7 General requirements for Spill Prevention, Control, and Countermeasure Plans.**
(e) Inspections, tests, and records. Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.

***General***
Formal, written inspections of all aboveground fixed stationary bulk tanks and associated piping and leak detection systems, portable bulk containers, emergency response equipment, and the associated containments and transfer areas are conducted in accordance with facility-specific written inspection procedures (summarized below). The written log/record of these inspections is an integral part of the written procedure. The formal inspections are conducted on a minimum monthly basis, with any hazardous waste containers inspected on a weekly basis. A more detailed annual inspection of ASTs #1 and #2 is also conducted.

Facility personnel may conduct more frequent informal inspections ranging from daily to weekly.

Fleet Services Department personnel typically conduct the inspections of ASTs #1 and #2 and the oil drums in Building F; Water Department personnel typically conduct the inspections of the remaining SPCC-regulated tanks and containers.

***Written Inspection Procedures***
The inspection procedures are included as an integral part of the inspection log or inspection form itself. Additional inspection detail may be contained in various

be adequate in accordance with good engineering practices, and with consideration of relevant industry standards. The reviewing/certifying Professional Engineer has determined that the inspection criteria/protocols used are consistent with the Steel Tank Institute's SP-001 inspection standard (6th Edition). SP-001 forms are not required to be used.

Reference/sample copies of these written procedures and associated inspection log forms are contained in Appendix 5 (the most recent versions for all SPCC-captured equipment are maintained in facility files). The samples contained in this Plan appendix are illustrative only.

***Inspection Results, Follow-Up and Records***
Observation results are recorded on the relevant inspection logs for all tanks and non-waste drums, and for hazardous wastes – the Weekly Hazardous Waste Accumulation

***Frequency***
Formal, written SPCC-related inspections are performed on the following minimum basis:

- Monthly: Stationary and portable fuel tanks (and associated piping, hoses, loading areas, etc.), and 55-gallon oil product drums;
- Weekly: Hazardous waste drums

Informal, undocumented visual inspections may also be conducted on a daily to weekly frequency depending upon the container/tank/equipment type and interdepartmental/ operational policy. A more detailed annual inspection of ASTs #1 and #2 is also conducted.

The frequency of the inspections have been determined to be in accordance with good engineering practices and conformant to relevant industry standards.

***Qualifications of Personnel Conducting Inspections***
The Water Department and Fleet Services Department personnel conducting these inspections are considered qualified to perform these inspections by virtue of their knowledge of oil storage tank, container and oil-filled equipment/system operations, the

# Key Elements of SPCC Plans

- Facility diagram and description of the facility and oil tanks, containers, *oil-filled equipment, handling/transfer areas*
  - Tier 1 template has a table for listing stuff and no diagram required
- Oil discharge predictions (failure analysis)
- Description of the secondary containment or diversionary structures or equipment, and discharge/drainage controls
  - Tier 1 template has a check-box affirmation
  - Sized for bulk containers/tanks
  - General for all other oil handling/using equipment, systems, handling & transfer areas
    - Be careful here…can you realistically do what you say?



# Key Elements of SPCC Plans

- Description of facility drainage/ discharge and drainage controls
  - Tier 1 – checkbox; Tier 2 template needs a narrative
- Description of site/oil area security
- Procedures & schedules for tank & equipment inspections and integrity testing
- Description of overfill prevention systems and methods
  - Tier 1 & 2 - checkbox
- Procedures for routine oil handling & transfers

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# Key Elements of SPCC Plans

- Description of and procedures for tank car & tank truck loading/unloading racks (IF there are racks)
- Description of personnel training and annual oil discharge prevention briefings
  - Tier 1 & 2 - checkboxes
- Description of how required records will be kept
  - Tier 1 & 2 - checkboxes
- Description of the required five-year Plan review by facility
  - Tier 1 & 2 - checkboxes

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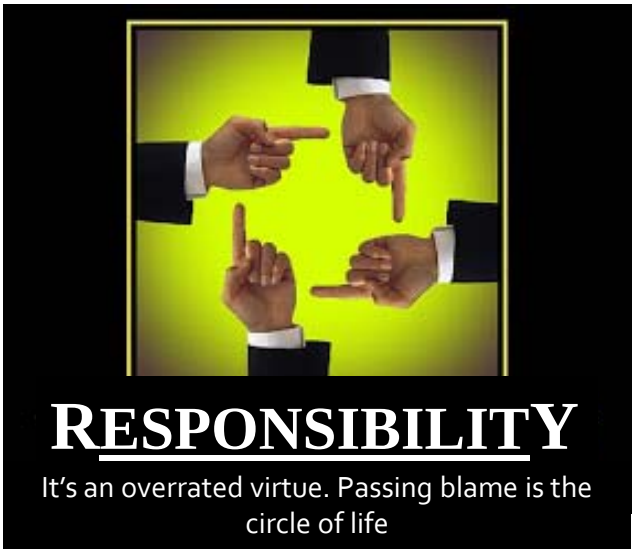
# Key Elements of SPCC Plans

- Management approval and commitment
- Plan certification by a Professional Engineer (PE) or facility O/O (for Qualified Facilities)

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# Plan Complete??

- This Plan is VERY short on detail and does not have all specific elements required by the rule

TABLE OF CONTENTS



**INSPECTIONS**

As part of the ongoing administration of the SPCC Plan, an inspection of the facility's fuel storage tank system must be conducted on a monthly basis using the **Facility Inspection Checklist** provided in **Appendix A**. A written copy of this inspection checklist must be maintained with the plan at the facility for a period of three years.

| | |
|---|---|
| Appropriate qualifications for personnel performing tests and inspections are identified in the Plan and have been assessed in accordance with industry standards | ☐ Yes ☐ No |
| The frequency and type of testing and inspections are documented, are in accordance with industry standards and take into account the container size, configuration and design | ☐ Yes ☐ No |

# Complete *(and narrative text contains the specific descriptions/content required by the rule)*

***Relevant Industry Standards***

The bulk containers [redacted] Wind Farm subject to integrity testing are all shop-fabricated tanks, are of maximum 350 gallon capacity, and equipped with secondary containment and continuous release detection means. None are partially buried. The portable containers are constructed of steel, and equipped with secondary containment and continuous release detection means.

After taking into account the size, configuration, and design of the bulk tanks and containers, the reviewing/certifying professional engineer and [redacted] Wind Farm has determined that most relevant industry standard for integrity testing of the steel tanks and containers is the Steel Tank Institute (STI) "Standard for the Inspection of Aboveground Storage Tanks" SP001, 5th Edition.

***Qualifications for Personnel Performing Tests and Inspections***

As required STI SP001 Sections 6.2 and 4.1, the P[redacted] Wind Farm personnel performing the inspections (the 'tank owner's inspector') possess the following qualifications:

- Knowledge of storage facility operations;
- Knowledge/familiarity of the types of containers and tanks and their associated components; and
- The characteristics of the liquids stored.

Additionally, inspection personnel also possess knowledge of inspection procedures, inspection criteria and corrective action requirements. Facility inspection personnel have received training in inspection requirements.

# *Read* the Rule… don't skim

- Some sections direct you to discuss, describe or 'address' your facility's compliance:

**§112.7 General requirements for Spill Prevention, Control, and Countermeasure Plans.**

paragraphs, and must explain separately the details of installation and operational start-up. As detailed elsewhere in this section, you must also:

(a)(1) Include a discussion of your facility's conformance with the requirements listed in this part.

(3) Describe in your Plan the physical layo

You must also address in your Plan:

(ii) Discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.);

(iii) Discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge;

# *Read* the Rule… don't skim

- Some sections direct you to comply (but doesn't *explicitly* tell you to describe or discuss):

**§112.8 Spill Prevention, Control, and Countermeasure Plan requirements for onshore facilities (excluding production facilities).**

If you are the owner or operator of an onshore facility (excluding a production facility), you must:

(2) Construct all bulk storage tank installations (except mobile refuelers and other non-transportation-related tank trucks) so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an

- But… 112.7 does require that "You must prepare the Plan in writing"
  - **The implied requirement is that you write out in the Plan how you are complying.**

- For clarity, we simply added SW or DW to the Tier 1 template table

**III. Plan Requirements**

**1. Oil Storage Containers (§112.7(a)(3)(i)):**

**Table G-2 Oil Storage Containers and Capacities**

This table includes a complete list of all oil storage containers (aboveground containers[a] and completely buried tanks[b]) with capacity of 55 U.S. gallons or more, unless otherwise exempt from the rule. For mobile/portable containers, an estimated number of containers, types of oil, and anticipated capacities are provided. ☒

| Oil Storage Container *(indicate whether aboveground (A) or completely buried (B))* | Type of Oil | Shell Capacity (gallons) * |
|---|---|---|
| Mobile Refueler - Jet A (Truck 77) - (A) | Jet A (kerosene) | 2,000 (SW) |
| Mobile Refueler - AvGas 100LL - (A) | Aviation gasoline | 500 (SW) |
| Used Oil Tank - (A) | Used oils | 300 (DW) |
| Fuel/Oil Drums - Maintenance Bay Interior - (A) | New/waste kerosene & misc. oils | 55 ea (15 drums max) |
| Fuel/Oil Drums - Maintenance Bay Exterior - (A) | New/waste kerosene, diesel & oils | 55 ea (10 drums max) |
| | | |
| Jet A UST - (B) | Jet A | 12,000 (DW) |
| AvGas 100LL UST - (B) | Aviation gasoline | 12,000 (DW) |

* *SW = Single wall container*
*DW = Double walled container*

Total Aboveground Storage Capacity [c] 4,175 gallons
Total Completely Buried Storage Capacity 24,000 gallons
Facility Total Oil Storage Capacity 28,175 gallons

- We added SW or DW to the Tier 2 template table also
- Many plans 'forget' to include OFE and mobile fuelers

**2. Oil Storage Containers (§112.7(a)(3)(i)):**

**Table G-3 Oil Storage Containers and Capacities**

This table includes a complete list of all oil storage containers (aboveground containers[b] and completely buried tanks[c]) with capacity of 55 U.S. gallons or more, unless otherwise exempt from the rule. For mobile/portable containers, an estimated number of containers, types of oil, and anticipated capacities are provided.

Include bulk tanks and containers (stationary and portable), oil-filled equipment, and oil-filled electrical equipment. ☒

NOTE: The table also includes the SPCC/APSA-excluded completely buried USTs (slop UST, 3 x 20K, and the two 12K gallon USTs)

| Oil Storage Container *(indicate whether aboveground (A) or completely buried (B))* | Type of Oil | ID Code *(from Table G-2)* | Shell Capacity (gallons) |
|---|---|---|---|
| Gasoline Mobile Refueler 95- (A) | Gasoline | 95 | 2,000 (SW) |
| Gasoline Truck Bed Mobile Refueler - (A) | Gasoline | Truck Bed | 115 (SW) |
| Diesel Mobile Refueler 85 - (A) | Diesel fuel | 85 | 1,500 (SW) |
| Diesel Mobile Refueler 750 gal - (A) | Diesel fuel | 750 gal | 750 (SW) |
| Used Oil AST - 1 - (A) | Used motor/lube oils | AST-1 | 500 (DW) |
| Product & Waste Fuel & Oil/Lubricant Drums - (A) | Jet A, gas, diesel, | Storage Container | 10 max x 55 = 550 |
| | lube, hydr. oils | A and B | |
| Jet Fuel Filters (OFE) - (A) | Jet A | JFF | ~60 x 3 = 180 |
| Slop/Waste Jet A UST - (B) | Waste Jet A | Fueling Rack | 500 (DW) |
| Jet A UST - (B) | Jet A | Fueling Rack | 20,000 x 3 (DW) |
| Gasoline UST - (B) | Gasoline | Fueling Rack | 12,000 (DW) |
| Diesel fuel UST - (B) | Diesel fuel | Fueling Rack | 12,000 (DW) |

*SW = Single wall container*
*DW = Double walled container*

Total Aboveground Oil Storage Capacity [d] gallons
Total Completely Buried Oil Storage Capacity gallons
Facility Total Oil Storage Capacity gallons

tanks, containers and equipment (additional details regarding capacity, construction, containment and overfill protection are presented in Section 5.0, Table 5-1):

- **Bulk Tanks/Containers – Fixed-Stationary**
  - Sized secondary containment is provided for all of the following aboveground stationary bulk tanks/containers.
  - Total facility capacity: 73,193 gallons

  - Units 1-4 utilize two 6,450 gallon single wall steel tanks containing lube/turbine oil used to lubricate the generating unit turbines. Both tanks are used for Clean Oil (which is piped as-needed to the four lube oil reservoir systems). A third steel tank, capacity 10,293 gallons is used to store "dirty" oil (which is cleaned/conditioned on site and returned back to service). The three tanks are located within a sized concrete floored, masonry walled secondary containment diked area. Distribution of oil throughout the generating units is via steel pipelines within the floor drain/retention basin-protected unit structures.

  - Units 5-6 have two 25,000 gallon capacity single wall steel tanks containing lube/turbine oil used to lubricate the generating unit turbines. One tank is used for fresh (newly delivered) product (which is piped as-needed to the two lube oil reservoir systems) and one for in-use oil (i.e. a temporary holding tank for in-use oil to be reused). These tanks are co-located within a sized concrete floored, concrete masonry secondary containment dike area with a total capacity of 7,000 gallons and the containment area drains to a facility oil/water separator system and then to the approximately 750,000-gallon North Retention Basin. Distribution of this oil throughout the generating units is via steel pipelines within the floor drain/retention basin-protected unit structures.

- **Bulk Tanks/Containers – Portable Containers**
  - Sized secondary containment is provided for all of the following portable bulk

steel pipelines within the floor drain/retention basin-protected unit structures.

- **Bulk Tanks/Containers – Portable Containers**
  - Sized secondary containment is provided for all of the following portable bulk tanks/containers (with adequate freeboard for or other protection from precipitation), and all portable containers are positioned to prevent a discharge to navigable waters.
  - Total facility capacity: 6,160 gallons

  - An average of twenty-five (25) (with a maximum of fifty (50)) 55-gallon drums of lubricating and gear oils (and some hydraulic oils/fluids and other petroleum products) stored within enclosed fire-rated, steel secondary containment storage units located adjacent to Units 1-2.
  - A maximum of ten (10) 55 gallon drums containing lubricating oils and hydraulic fluid or other petroleum products stored under each of the three generating unit structures. These drum storage/dispensing areas are either equipped with curbed/bermed secondary containment, portable spill containment pallets, or containment via the facility unit drain system (oil collection sumps, and drainage lines leading to the appx. 750,000-gallon North Retention Basin).
  - A maximum of six (6) 55 gallon drums containing lubricating oils and hydraulic fluid or other petroleum products periodically used for short-term/temporary maintenance-related stored within plastic containment pallets or within existing

➢ Good, complete narrative descriptions aid in facility and inspector understanding
  - And sometimes technical change awareness for facility over time

- **Bulk Tanks/Containers – Fixed/Stationary**
  - Sized secondary containment is provided for all of the following bulk tanks/containers
  - One (1) integral double-walled UL-2085 shop-fabricated steel AST containing diesel fuel with a capacity of 8,000 gallons located near the southwest corner of the facility (AST #1). This tank is used, in part, to refill via a hand-operated dispenser nozzle the portable equipment and other diesel-fueled vehicles. The tank is also directly piped via secondarily-contained and trenched piping to the double-walled 275-gallon day tank in the adjacent emergency generator building (Building F). The AST interstice is electronically monitored for leaks, and the tank electronically monitored for fuel level and overfills.
  - One (1) integral double-walled UL-142 shop-fabricated steel AST containing diesel fuel with a capacity of 275 gallons located within the emergency generator building (Building F) near the southwest corner of the facility (AST #2). The tank, fed from the 8,000-gallon AST, serves a large emergency diesel generator which powers the overall facility in the event of a power outage. The AST interstice is electronically monitored for leaks, and the tank electronically monitored for fuel level and overfills. Piping to this tank in the building is located within a concrete containment trench.
  - One (1) integral double-walled UL-listed shop-fabricated walled steel AST containing diesel fuel with a capacity of 125 gallons. The tank is a base tank integral to an emergency diesel electrical generator located outside the northwest corner of the Laboratory/Operations Building (Building A). This generator supplies power to this building in the evet of a power outage. The AST interstice is electronically monitored for leaks, and the tank electronically monitored for fuel level and overfills.

➢ Good, complete narrative descriptions aid in facility and inspector understanding
  - And sometimes technical change awareness over time

- **Bulk Tanks/Containers – Portable**
  - Sized secondary containment is provided for all of the following bulk tanks/containers, and all portable containers are positioned to prevent a discharge to navigable waters.

  - Six portable diesel-fueled trailer-mounted water pumps, with single-walled fuel tanks ranging from approximately 56- to 159-gallon capacity (individual tank capacities are 56-, 80-, 90-, 117-, 125-, and 159-gallon). These trailers are parked within a large rising wall berm 'portable' secondary containment system located along the northeast end of the facility. Containment monitoring is via monthly visual inspection. The containment is sufficient for the capacity of the largest tank within plus 24 hours of a 25-year storm event.

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| Tank ID and Description | General Location | Oil Storage Capacity (gals)[5] | Contents | Containment or Discharge/Drainage Control Type; Overfill Protection | Notes |
|---|---|---|---|---|---|
| **BULK TANKS AND CONTAINERS** | | | | | |
| **AST #1**<br>Diesel Tank<br><br>Steel, double wall UL-2015 Stationary<br><br>Mfr: Modern Welding March 2015 | North of Generator Building F | 8,000 | Diesel fuel | • **Containment Type:** Sized (40 CFR 112.8(c)(2)).<br>• **Containment Description:** Integral double wall. Concrete curbing (piping/hose general containment): 12'x30'x0.75". Supply/return piping double walled from tank to Building F.<br>• **Overfill Protection:** Visual verification and communication ('fast response system') via Morrison clock gauge during filling activities. Tank also monitored via Veeder Root system - electronic inventory reading + visual and audible high level alarm (40 CFR 112.8(c)(8)) | **Leak Detection:**<br>▪ Electronic monitor |
| **AST #2**<br>Generator Diesel Day Tank<br><br>Steel, double wall UL-listed Stationary<br><br>Mfr: Simplex 2015 | Inside Generator Building F | 275 | Diesel fuel | • **Containment Type:** Sized (40 CFR 112.8(c)(2)).<br>• **Containment Description:** Integral double wall. Supply/return piping to AST #2 and from AST #2 to generator in containment trench.<br>• **Overfill Protection:** Electronic level control system on tank (closed tank supply/retun system); back up visual verification via analog float type level gauge (40 CFR 112.8(c)(8)) | **Leak Detection:**<br>▪ Electronic monitor |
| **Lab/Ops EDG**<br>Generator diesel base tank<br><br>Steel, double wall UL-listed Stationary | 100 kW Generator outside NW corner Laboratory/ Operations Building (Bldg A) | 125 | Diesel fuel | • **Containment Type:** Sized (40 CFR 112.8(c)(11).<br>• **Containment Description:** Integral double wall.<br>• **Overfill Protection:** Visual verification via analog gauge and communication during filling activities. (40 CFR 112.8(c)(8)) | **Leak Detection:**<br>▪ Electronic monitor |

| Tank ID and Description | General Location | Oil Storage Capacity (gals)[5] | Contents | Containment or Discharge/Drainage Control Type; Overfill Protection | Notes |
|---|---|---|---|---|---|
| Mfr: Pryco 1995 | | | | | |
| **Water Pump (Pioneer)**<br>(Asset #5133)<br><br>Trailer-mounted diesel fueled water pump<br><br>Steel, single wall | Portable Equipment Parking Area 1 (PEPA 1)<br><br>Northeast end of facility | 125 | Diesel fuel | • **Containment Type:** Sized (40 CFR 112.8(c)(11).<br>• **Containment Description:** Portable, rising-wall containment berm appx. 10'x50'x1' = 3,740 gallons.<br>• **Overfill Protection:** Visual verification via analog gauge and communication during filling activities (40 CFR 112.8(c)(8)) | **Leak Detection:**<br>▪ Electronic monitor |
| **New Wash-down Pump (Premier)**<br>(Asset #5143)<br><br>Trailer-mounted diesel fueled water pump<br><br>Steel, single wall | Portable Equipment Parking Area 1 (PEPA 1)<br><br>Northeast end of facility | 80 | Diesel fuel | • **Containment Type:** Sized (40 CFR 112.8(c)(11).<br>• **Containment Description:** Portable, rising-wall containment berm appx. 10'x50'x1' = 3,740 gallons.<br>• **Overfill Protection:** Visual verification via analog gauge and communication during filling activities (40 CFR 112.8(c)(8)) | **Leak Detection:**<br>▪ Visual into open containment |
| **Water Pump (Peerless)**<br>(Asset #4888)<br><br>Trailer-mounted diesel fueled water pump<br><br>Steel, single wall | Portable Equipment Parking Area 1 (PEPA 1)<br><br>Northeast end of facility | 56 | Diesel fuel | • **Containment Type:** Sized (40 CFR 112.8(c)(11).<br>• **Containment Description:** Portable, rising-wall containment berm appx. 10'x50'x1' = 3,740 gallons.<br>• **Overfill Protection:** Visual verification via analog gauge and communication during filling activities (40 CFR 112.8(c)(8)) | **Leak Detection:**<br>▪ Visual into open containment |
| **Refueling Trailer**<br><br>Trailer-mounted diesel tank and dispensing system<br><br>Steel, single wall | Portable Equipment Parking Area 1 (PEPA 1)<br><br>Northeast end of facility | 180 | Diesel fuel | • **Containment Type:** Sized (40 CFR 112.8(c)(11).<br>• **Containment Description:** Portable, rising-wall containment berm appx. 10'x50'x1' = 3,740 gallons.<br>• **Overfill Protection:** Visual verification via analog gauge and communication during filling activities (40 | **Leak Detection:**<br>▪ Visual into open containment |

## Resting Easy?

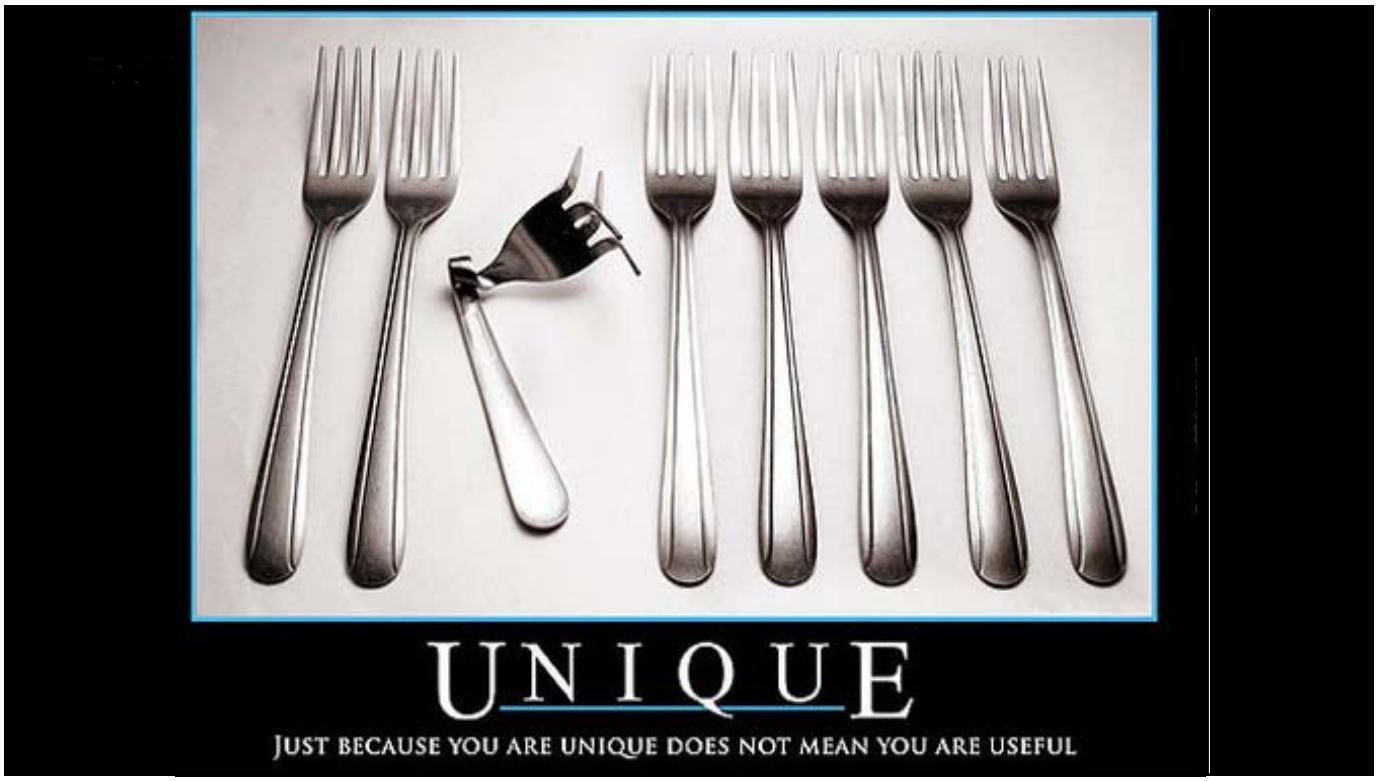
? A facility has a site-specific SPCC Plan, written just for that facility by someone that knows how to write a good SPCC Plan. That facility now has assurance that they will be in compliance with APSA and the SPCC rule?

**Fact or crap?**



## Plans Must Be:

- **Implementable**
  - **Can you actually *do* what the Plan is committing you to do?**
    - **In the specific manner in which the Plan states?**
      - **This is where the level of detail & accuracy is important!**
- **Implemented**
  - **Are you actually doing it?**
    - **Consistently and correctly?**




## Written Plan or Implementation Issues (may or may not be cited by the CUPA as a violation [most are]… but still indicates substandard Plan or compliance)

- **No Plan at all or various implementation failures**
  - A very general, all-encompassing violation
- **Names and phone numbers out of date**
- **SPCC Plan not maintained at the facility (or it can't be located)**
- **No procedures (or reference to or summary of) for routine oil handling, loading/unloading or transfers**
- **5 year Plan review not done or not documented**

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- Current?
- Is there a (gasp!) management of change process or system
  - 'Link' to CERS?
    - Or whenever CalOES changes names again

**EMERGENCY TELEPHONE NUMBERS – OIL SPILL:**

**Designated Staff Person Responsible for Oil Spill Prevention (implementation/administration):** [redacted] Director of Maintenance & Operations

*Alternate:* [redacted] Director of Transportation

| | |
|---|---|
| *Facility Emergency Coordinator* [redacted], Director of Maintenance & Operations | [redacted] 24h/Cell |
| *Alternate Emergency Coordinator* [redacted], Director of Transportation | [redacted] 24h/Cell |
| Outside Emergency Response – for fire, medical, emergency spill response, or releases that reach a storm drain or off-site/off-property | 9-1-1 |
| California Emergency Management Agency – State Warning Center (if release poses significant threat to health, safety , property or environment) | (800) 852-7550 or (916) 262-1621 |
| CUPA [Certified Unified Program Agency] Regulatory Notification (if threat to health, safety, property or environment): County of Riverside, Dept. of Environmental Health – Hazardous Materials Division | Riverside Office: (951) 358-5055 or Hemet Office: (951) 766-6524 |
| Regional Water Quality Control Board – Santa Ana Region (if spill/release poses threat to water or groundwater) | (951) 782-4130 |
| National Response Center (if any amount of oil, fuel or other petroleum reaches a storm drain, flood channel or the Santa Ana River) | (800) 424-8802 |

**APPENDIX A-2**

**FUEL UNLOADING PROCEDURE CHECKLIST**

Station Name: _____

Date: _____ Tank: _____

NWS Rep: _____ Supplier: _____

| X | Item | Description | Comments |
|---|---|---|---|
| | | **The following six items must be completed BEFORE fuel unloading.** | |
| | 1 | Ensure the audible high-level alarm system and automatic shutoff valve are functioning properly. | |
| | 2 | Determine the available capacity (ullage) of the above ground storage tanks (AST) by converting the reading on the fuel gauge to gallons (See Appendix A, Page A-1). This ullage should then be marked in the fueling log and communicated to the tank truck unloading contractor. | |
| | 3 | Move spill containment equipment such as booms or spill barriers into the unloading area. | |
| | 4 | Block the wheels of the tank truck. | |
| | 5 | Place drip pans under all pump hose fittings (if applicable) after the hose is hooked up to the AST and before unloading. | |
| | 6 | Ensure the fill nozzle is in place in the appropriate AST appurtenance. In this case, the fill nozzle is placed in the fill pipe connected to the round spill container. | |
| | | **The following two items must be completed DURING fuel unloading.** | |
| | 7 | Ensure that the NWS representative and the tank truck operator remain with the vehicle at all times during unloading. | |
| | 8 | Monitor the gauges on the AST and the truck continuously to ensure the ullage is not exceeded. If the audible high-level alarm sounds, stop the unloading of fuel immediately. | |
| | | **The following six items must be completed AFTER fuel unloading.** | |
| | 9 | Record the amount of fuel unloaded in the log (Appendix 1, page A-1). | |
| | 10 | Before removing the fill hose from the AST, ensure that it is drained and that all drain valves are closed (if applicable). | |
| | 11 | Pour any fuel in the drip pans, tank truck containment pool, or spill container on the fill pipe into the AST (if it has the capacity) or dispose of appropriately (describe how it was disposed of, if applicable). | |
| | 12 | Inspect the tank truck before removing the blocks to ensure the lines have been disconnected from the AST. | |
| | 13 | Remove the blocks from the tank truck wheels. | |
| | 14 | Place a copy of this fuel-unloading checklist in the SPCC Plan folder. | |

**Additional Comments Below:**

**Written procedures for routine transfers, loading, unloading**

[redacted]

**Oil Drum & Tote Receiving, Handling, Movement, and Storage Procedure**

This procedure applies to the following activities associated with the handling of 55 gallon drums and 220 – 375 gallon Intermediate Bulk Containers (totes) of oils, lubricants and solvents:

- Receipt of drums into the loading dock or roll-up doors;
- Movement and transfer of the drums and totes through the warehouse;
- Storage of drums and totes;
- Staging of excess drums within cargo semi-trailer outside the northeast roll-up door; and
- Loading of drums onto cargo trailers for external distribution.

This procedure is intended to prevent damage to containers and spills of oils, and to ensure compliance with the Spill Prevention, Control and Countermeasures (SPCC) Plan.

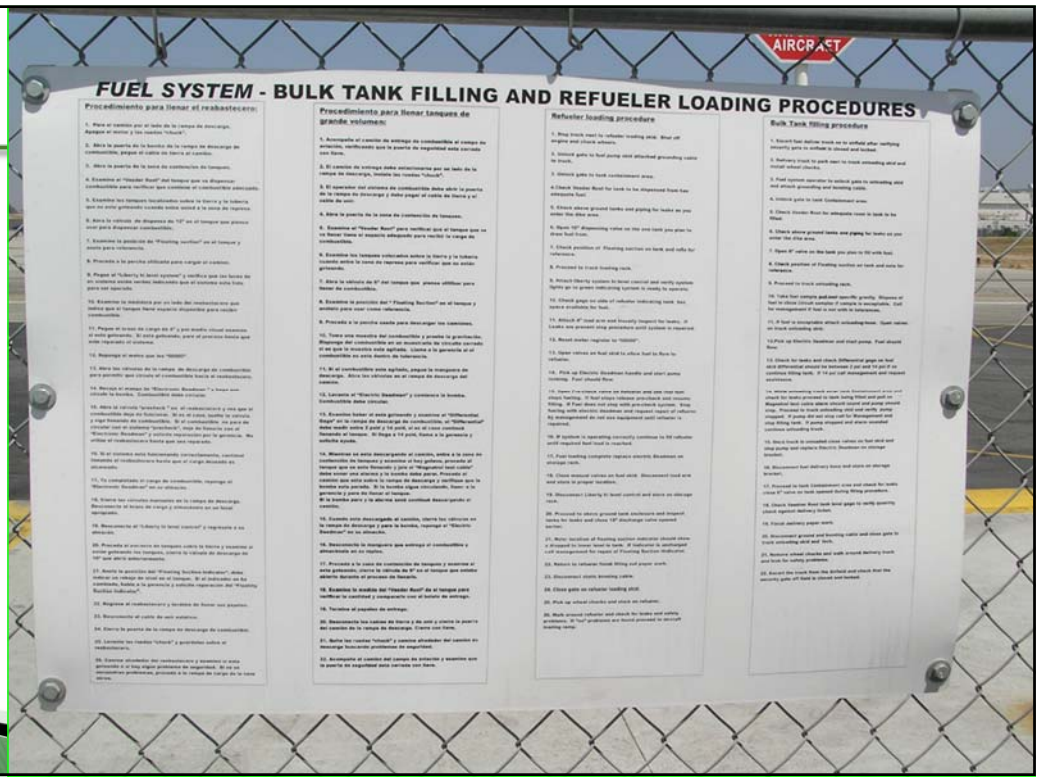
**Receipt of drums and tote containers:**

- ☐ Whenever possible, deliveries of oil drums and totes should not take place during rain events. Spillage at the loading dock or roll-up doors during rain events are much more difficult to control and prevent releases of oils into storm water.
  - ○ If deliveries during the rain event cannot be rescheduled or delayed, additional caution must be used whenever unloading the trailer/truck and moving the drums. Personnel should remain aware and ready to contain the spill in the truck well or at the roll-up door if any accident or drum release occurs.
- ☐ Receiving personnel should look to verify the presence and clear access to spill supplies and verify that the dock drain pump switch is locked in the OFF position.
- ☐ The delivery driver must back as tight as possible to the loading dock rams to minimize gaps between the warehouse and the truck. Wheel chocks and brakes must be applied.
- ☐ Immediately upon the truck cargo door being opened or stake-bed back removed, personnel should inspect the drums and totes while still in the vehicle to look for signs of leakage or spills, damaged containers and proper and tight factory seals. This inspection must occur before moving the drums to the warehouse storage drum area.
  - ○ For drums located further into the cargo area, this inspection should occur after the drums in front are inspected and moved out of the truck.
  - ○ Drums which appear damaged, unsealed, or leaking should NOT be unloaded from the vehicle. Call for supervision for instructions.
- ☐ The truck should be loaded or unloaded by GoldenWest employees. If the delivery driver loads or unloads any drums, a GoldenWest employee must be in the immediate area and be supervising the driver's actions.
- ☐ Drums should be relocated/moved to their storage location as soon as possible after delivery and initial inspection.

**Movement and transfer of the drums and totes:**

- ☐ When moving drums and totes, personnel must assure that the drums and totes are safely and securely placed/located on the pallet or forklift to minimize possibility of falling or tipping.
  - ○ Secure drums to each other and/or the pallet when necessary to minimize chance of tipping.
- ☐ Personnel moving the drums or totes should verify that the drums or totes tightly closed and undamaged.

- Written procedures vs actual operations
- Readable?
- Oversight of vendors?




# Plan Review?

- We made a "SPCC Plan Facility Review and Update Checklist" for our clients. Can use for:
  - 5-year review
  - Annual review (not required… but we recommend)

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**SPCC Plan Facility Review and Update Checklist**
*(for required 5-year facility review)*

*Facility:* _____

**Instructions:** At least every five years from the Plan certification date, the responsible facility management must complete a review and evaluation of the SPCC Plan (40 CFR 112.5(b)). This review does not need to be done by the Plan certifying PE. ESCI EnviroServices recommends that this review be conducted at least annually.

This form/checklist is a guide to that review. The Plan Section numbers refer to the section numbers in Plans prepared by ESCI EnviroServices.

Facility management responsible for Plan implantation should first read the Plan to become familiar with its contents, obtain the implementation files (completed tank/container inspection checklists/ forms, training records, current CERS emergency contacts and contingency plan), and be familiar with the facility. This review checklist can then be completed, and the Plan updated as necessary.

**Administrative Review / Changes**
These changes do not require any type of PE review or re-certification.

**1) Emergency Contacts (Page i and Section 4.0 Table following Table 4-1)**
Review the list of emergency contacts (names, titles and phone numbers) on page i and/or ii [if there is a page ii] (this is identical to the Section 4 Emergency Contacts Table), and make any necessary changes. Handwritten changes are acceptable. Make the changes on the Section 4 Emergency Contacts Table as well.

- Note: these emergency contacts should be consistent with the facility's most recent Owner/Operator page submitted in CERS.

Have the listed emergency contacts changed? Yes: ____ ,make the necessary changes) No: ____

**2) Management Certification (Section 2.2 and Section 4.0 Table 4-1)**
Is the name, title and phone number of the management-level individual certifying the Plan current? If not, make necessary changes to the Table, and a new signed management certification page will be needed.

Has the certifying management changed? Yes: ____ (make the necessary change and obtain a new signature)
No: ____

**3) Person accountable/responsible for SPCC Plan implementation/administration [and oil spill prevention] (Page i, Section 4.0 Table 4-1 and Section 5.8)**
Is the name, title and phone number of the listed individual current – and is that person still responsible for Plan implementation/administration? If not, make necessary changes. Note that an individual must be listed – not simply a job or position title.

Has the listed responsible individual changed? Yes: ____ (make the necessary changes) No: ____

**Implementation Review / Changes**
These changes typically do not require any type of PE review or re-certification. However, if the actual tank/container inspection frequency or inspection checklists used are different from that described/contained in the SPCC Plan – those changes may require a review by a PE and possibly Plan re-certification, and may pose a compliance issue until the Plan is amended.

**1) Inspections, Tests & Records + Integrity Testing (Sections 5.7, 6.3 and Plan Appendix)**

- The Plan describes the periodic inspections and tests which must be done, the schedule/frequency required by the Plan and the records which must be kept. There should be sample inspection forms/instructions in the Plan appendix.

Review a representative number of completed inspections forms (for each of the facility's tanks and container areas listed in the Plan). It is suggested the review look at the last year or two of completed inspections records.

A) Are all inspections listed/described in the Plan being conducted 1) on all Plan-listed tanks and container areas, and 2) at the specified frequency?

Yes: ____ No (explain the specific differences): _____

_____

_____

*Note: The differences between actual and what is listed in the Plan are what will determine if a PE review, Plan revision and PE re-certification is needed.*

If so, look at the inspection logs(s) and see if any corrective or repair actions are necessary. If so, have these been completed?

Yes: ____ No (explain why not): _____

_____

B) Are the inspection forms contained in the Plan appendix being used?

Yes: ____ No (explain why not and what forms are being used): _____

**2) Training and Annual Spill Prevention Briefings (Section 5.8)**

- The Plan describes the initial training required for 'oil-handling' employees. These are typically those employees with responsibility for operation and oversight of any oil or fuel tanks and associated equipment, the filling or emptying of these tanks and tank inspections, and management and inspections of container areas. Annual 'spill prevention briefings' are also required for these employees.

A) Have all 'oil-handling' employees received initial SPCC training (see the listed training topic bullets under 112.7(f)(1) in the Plan – these topics are required for initial training – not just a general hazmat or environmental training)

Yes: ____ No: ____ (this is a compliance issue. Employees should receive this training within 3 months)

B) Have all 'oil-handling' employees received an annual 'spill prevention briefing' (see 112.7(f)(3) in the Plan)?

Yes: ____ No: ____ (this is a compliance issue. Employees should receive this briefing within one to two months)

C) Are training and annual briefing records being maintained for at least three years?

Yes: ____ No: ____ (this is a compliance issue.)

**3) Emergency Response Plans/Procedures (Section 5.3 – subsection for Countermeasures for Discharge Discovery, Response and Clean-up [112.7(a)(3)(iv)])**

- The Plan summarizes the facility's procedures for responding to an oil or fuel spill or release. This section is fairly generic

**1) Plan Amendment and Facility [tank/container] Information (Sections 3.3, 4.1, and 5.3 Table 5-1 [if present])**

- The Plan describes what types of changes trigger a 'technical' Plan amendment and re-certification (Section 3.3) and the Plan narratively describes the various tanks, containers/container areas, and oil-filled equipment that are captured by the SPCC Rule at the facility.

**It is critical** that the Plan reviewer read these sections carefully, become familiar with what the Plan is describing and compare that to what is actually in place at the facility. The following only applies to tanks, containers, oil-filled equipment with 55 gallons capacity or greater oil/fuel storage capacity.

A) Have there been any:

1. Additions of aboveground oil or fuel tanks, containers (e.g. more than the number of containers listed in the Plan), oil filled electrical or operating equipment other than those identified in this Plan?

   No: ____ Yes (describe/list): _____

   _____

2. Removal or closure of aboveground oil or fuel tanks, container areas, systems, oil filled electrical or operating equipment other than those identified in this Plan?

   No: ____ Yes (describe/list): _____

   _____

6. Construction or demolition that might alter secondary containment or discharge prevention/retention structures or systems (e.g. increasing or decreasing the containment area or containment wall height, installation or removal of storm drain barriers, etc.)?

   No: ____ Yes (describe/list): _____

   _____

7. Changes in products or services that impacts the likelihood of a discharge (e.g. significantly changing the oil/fuel in the tank as listed in the Plan [gasoline vs. diesel, soluble oil vs. petroleum oil, etc.], conducting refueling from a tank where that activity is not listed in the Plan, etc.)?

   No: ____ Yes (describe/list): _____

   _____

8. Significant revision of standard operating or maintenance procedures that impacts the likelihood of discharge (e.g. changing from internal maintenance or tank operations to an outside contractor)?

   No: ____ Yes (describe/list): _____

   _____

9. Have secondary containment/interstitial space (in double walled tanks) monitoring systems been installed or upgraded (e.g. installation of interstitial space leak gauges, leak monitoring systems, etc.)?

   No: ____ Yes (describe/list): _____

## Written Plan or Implementation Issues (may or may not be cited by the CUPA as a violation [most are]… but still indicates substandard Plan or compliance) *(not applicable to Tier 1 template Plans)*

- **Environmental Equivalence asserted without:**
  - Stating the reasons for each non-conformance
    - Or used for lack of secondary contain. (vs impracticability determination)
  - Describing in detail the alternative compliance measures
  - Actually implementing the alternative measures
- **Facility diagram:**
  - Missing
  - Does not include all regulated containers, OFE, loading/ unloading areas, connecting piping, USTs, portable container areas

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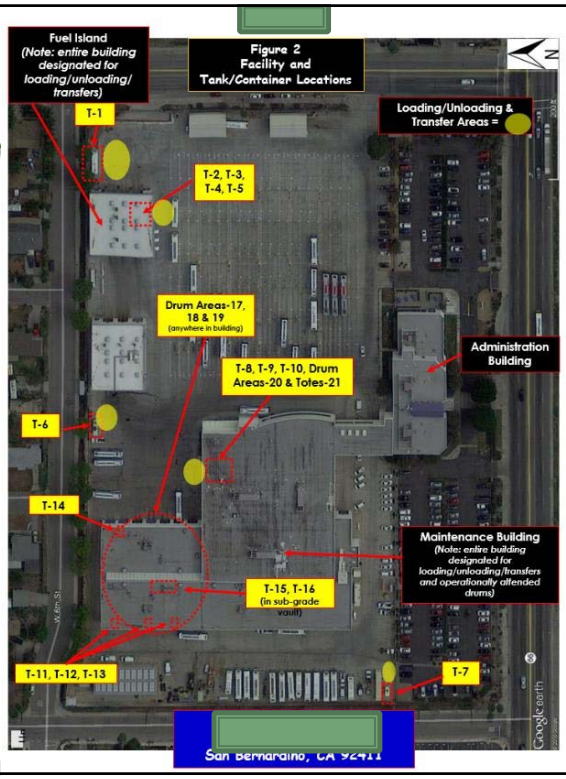
# Facility Diagram

- e.g. simple diagram
- This plan incudes tank & equipment photos showing/calling out piping
  - And notes that detailed piping plans are in facility files
    - Might not fly, though…

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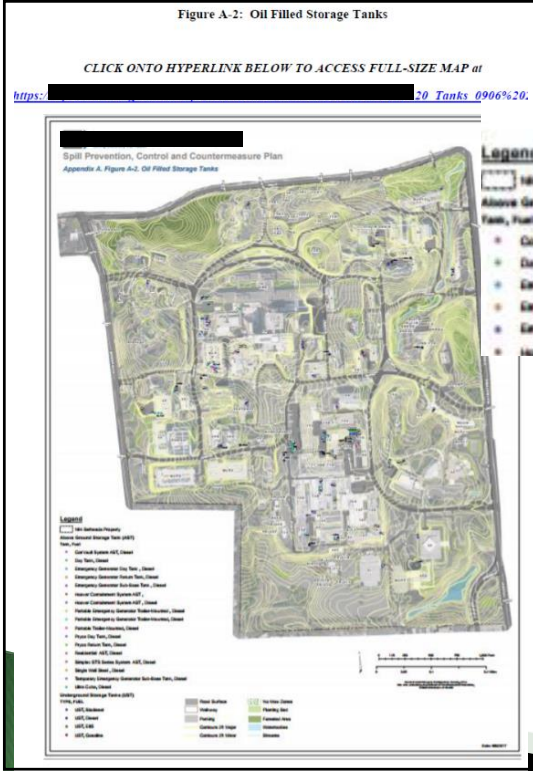


- Hard to click on the hyperlink to see a full sized pdf while out in the field
- Hard copy is just as illegible as this slide
- HUGE campus diagram… why not break it up?
- No loading/transfer areas

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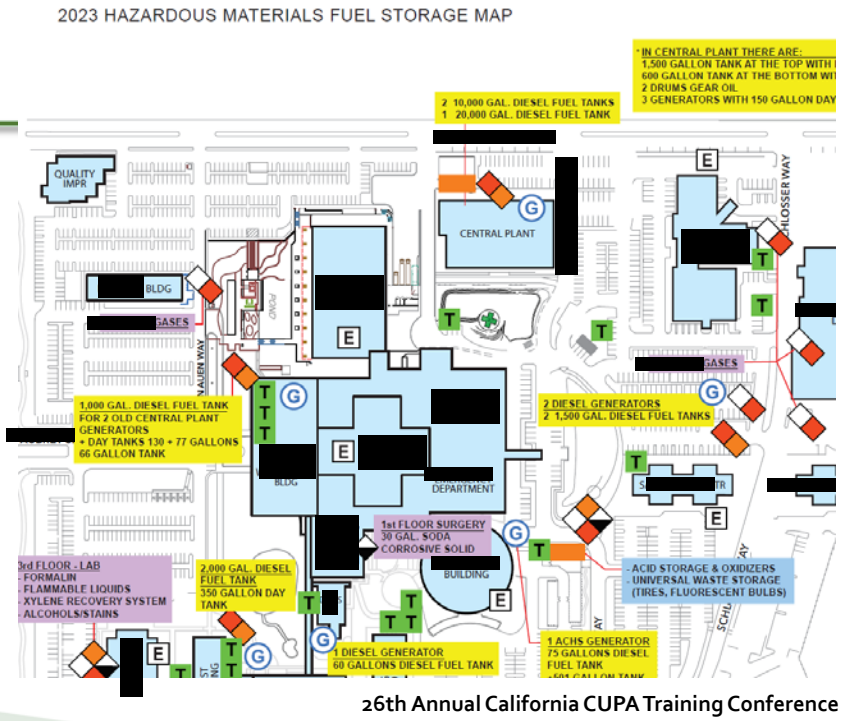
- More legible example…but
  - Why are non-oils included?
  - No loading/transfer areas
  - Does have contents and capacities

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## Written Plan or Implementation Issues (may or may not be cited by the CUPA as a violation [most are]… but still indicates substandard Plan or compliance)

- **Spill/discharge prediction**
  - Simply states 'no history of spills…'
  - Only includes 'catastrophic or complete failure' of the container as the type of failure (and not including piping or connection failures, overfills)
- **General containment or diversionary means (for attended containers, oil filled equipment, transfers/loading, piping, and all other facility areas where oil can be discharged)**
  - Not addressing or describing these areas/operations/equipment at all
  - Doesn't give any facility specifics
  - Has no relation to what's in place at the facility (e.g. spill kits, ability to respond)

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# Don't Be THESE Guys

## Rule requirement

Where experience indicates a reasonable potential for an equipment failure (such as tank overflow, rupture, or leakage), 40 CFR 112.7(b) requires that the SPCC Plan include a prediction of the direction, rate of flow, and total quantity of oil that could be discharged. Based on a review of past spill events, the potential for equipment failure that would result in a discharge of oil in quantities that are potentially harmful to the public health or welfare *or* to the environment as defined in 40 CFR 110.3 has not been established at [redacted]

**Not the right way to comply…**

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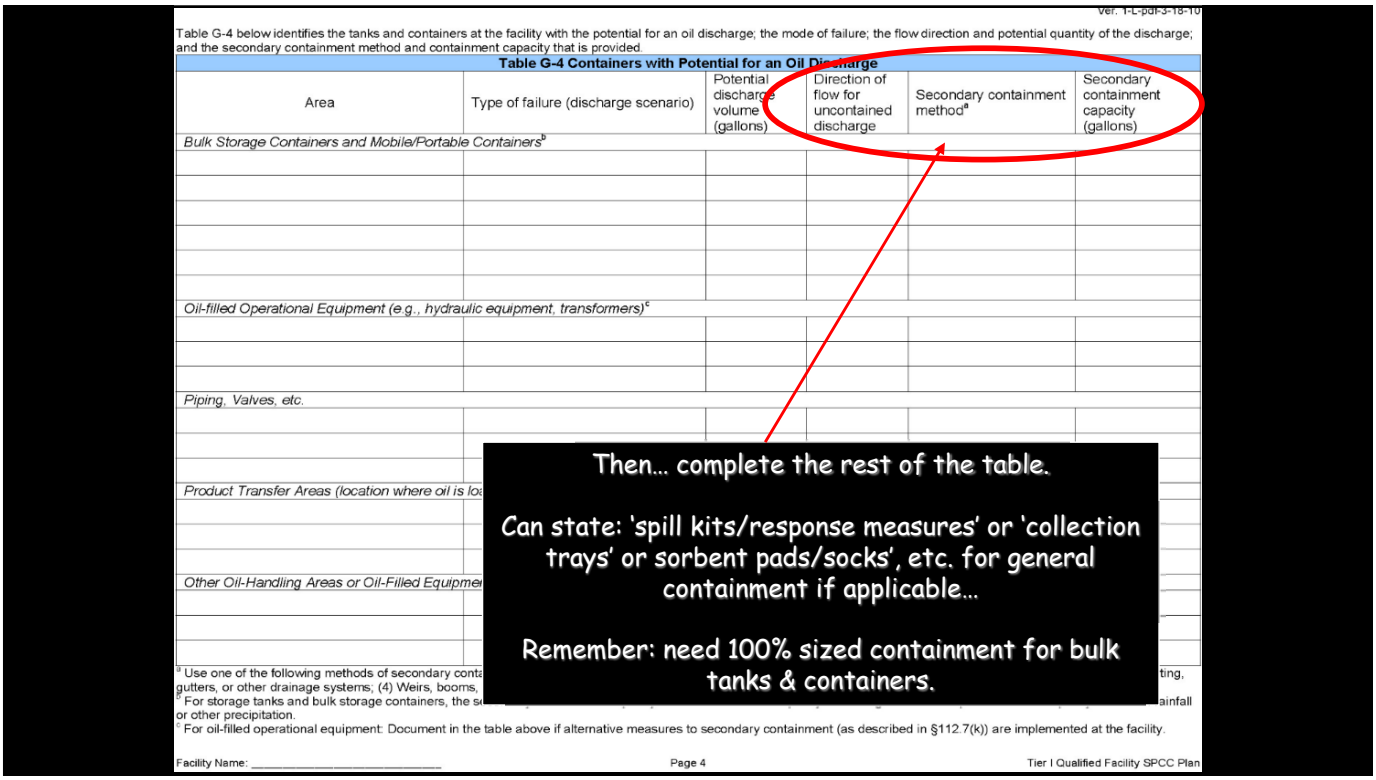
| Area | Type of failure (discharge scenario) | Potential discharge volume (gallons) | Direction of flow for uncontained discharge | Secondary containment method[a] | Secondary containment capacity (gallons) |
|---|---|---|---|---|---|
| *Bulk Storage Containers and Mobile/Portable Containers*[b] | | | | | |
| Fuel tank T-1 | Complete failure of tank | 1 – 2,000 | South | Double wall tank | > 2,000 |
| Fuel tank T-2 | Complete failure of tank | 1 – 1,500 | South | Double wall tank | > 1,500 |
| Lube tank T-3 | Complete failure of tank | 1 – 950 | Southwest | Concrete dike | 1,100 |
| Lube tank T-4 | Complete failure of tank | 1 – 800 | Southwest | Concrete dike | 950 |
| Drums in DSA-1 | Complete rupture of drum | 1 – 55 | North | Concrete dike | 1,000 |
| Drums in DSA-2 | Complete rupture of drum | 1 – 55 | North | Containment pallets | 62 each pallet |
| Drums in HW-1 | Complete rupture of drum | 1 – 55 | East | Concrete dike | 800 |
| Drums in GSDS-1 | Complete rupture of drum | 1 – 55 | Northeast | Containment pallets | 62 each pallet |
| *Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)*[c] | | | | | |
| Hydraulic presses | Hydraulic hose leak or fitting rupture | < 5 | South | Active spill response with oil sorbents | Appx. 25 |
| Machining equipment | Oil hose/fitting leak or rupture | < 5 | South | Steel spill tray | 15 |
| *Piping, Valves, etc.* | | | | | |
| | | | | | |
| *Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)* | | | | | |
| Fuel tank T-1 and T-2 loading areas | Tank overfill | 1 – 60 | South | Drain cover & spill sorbents | At least 60 |
| Fuel tank T-1 and T-2 loading areas | Tanker loading hose rupture | 1 – 60 | South | Drain cover & spill sorbents | At least 60 |
| Lube tank T-3 loading/transfer area | Tank overfill | 1 – 30 | Southwest | Drain cover & spill sorbents | At least 30 |
| Lube tank T-3 loading/transfer area | Tanker loading hose rupture | 1 – 30 | Southwest | Drain cover & spill sorbents | At least 30 |
| Lube tank T-4 loading/transfer area | Tank overfill | 1 – 30 | East | Drain cover & spill sorbents | At least 30 |
| Lube tank T-4 loading/transfer area | Tanker loading hose rupture | 1 – 30 | East | Drain cover & spill sorbents | At least 30 |
| Hazardous waste drum area HW-1 | Spill during drum filling | 1 - 5 | East | Concrete dike | 800 |
| | | | | | |
| *Other Oil-Handling Areas or Oil-Filled Equipment (e.g. flow-through process vessels at an oil production facility)* | | | | | |
| | | | | | |

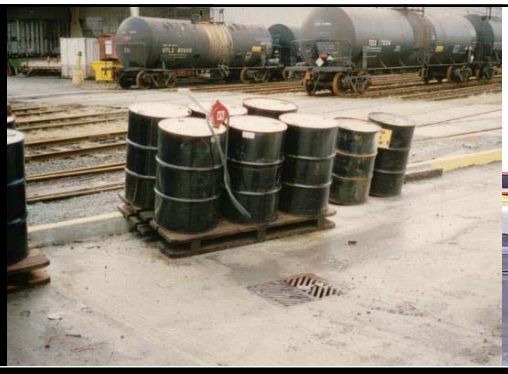
**Sample for Class**

Page 4

Tier I Qualified Facility SPCC Plan

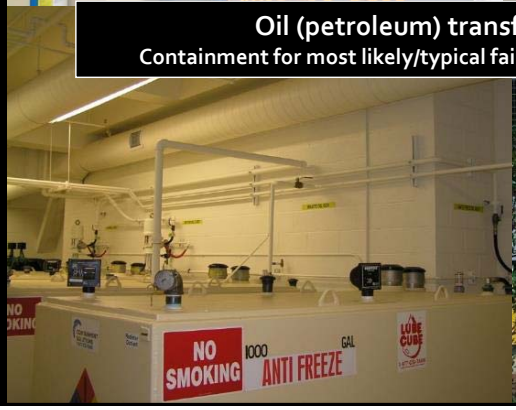



| Area/Container | Type of Failure/Discharge Scenario | Potential Discharge Volume (gallons) | Flow Rate (g/min) | Direction of Flow (uncontained discharge) | Secondary Containment Method | Secondary Containment Capacity (gallons) |
|---|---|---|---|---|---|---|
| *Bulk Storage Containers & Portable Containers (including associated piping & transfer systems, tank loading & unloading areas and handling areas)* | | | | | | |
| Used Oil Tank AST-1 | Failure of AST (collapse or puncture below liquid level) | 500 | Gradual to instantaneous | South and east across ramp area (and loading gen. containment area) to airport roadway and street and South across ramp/roadway to vegetated/grass area | Integral double wall tank<br>General loading area sloped to 500 gal. slop UST<br>Spill response supplies & response | >500 DW tank<br>~300 – 500 for slop UST<br>Up to 30 – 50 for spill supplies/response (diking to prevent spread until vendor cleanup) |
| | Tank overfill | 5 (manual pour at fill box) | 5 gal/min | | | |
| | Unloading hose or connection failure during tank unloading by waste vendor | 20 | 60 gal/min | | | |
| Mobile Refuelers staged at /near loading area/Fueling Rack | Failure of AST (collapse or puncture below liquid level) | 115 to 10,000 (depending on vehicle) | Gradual to instantaneous | South and east across ramp area (and loading gen. containment area) to airport roadway and street and South across ramp/roadway to vegetated/grass area | General loading area sloped to 500 gal. slop UST<br>Spill response supplies & response | ~300 – 500 for slop UST<br>Up to 30 – 50 for spill supplies/response (diking to prevent spread until vendor cleanup) |
| | Cargo tank overfill | 50 | <200 gal/min | | | |
| | Loading hose or connection failure during tank loading | 50 | <200 gal/min | | | |
| Mobile Refuelers staged on airport tarmac | Failure of AST (collapse or puncture below liquid level) | 2,000 to 10,000 (depending on vehicle) | Gradual to instantaneous | South and east across ramp area to airport roadway and vegetated/grass area | Oil-only sorbent booms across downslope sides of staging area<br>Spill response supplies & response | Up to 30 – 50 for spill supplies/response (diking to prevent spread until vendor cleanup) |
| | Aircraft fueling overfill | 30 | <150 gal/min | | | |
| | Loading hose or connection failure during aircraft fueling | 30 | <150 gal/min | | | |




**Oil (petroleum) handling and transfer areas**
Containment for most likely/typical failure (general containment) reqd.
Passive or active measures
?: Spill kit and facility response OK?


**Oil (petroleum) transfer areas (piping)**
Containment for most likely/typical failure (general containment) reqd.



## Written Plan or Implementation Issues (may or may not be cited by the CUPA as a violation [most are]… but still indicates substandard Plan or compliance) *(not applicable to Tier 1 template Plans)*

- **Containment Impracticability Determination made**
  - Without being properly, clearly demonstrated and described in the Plan (can't just say it's expensive)
  - Without including a 40 CFR 109 OSCP or 112.20 FRP or written commitments for manpower, etc.
    - NOT the CERS CCP

ence
2024

## Written Plan or Implementation Issues (may or may not be cited by the CUPA as a violation [most are]… but still indicates substandard Plan or compliance)

- **Inspections or checklists are present (or not)…**
  - But do not have written procedures for those inspections
  - Inspections even in the ballpark of industry standards
  - Wrong industry standard used
  - Inspection records are not kept or signed
  - Issues not being observed or noted
  - Issues not being corrected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## Written Plan or Implementation Issues (may or may not be cited by the UPA as a violation [most are]… but still indicates substandard Plan or compliance)

- **No description of integrity testing of bulk containers (distinct from 'inspections')**
  - Not addressing regularly scheduled integrity testing
  - Referencing an 'obvious' wrong industry standard (e.g. API 653 for a 1,500 gal. steel shop tank (vs STI SP001))
  - Insufficient detail when referring standards or not addressing qualifications
  - No schedule…past due date (and no baseline)

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# Integrity Testing

- Use the right industry standard


- Don't use outdated references

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**1.4 DEVIATIONS PER 40 CFR 112.7(A)(2)**

Deviations[1] include equivalent measures for providing environmental protection and procedures that were found to be impracticable to implement at the facility. For the purposes of this Plan, deviations also include portions of the facility that may or may not meet the requirements of 40 CFR §112. The facility will address these non-compliant or potentially non-compliant deviations before the time frame specified. Deviations noted following a facility site visit, key individual interviews, and document review include the following:

1. Integrity testing – EPA has indicated, that for 55-gallon drums visual inspection alone will suffice to meet the integrity testing requirements under §112.8(c)(6) or §112.12(c)(6) (67 CFR 47120) for which internal corrosion poses minimal risk of failure, which are inspected at least monthly, and for which all sides are visible.

47120 **Federal Register** / Vol. 67, No. 137 / Wednesday, July 17, 2002 / Rules and R

equipment are not bulk storage containers, the requirement is

Standards 653 and 2610 for purposes of this section, if you choose. Other usual

include a recor retention syster

For certain smaller shop-built containers in which internal corrosion poses minimal risk of failure; which are inspected at least monthly; and, for which all sides are visible (*i.e.*, the container has no contact with the ground), visual inspection alone might suffice, subject to good engineering practice. In such case the owner or operator must explain in the Plan why visual integrity testing alone is sufficient, and provide equivalent environmental protection. 40 CFR 112.7(a)(2). However, containers which are in contact with the ground must be evaluated for integrity in accordance with industry standards and good engineering practice.

Business records. You may use usual

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# As of 11-19-2020: 112.8(c)(6)

(6) Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design (such as containers that are: shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried). Examples of these integrity tests include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices satisfy the recordkeeping requirements of this paragraph.



# From STI SP-001 (7th Ed.)

**TABLE 5.5 TABLE OF INSPECTION SCHEDULES**

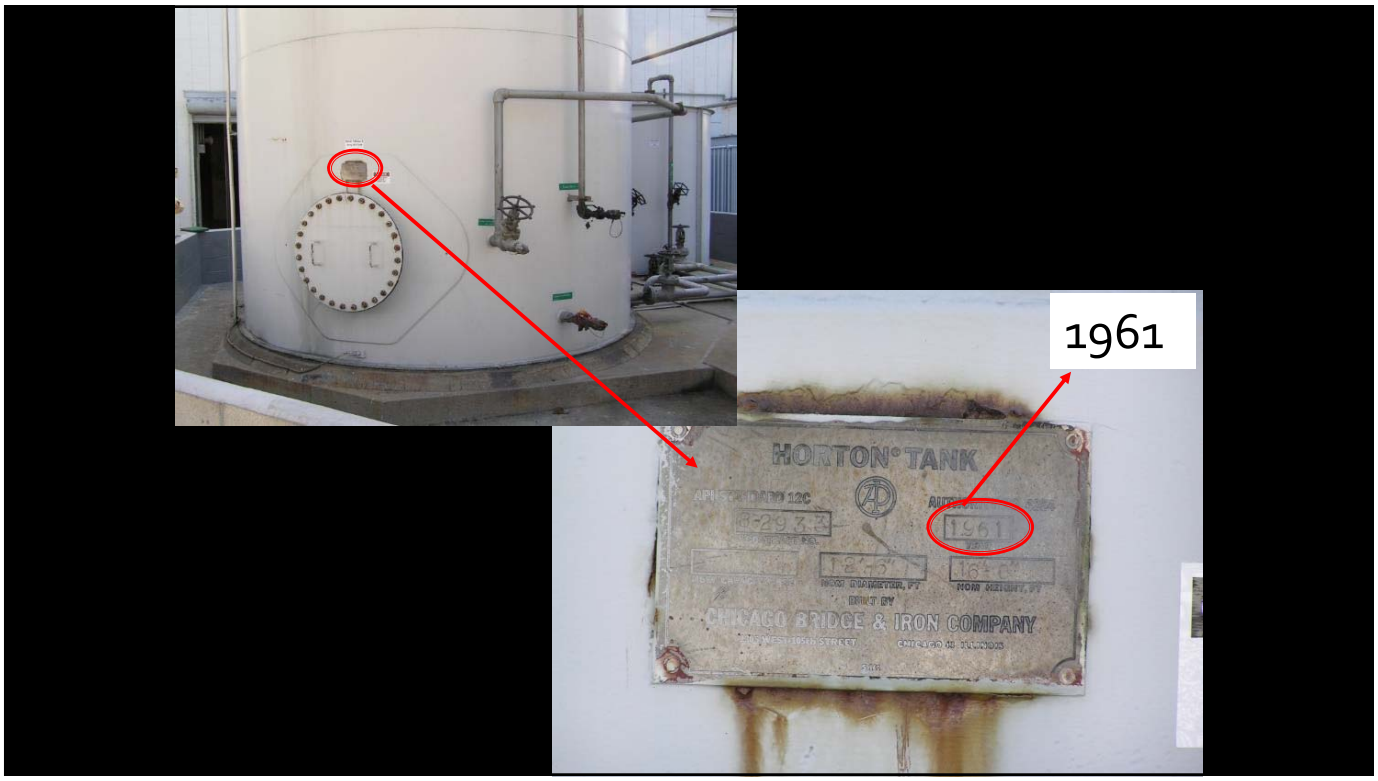
| AST Type and Capacity in U.S. gallons (liters) | | Category 1 | Category 2 | Category 3 |
|---|---|---|---|---|
| Shop-Fabricated Welded Steel ASTs | 0 – 1100 (0-4164 liters) | P | P | P, E&L(10) |
| | 1101 - 5,000 (4168-18,927 liters) | P | P, E&L(10) | [P, E&L(5), I(10)] or [P, L(2), E(5)] |
| | 5,001 - 30,000 (18,931-113,562 liters) | P, E(20) | [P, E(10), I(20)] or [P, E(5), L(10)] | [P, E&L(5), I(10)] or [P, L(1), E(5)] |
| | 30,001 - 75,000 (113,566-283,906 liters) | P, E(20) | P, E&L(5), I(15) | P, E&L(5), I(10) |
| Portable Containers* | | P | P | P** |

* Portable containers can be constructed of metallic (steel, stainless steel) or non-metallic (plastic) materials and should be constructed to a recognized standard for the purpose they are being used.

** In addition to periodic Portable Container Monthly Inspections described in Appendix C, Owners shall either discontinue use of portable container for storage or have the portable container DOT (Department of Transportation) tested and recertified per the following schedule (refer to Section 9.2):

- Plastic portable container – every 7 years
- Steel portable container – every 12 years
- Stainless Steel portable container – every 17 years

- Steel or plastic drums
  - In proper containment = Cat. 1
  - Periodic inspection
    - Meaning a monthly inspection by the owner's inspector.





>> For Mobile Refuelers OMR-1 & -2, GMR-1 & FMR-1: Minimum weekly to monthly (may use the Air Transport Association (ATA) Specification 103 "Standard for Jet Fuel Quality Control at Airports", as the associated inspection procedures and forms. the specific cargo tank certifications/inspections specified in 49 CFR 180.407 et seq. are required (appx. every 2 - 3 years), and serve as the relevant industry standard for integrity testing these mobile tanks.

# Is the Plan Current/Accurate in re Implementation?

- Inspection form specified in the Plan and reviewed during initial Plan training

**Monthly Aboveground Oil Tank & Oil Drum Inspection Checklist** (rev 2-2019)
*(Lube & Compressor Room 109, Parts Room Drum Storage, Drum Storage/Staging In Maintenance Bays)*

| Inspection Date → / Inspector Name → / Area | July | | | August | | | September | | | October | | | November | | | December | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | OK | No* | Correction Date | OK | No* | Correction Date | OK | No* | Correction Date | OK | No* | Correction Date | OK | No* | Correction Date | OK | No* | Correction Date |
| Motor Oil 3 Tank T-1 (280 gal.) | | | | | | | | | | | | | | | | | | |
| ATF Tank T-2 (1,000 gal.) | | | | | | | | | | | | | | | | | | |
| Gear Oil Tank T-3 (280 gal.) | | | | | | | | | | | | | | | | | | |
| CNG/LNG Motor Oil Tank T-4 (1,000 gal.) | | | | | | | | | | | | | | | | | | |
| Motor (Diesel) Oil Tank T-5 (1,000 gal.) | | | | | | | | | | | | | | | | | | |
| Parts Room Drum Storage Area (DSA-PR) | | | | | | | | | | | | | | | | | | |
| Parts Maintenance Bay Drum Storage/Staging (DSA-MB) | | | | | | | | | | | | | | | | | | |

**Inspection Procedure: (Check / Inspect for)**

1. Tanks, fittings, nozzles and valves free of signs of leakage (if tank surfaces or containment is oily, cleaning may be required prior to reinspection)
2. Tank shell (visible sides and top), tank mounts/supports, fittings and closures, and valves free of signs of corrosion, blistered or peeling paint, damage, distortion or deterioration. No oil residues on tank exterior
3. Tank mounts undamaged, bolted to floor, free of rust or distortion. Is tank grounding cable present, connected and undamaged?
4. Tank level gauges and high-level alarm operating properly (observe and test alarm horn) and leak free
5. Emergency vents undamaged, not obstructed, free of debris and rust
6. Secondary containment pallets and other containment sumps/areas free of liquid accumulation or oil staining; containment floor, curbing/sides curbing free of cracking or damage
7. Bulk tank interstitial containment space (space between the tank's double walls) free of liquid. Carefully look at the glass 'LeakGuard' containment leak indicator on top of tank (near the back) …it should not show any of the orange plastic indicator in the glass 'jar'. Any showing of the orange indicator is a sign that the primary tank has leaked into the containment space. This requires the tank monitor port to be opened and physically checked for liquids.
8. Oil piping, hoses/piping and piping mounts/supports free of signs of leaks, damage, settling/distortion, corrosion, peeling paint
9. Drums free of dents, deep scrapes, distortion, rusting or other damage
10. No evidence of tank or drum overfills
11. Loading area outside Room 109 (where oil vendor parks to unload into the tanks) and drum drop off areas clean and free of signs of leaks or spills
12. Spill response supplies well stocked and immediately available

*Comments/Corrective action needed:

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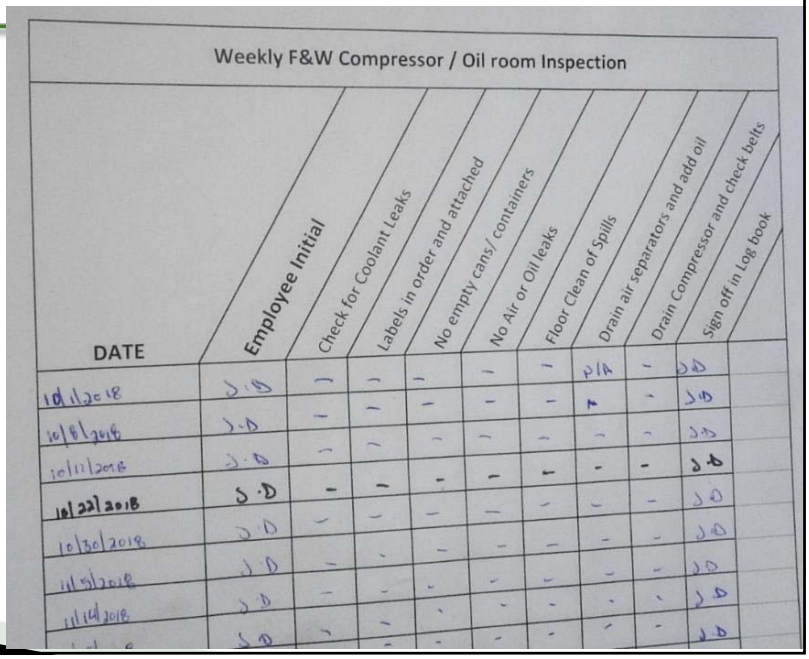
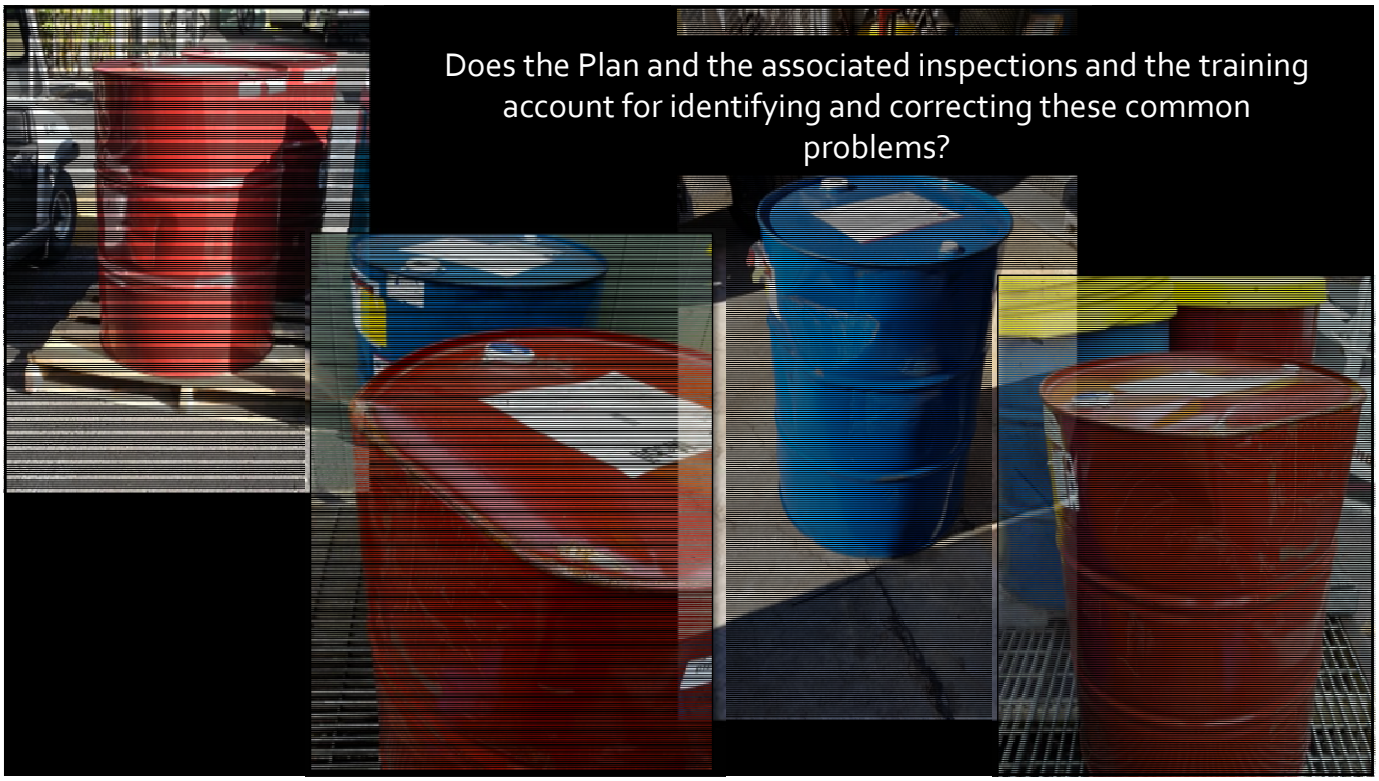
# vs What They Actually Were Using

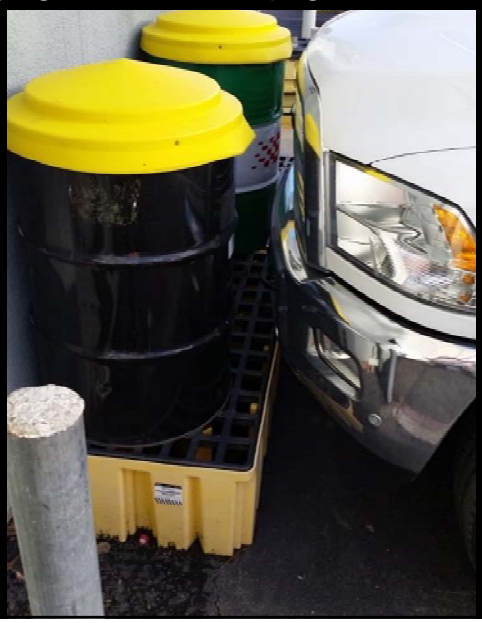
- Part of the Plan writing process needs to be talking to the folks who will be *doing* the inspections, etc.
  - Woulda been nice if the Plan writer knew the maintenance folks thought they were locked into this form






Plan stated all drums are maintained in full capacity secondary containment and are protected from storm water…but a good field verification before Plan is finalized would reveal:

1. Only the drum *tops* are weather-protected… not the containment &
2. Parking big fat work trucks up against the drums is common.



INSPECTION REPORT

Equipment | Inspection Results: Time | Results

ground (test UST alarm)

Satellite HAZ WASTE accumulation site

Oil - Water Separator

Lube Oil Tanks, Bowsers, Reservoirs

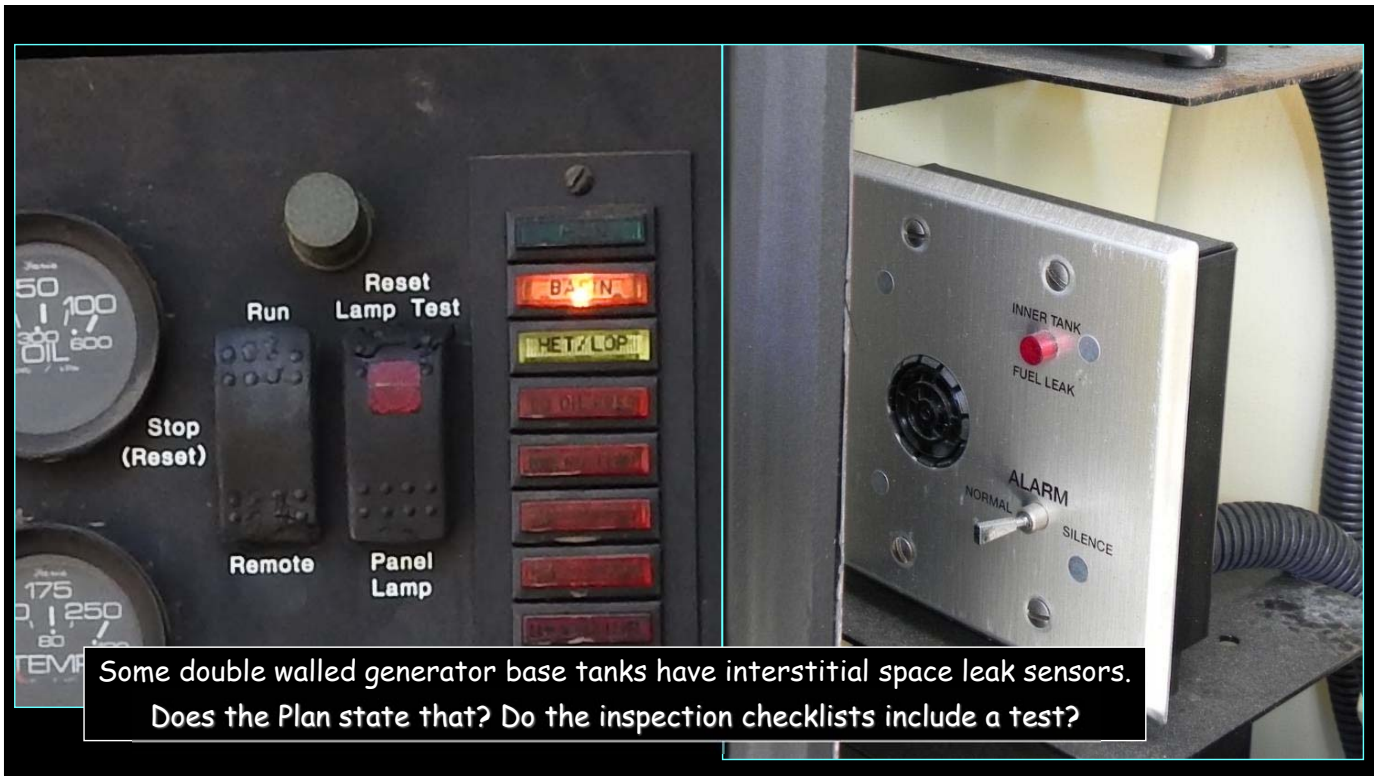
Oily Waste Sump

NAME OF INSPECTOR: DATE:

Provide comments for "ABNORMAL" conditions:

This inspection form does NOT incorporate the written inspection procedure.

Therefore, the Plan must contain, describe or reference (to an actual written procedure), etc. the written inspection procedure or the facility could be non-compliant with HSC 25270.4.5(a) [ref. 40 CFR 112.7(e) & 112.8(c)(6)]




Some double walled generator base tanks have interstitial space leak sensors. Does the Plan state that? Do the inspection checklists include a test?


Some double walled generator base tanks have interstitial space leak sensors… and some of those are not connected ☹

Verification should be part of the Plan writing process (so it can be fixed before certification)

Don't be afraid of adding some guidance or instructions to ensure a more thorough inspection

**Monthly Fuel and Oil Product Tank/Container Inspection Checklist and Procedure**

Name:_____ Signature:_____

Title:_____ Date:_____

| *Inspection Procedure and Criteria* | *Gasoline Tanks T-1 & T-2* | | *ATF Tank T-3* | | *Lube/Motor Oil Tank T-4* | | *Lube/Motor Oil Tank T-5* | | *Diesel Generator Fuel Tank T-6* | | *Oil Drums or Totes* | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | OK | No* | OK | No* | OK | No* | OK | No* | OK | No* | OK | No* |
| Tank surfaces, fittings, piping, hoses and valves free of signs of oil or diesel leakage?<br>• If tank surfaces or containments are oily or stained, cleaning and tightening/repairing will be required prior to reinspection | | | | | | | | | | | | |
| Outer tank or container shell (visible surfaces – including top), tank mounts/supports/base, fittings & closures, piping and valves free of signs of corrosion, blistered paint, damage, distortion or deterioration?<br>• Any such damage or deterioration must be evaluated by facility management to determine course of action. | | | | | | | | | | | | |
| Drum or tote secondary containment (inside containment pallet or area) free of liquid and sorbents; containment floor, pallet free of cracking or damage? | | | | | | | | | | | | |
| Fill ports or fill boxes undamaged, clean and free of accumulated liquids; fill box lids & or tank caps on securely; ground area around fill ports/boxes free of oily residues?<br>• If these areas are oily or stained, or have accumulated liquids, liquid removal and cleaning will be required prior to reinspection | | | | | | | | | | | | |
| Tank level gauges, high level alarm or depth gauge/sticks leak free and operable? | | | | | | | | | | | | |
| Bulk tank annular containment space (space between the gasoline, oil and diesel tank double walls) free of liquid? If so: corrective action must be taken.<br>1. Observe the leak gauge on top of T-3 & T-5. If indicator glass shows any color:<br>2. Pull out the steel containment indicator rod from the top front of tank T-4. If rod indicates any liquid at bottom:<br>3. Observe the sight plug in the generator diesel tank front edge. If any liquid is showing in this clear plug:<br>4. On the gasoline tank Veeder-Root panel in the office, press the 'Function' button until display shows 'Liquid Status', then press 'Print' button. If printout shows 'Fuel Alarm' or 'Sensor Out':<br>• These indications indicates presence of liquid in the containment space and is a sign that the primary tank has leaked into the containment space (or the leak sensor is not functioning) | | | | | | | | | | | |
| Gasoline or oil truck unloading area adjacent to the fuel tanks, and oil room clean and free of signs of leaks or spills? | | | OK: ____ | | No*: ____ | | | | | | | |
| Gasoline fuel piping, dispensers, nozzles, hoses and hose & piping mounts/supports free of signs of leaks, damage, settling/distortion, corrosion, peeling paint? | | | | | | | | | | | | |
| Oil tank hoses and piping, dispensing pumps and hose / piping mounts/supports free of signs of leaks, damage, settling/distortion, corrosion, peeling paint? | | | | | | | | | | | | |
| Emergency / spill response supplies well stocked and immediately available near the fuel tanks and oil tank room? | | | OK: ____ | | No*: ____ | | | | | | | |

*Comments/Corrective action needed (indicate date corrected):

_____

_____

*Inspection Procedure: At least monthly, carefully inspect each designated area for the indicated conditions. Explain any conditions marked 'No' and indicate corrective action needed (and estimated completion date). Completed, signed forms must be kept on file for minimum 3 years.*

**MONTHLY TANK INSPECTION CHECKLIST: *Riverside Coun***
***- AST #T-1 (12,000-gal. Gasoline)***

(developed by certifying P.E. to be equivalent to STI SP-001 checklist)

**INSTRUCTIONS: See Inspection Guidance on reverse.** On this side, *fill in ALL applicable data.* A copy or electronic scan of this completed form shall be kept in Water Department or Fleet Services Department files, and made available for inspection by the Long Beach Fire Dept./CUPA upon request.

| TANK INFORMATION | | | |
|---|---|---|---|
| Palm Desert Sheriff Station – Fueling facility, 73705 Gerald Ford Drive, Palm Desert, CA 92211 (operated by Riverside County Fleet Services) | | | |
| TANK # AST #1 | TYPE: UL-2085 Steel | PRODUCT STORED: Unleaded Gasoline | TANK CAPACITY: 12,000 gallons |

| | Item | Status | | Item | Status |
|---|---|---|---|---|---|
| 1.0 | Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? | ❒ Yes ❒ No* | 14.0 | Is the containment/interstitial monitoring equipment in good working condition, and is the secondary containment free of any liquid?<br>• On the tank Veeder-Root panel inside the adjacent building: Press the 'Function' button until display shows *'Liquid Status'*; then press 'Print' button. If printout shows *'Fuel Alarm'* or *'Sensor Out'*: *This indicates a) presence of liquid in the containment space and b) a sign that the primary tank has leaked into the containment space, or b) water is present, or c) if 'Sensor Out', the leak sensor is not functioning.* | ❒ Yes ❒ No* |
| 2.0 | Open the tank fill box on the northwest side of the tank and inspect for accumulations of diesel. Is the fill box should be clean and dry. | ❒ Yes ❒ No* | | | |
| 3.0 | Is the tank exterior, and all exposed piping free of damage, distortion, corrosion? | ❒ Yes ❒ No* | | | |
| 4.0 | Are piping connections to the tank (including valves, fittings, pumps, etc.) free of visible leaks? Note: If "No", identify location and describe leak. | ❒ Yes ❒ No* | | | |
| 5.0 | Is the tank exterior free of visible signs of coating failures/degradation? | ❒ Yes ❒ No* | 15.0 | Is the primary tank free of water?<br>Press the 'Print' button. Look at the printout, the printout will show inches of water at the bottom of the tank. If any reading other than 'Water = 0.00 inches', check the No box. If a water check has not been conducted this month – check that box. | ❒ Yes ❒ No*<br>❒ Water check not conducted |
| 6.0 | Are the tank mounts, brackets, mounting bolts, supports and concrete base/foundation free of damage, cracking, corrosion and in good condition? | ❒ Yes ❒ No* | | | |
| 7.0 | Is the area around the tank and around loading and dispenser areas (concrete and asphalt surfaces, containment dike, etc.) free of visible signs of leakage? Has any used absorbent been cleaned up? | ❒ Yes ❒ No* | 16.0 | The Veeder Root control panel display should show a green power light and no amber warning or red alarm light. The display should read "All Functions Normal"<br>• Press the RED 'Alarm _ Test' button. The yellow and red lights should light. | ❒ Yes ❒ No* |
| 8.0 | Are all tank labels and signs intact and readable (NFPA, hazard wording, warnings, emergency instructions and contact numbers etc.)? | ❒ Yes ❒ No* | | Are spill supplies (absorbent, PPE, etc.) nearby, labeled and properly stocked? | ❒ Yes ❒ No* |
| 9.0 | Are all hoses and dispensers, and all break-away connections in good condition, undamaged and leak-free? Are nozzles up off the ground? | ❒ Yes ❒ No* | 18.0 | Look closely at the two black, round emergency vents on top of the tank. Are they unobstructed and free of debris (such as bird nests, etc.)? | ❒ Yes ❒ No* |
| 10.0 | Look at visible high level and interstitial leak detection sensor wiring and connections on top of tank: Are they in good condition & intact? | ❒ Yes ❒ No* | 19.0 | Is there a fire extinguisher in the immediate area, and is the inspection tag current (monthly check?) | ❒ Yes ❒ No* |
| 11.0 | All visible tank openings properly sealed? Caps and covers have functional fittings, hardware and gaskets? | ❒ Yes ❒ No* | 20.0 | Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan? | ❒ Yes ❒ No* |
| 12.0 | Are concrete dike drain valve(s) closed and in good working condition? | ❒ Yes ❒ No* | | | |
| 13.0 | Check the overfill/high level alarm light and horn (panel on the canopy support). Press the **Test** button on the right side of the 'Acknowledged' box. Does it activate the audible horn and light to confirm operation? | ❒ Yes ❒ No* | | | |

**SEE BELOW FOR ANY (No *) STATUS**
**SEE REVERSE FOR INSPECTION GUIDANCE**

**Condition or Status Notes/Comments:**

| Item # | |
|---|---|
| | |
| | |
| | |
| | |

Inspector Name & Signature: _____ Date of Inspection: _____

**Inspection Guidance/Results:**

- Inspectors shall be knowledgeable of the purpose of each piece of equipment, method of operation, characteristics of liquids stored, and if applicable, the manufacturers maintenance, inspection, testing requirements, and instructions.
- This 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 designated inspector who is familiar with the site and can identify changes and developing problems.
- For equipment not included in the STI SP001 standard, follow the inspection, maintenance, and testing schedules and procedures as recommended by the manufacturer.
- Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container; remove promptly or take other corrective action. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and dispose of it properly.
- **(*) designates an item in a non-conformance status. This indicates that action is required to address a problem. Document corrective actions in the comment section on the front side of this form.**
- Non-conforming items important to tank or containment integrity (cracks, tank or containment deformation, etc.) 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 36 months. The completed inspection form may be kept in hard copy in facility files, or may be scanned or otherwise kept electronically.

In the event of maintenance (such as painting) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required immediately following the event.

# Sample Inspection Procedures in the Plan

- Also summarized on the tank-specific inspection checklist
  - Vs "Any leaks? Yes or No"

Personnel also check for leaks into secondary containment:

- Monitored containment: via sensor reading of leak monitors or indicators monitoring the interstitial space of double walled tanks for indication of spills or leakage into the interstice.
  - **AST #1** is monitored via the Veeder Root system and the control/monitor panel is located on the west exterior wall of Building E wall directly across from AST #1. For the monthly inspection, the panel weather box should be opened and:

- The control panel display should show a green power light and no amber warning or red alarm light.
  - **Press the RED 'Alarm _ Test' button. The yellow and red lights should light.**
- The presence of water in the tank should be checked. Water (which, if present, would be at the bottom of the tank) will eventually result in internal corrosion and possibly leaks.
  - **Press the Print button. This will print out an inventory report. The printout will show the inches of water in the tank:**

```
VOLUME   =  8771 GALS
HEIGHT   = 54.38 INCHES
WATER    =  0.00 INCHES
TEMP     = 87.1 DEG F
```

  Any water should be removed on a minimum quarterly to semi-annual basis.
- The secondary containment/interstice leak sensor should be queried as followed:
  - **Press the Function button several times slowly until the display reads "Liquid Status".**
  - **Press the Step button. The display should read "Sensor Normal". If a record is needed, press the Print button.**
    - If the display reads "Liquid" or "Sensor Out" – there is either a liquid (diesel) in the containment or there is a problem with the sensor. Either requires immediate action.
- The leak status of the below ground double walled supply and return piping should also be queried via the Veeder Root panel (line leak test function).

# Sample Inspection Procedures in the Plan

- **AST #2** is monitored by an electronic monitoring system; the alarm/status panel is located on top of the tank. The panel can be directly viewed; the following lights indicate proper condition:
  - The green Power Available light should be on
  - The green Normal Operating Range light should be on.
  - A red Tank Leak (indicating a leak into the containment interstice) or a red High Level alarm requires an immediate response.
- **Lab/Ops Bldg. Emergency Generator** is monitored by an electronic monitoring system; the alarm/status panel is located on the control panel inside the generator enclosure. The panel can be directly viewed.
  - The Lamp Test rocker button should be depressed, and all of the adjacent warning lights should illuminate (pay particular attention to the "Basin" light and verify it lights up when the test button is pressed).
    - **Once the lamp test is completed, if the "Basin" light is still illuminated, that indicated a leak into the secondary containment and an immediate response is required.**
    - **If the "Basin" lamp does not illuminate upon test, either the lamp is out or there is a problem with the leak sensor. Either condition must be immediately addressed.**
  - Non-monitored containment:
    - **Open portable rising wall berms:** Visual inspection around each contained piece of equipment, looking for leaks, and overall for condition (damage, deterioration), proper placement of equipment within, and all rising berm walls are clear/unobstructed and able to rise with any liquids. Verify that any drainage ports, plugs or caps are tightly closed.
    - **The 233-gallon Hi Power Portable Generator** spill containment basin: Visual inspection of the open spill containment basin integral to the fuel tank inside the generator enclosure.
      - The generator enclosure doors should all be opened, and using a flashlight the interior carefully examined, looking for indications of liquid (fuel) in the open basin surrounding the fuel tank).
    - **Drum Storage Areas (DRDA 1 in Building H and Building F Drum Storage Area)**: Visual inspection of the storage area containment floors (and for Building F the piping trench) looking for leaks, and overall for condition (oil staining, damage, deterioration).

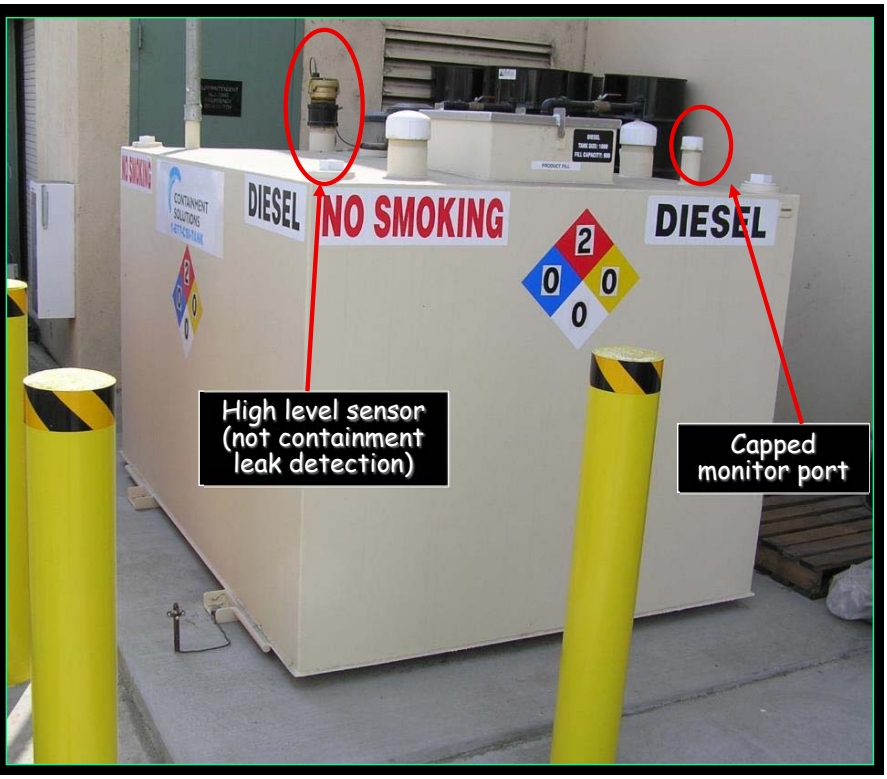
During the inspection, overfill protection or prevention devices (as applicable) are checked for proper operation and damage; overfill alarm test functions (test buttons, etc.) must be used were present to verify proper operation of the visual and/or audible alarm (e.g. the push-to-test button *on the right side* of the small AST #1 high level alarm acknowledgement box mounted immediately to the left of the Veeder Root control panel. Visible exterior surfaces of hoses, piping and fittings as well as all drains and outlets are checked for leakage or signs of potential failure, and any evidence of overfills or spills is checked. Fueling and dispensing hoses and nozzles are checked for condition.

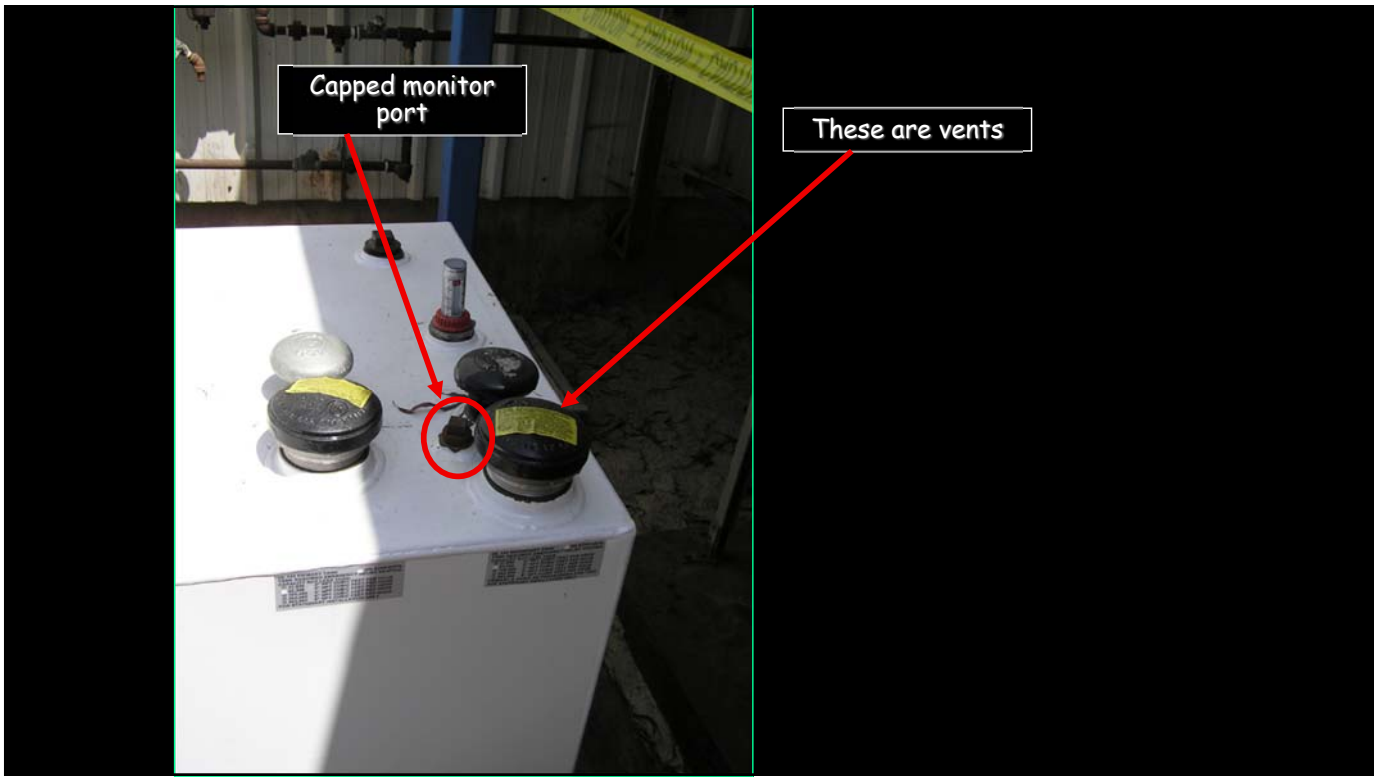
A more detailed inspection, consistent with the Steel Tank Institute SP-001 standard is conducted annually of ASTs #1 and #2.

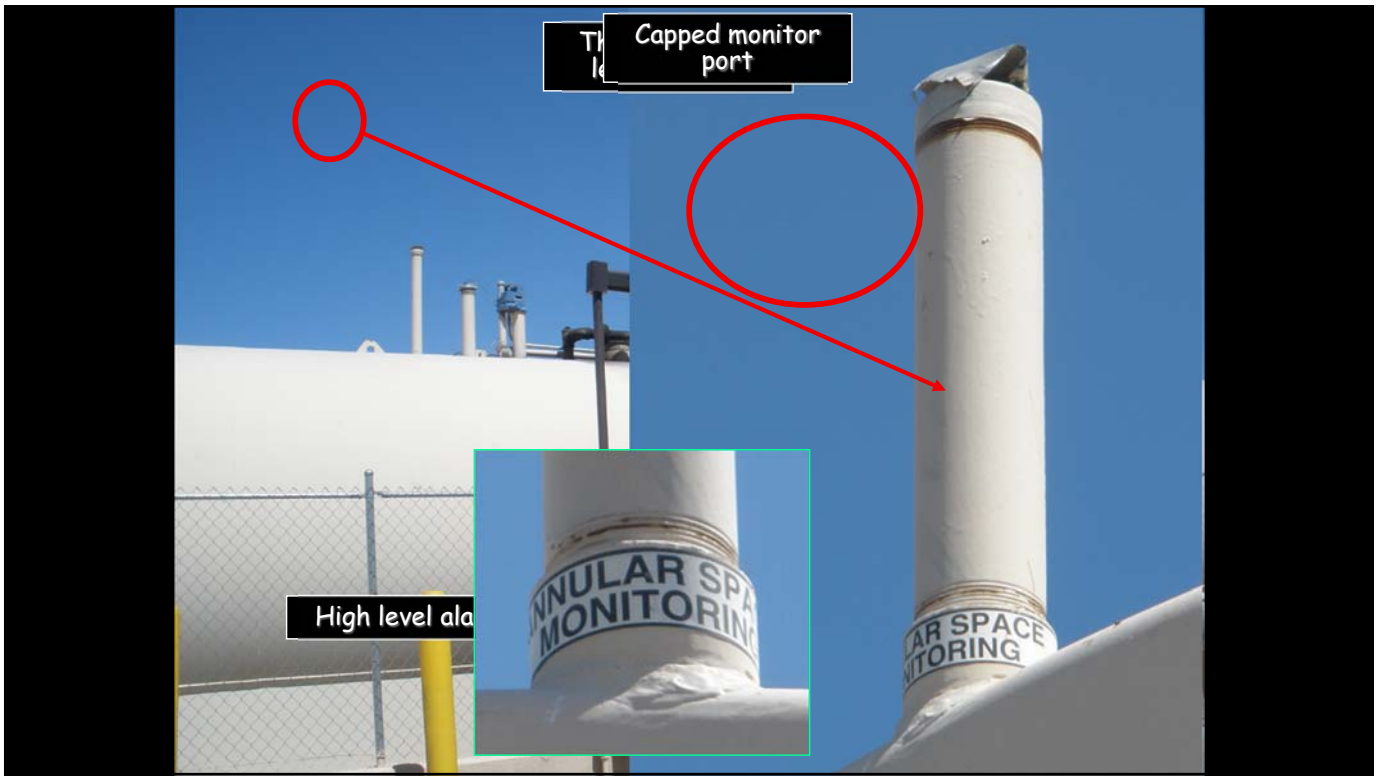
Easy to just write: Double walled tanks, etc.

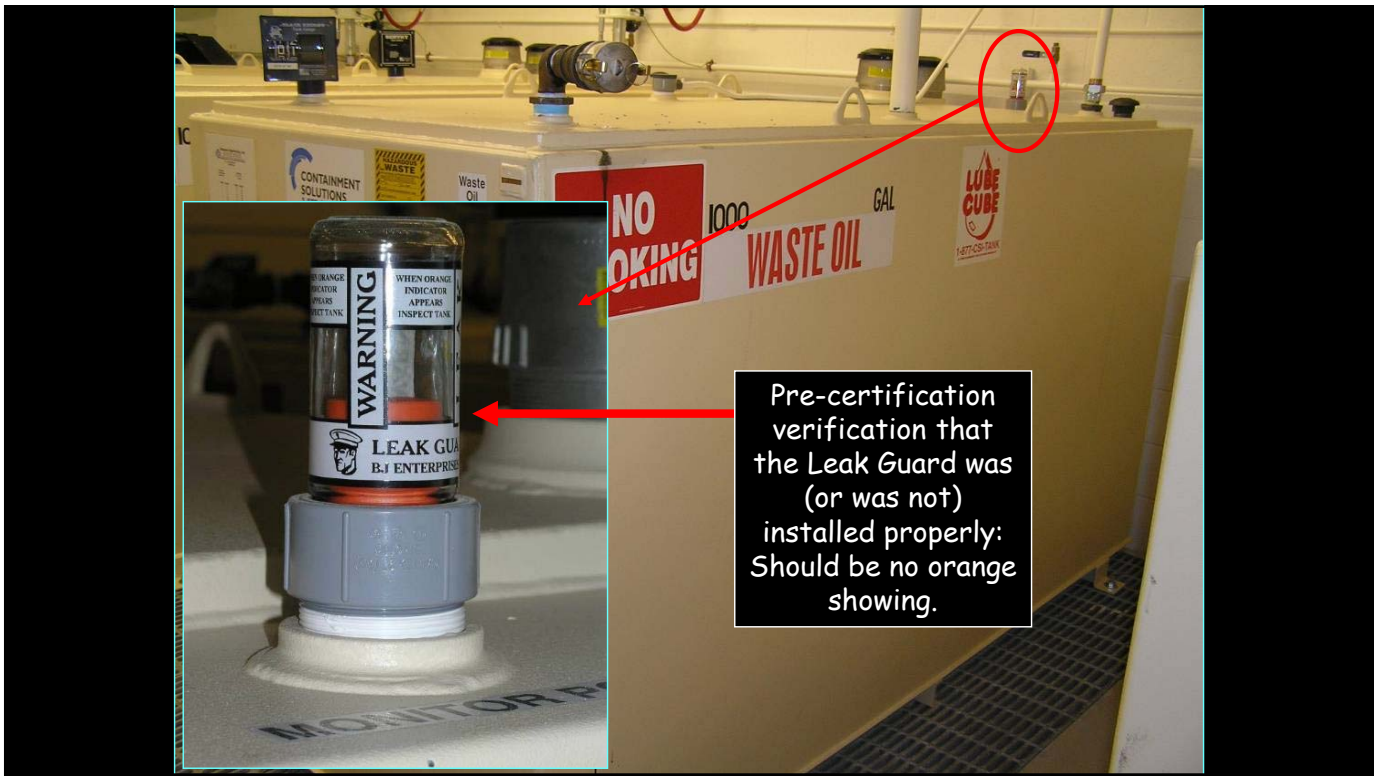
But write in the Plan *how* secondary containment (or the interstice) will be inspected.

If you do a good field evaluation, you'd realize this tank has no real means of inspecting the interstoce…and you can have that addressed before plan certification.







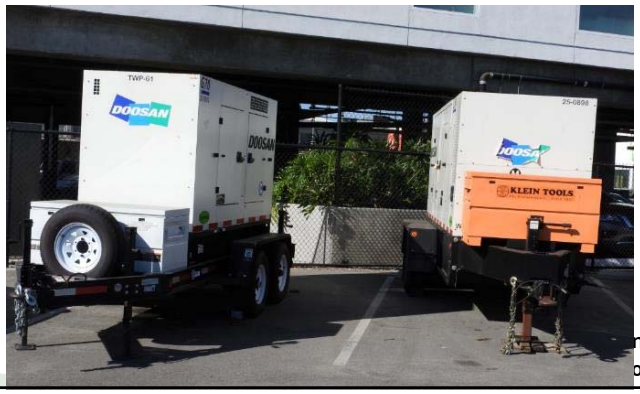

| Tank ID and Description | General Location | Oil Storage Capacity (gals) | Contents | Containment or Discharge/Drainage Control Type; Overfill Protection | Notes |
|---|---|---|---|---|---|
| **RO-T 5** Recyclable Oil Tank<br>Polypropylene, single wall | Oil Recycling & Storage Area (south east portion) | 1,900 | Used recyclable machining / cutting oils | • **Containment Type:** Sized (40 CFR 112.8(c)(2)).<br>• **Containment Description:** Concrete curbing 10'10"x27'5"x16.5" (3,000 gal. capacity). Covered.<br>• **Overfill Protection:** Visual verification and communication ('fast response system') during filling activities. (40 CFR 112.8(c)(8)) | |
| **UO-T 2** Used Oil Tank<br>Fiberglass-reinforced polypropylene, single wall | Oil Recycling & Storage Area (north west portion) | 935 | Used lubricating/ machining oil | • **Containment Type:** Sized (40 CFR 112.8(c)(2)).<br>• **Containment Description:** Concrete curbing 9'8"x11'2"x24" (1,615 gal. capacity). Covered.<br>• **Overfill Protection:** Visual verification and communication ('fast response system') during filling activities. (40 CFR 112.8(c)(8)) | |
| **OCTS -1** Oil Containing Liquid Tote Storage<br>IBC/tote | Oil Recycling & Storage Area (northern portion) | 330 max. ea (appx. 660 max total (2 totes)) | Oil containing liquids (soaps, waste water) | • **Containment Type:** Sized (40 CFR 112.8(c)(11)).<br>• **Containment Description:** Concrete curbing 6'9"x10'10"x22" (1,002 gal. capacity).<br>• **Overfill Protection:** Visual verification gauge and communication during filling activities. (40 CFR 112.8(c)(8)) | |
| **CODS-2** Machine, Lube and Cutting Oil Storage and Dispensing Areas<br>55 gallon steel drums | Oil Recycling & Storage Area (northern portion) | 55 ea. (appx. max. total 550 (10) drums) | Machine lubricating and cutting oils | • **Containment Type:** Sized (40 CFR 112.8(c)(11).<br>• **Containment Description:** >800 gal containment in overall area and storm water sump system. Covered.<br>• **Overfill Protection:** Visual verification if drums to be filled. (40 CFR 112.8(c)(8)) | Area not currently used. Identified in the Plan for operational flexibility. |
| **CODS-1** Machine, Lube and Cutting Oil Storage | Oil Recycling & Storage Area (northeast portion) | 55 ea. (appx. max. total 1,100 max. (20 | Machine, lubricating and cutting oils | • **Containment Type:** Sized (40 CFR 112.8(c)(11).<br>• **Containment Description:** Concrete curbing | |



You ARE actually measuring, calculating or verifying, right?

# Portable Diesel Generators or Pumps, etc.

- Are they listed in the Plan?
- Containment?
- How long are they on-site?
  - For initial Plan: any time period
  - Existing Plan: < or > 6 months?
  - Is that being tracked or documented?




# Options (include flexibility to avoid technical amendment entanglements [portable containers – not fixed tanks])

- Plan #1:
  - Four 55-gal. drums of Mobile 10-50 oil
  - One 55-gal. drum of Mobile DTE
  - Three 55-gal. drums of LE hydraulic oil 564A
- Plan #2:
  - An average of ten and a maximum of fifteen 55-gal. drums of various lubricating, gear, machine and hydraulic oils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## Written Plan or Implementation Issues (may or may not be cited by the CUPA as a violation [most are]… but still indicates substandard Plan or compliance)

- **Overfill prevention not addressed or described**
- **Inspections of piping valves & appurtenances not addressed**
- **Outdated PE certification attestation language**
- **'Conditional' PE certifications**
- **Certifying Plans at facilities using old USTs as ASTs**
- **ONLY including petroleum and/or APSA tanks**
  - vs ALL oils and APSA-exempt, 40 FR 112 non-exempt stuff



## Written Plan Issues in Cruddy Plans

(not always citable as a violation… but still indicates a substandard Plan)

- **Omitting non-transportation mobile containers or using them for storage**
  - Assuming they are transportation-related only
- **For Qualified Facility plans:**
  - Using environmental equivalence provisions or containment impracticability without PE certification
  - Certifying management never having visited the facility



Mobile containers used for storage

**A. Onshore Facilities (excluding production) (§§112.8(b) through (d), 112.12(b) through (d)):**

The owner or operator must meet the general rule requirements as well as requirements under this section. Note that not all provisions may be applicable to all owners/operators. For example, a facility may not maintain completely buried metallic storage tanks installed after January 10, 1974, and thus would not have to abide by requirements in §§112.8(c)(4) and 112.12(c)(4), listed below. **In cases where a provision is not applicable, write "N/A".**

| Table G-18 General Rule Requirements for Onshore Facilities | | N/A |
|---|---|---|
| **Facility Drainage Requirements** | | |
| Drainage from diked storage areas is restrained by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. Diked areas may be emptied by pumps or ejectors that must be manually activated after inspecting the condition of the accumulation to ensure no oil will be discharged. *[§§112.8(b)(1) and 112.12(b)(1)]* | ☒ | ☐ |
| Valves of manual, open-and-closed design are used for the drainage of diked areas. *[§§112.8(b)(2) and 112.12(b)(2)]* | ☒ | ☐ |
| Facility drainage systems from undiked areas with a potential for a discharge are designed to flow into ponds, lagoons, or catchment basins to retain oil or return it to the facility. Catchment basins are not located in areas subject to periodic flooding. *[§112.8(b)(3) and 112.12(b)(3)]* | ☒ | ☐ |
| If facility drainage is not engineered as in (b)(3) above, the facility will equip the final discharge of all ditches inside the facility with a diversion system that would, in the event of an uncontrolled discharge, retain oil in the facility. *[§112.8(b)(4) and 112.12(b)(4)]* | ☐ | ☒ |
| Where drainage waters are treated in more than one treatment unit and such treatment is continuous, and pump transfer is needed, two "lift" pumps are provided and at least one of the pumps is permanently installed. Whatever techniques are used, facility drainage systems have been engineered to prevent a discharge as described in §112.1(b) in case there is an equipment failure or human error at the facility. *[§112.8(b)(5) and 112.12(b)(5)]* | ☐ | ☒ |
| **Bulk Storage Container Requirements** | | |
| The containers at the facility are compatible with materials stored and conditions of storage such as pressure and temperature. *[§§112.8(c)(1) and 112.12(c)(1)]* | ☒ | ☐ |
| All facility bulk storage tank installations (including mobile or portable oil storage containers) provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. Diked areas are sufficiently impervious to contain discharged oil. *[§112.8(c)(2) & (c)(11)]* NOTE: Drive-over containment berms at roll-up doors and curb drain plug to be installed by 9/15/2015 | ☒ | ☐ |
| An alternative containment system has been provided consisting of a drainage trench enclosure arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond. *[§112.8(c)(2)]* NOTE: This is the loading dock drainage sump with locked, manual pump. | ☒ | ☐ |
| Mobile refuelers and/or other non-transportation related tank trucks are provided with general containment or other diversionary structures or equipment meeting §112.7(c) (see Table G-10). *[§112.8(c)(11)]* | ☐ | ☒ |
| Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). *[§112.8(c)(11)]* | ☒ | ☐ |
| **Diked Area Drainage** | | |
| If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse (bypassing any facility effluent treatment system) the following procedures will be implemented at the facility: *[§§112.8(c)(3)(i – iv) and 112.12(c)(3)(i – iv)]* | | ☐ |
| • Bypass valve is normally sealed closed NOTE: Curb drain plug to be installed by 9/15/2015 | ☒ | ☐ |
| • Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters or adjoining shorelines | ☒ | ☐ |
| • Bypass valve is opened and resealed following drainage under responsible supervision | ☒ | ☐ |
| • Adequate records of drainage are kept **[See Dike Drainage Log in Attachment 3.3]** | ☒ | ☐ |

- Checking the template boxes without understanding that the boxes are certified affirmations of compliance
  - Actually *complying?*

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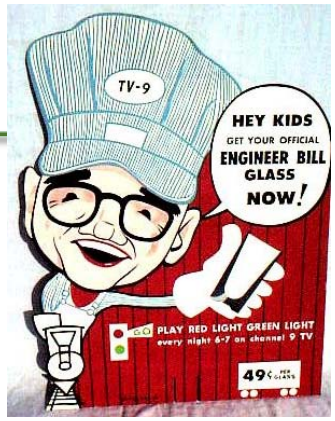
# PE Attestation: Five required attestations




- **In the certification, the PE attests that:**
  1. He (she) is familiar with the rule requirements
  2. He or his agent visited and examined the facility
  3. The Plan has been prepared in accordance with good engineering practice, including the consideration of applicable industry standards, and with the requirements of 40 CFR part 112
  4. Procedures for required inspections and testing have been established
  5. The Plan is adequate for the facility

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1.0 CERTIFICATIONS AND AMENDMENT LOG

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN (SPCC Plan)
FOR [redacted], CALIFORNIA

July 2007

Designated Person Accountable for Spill Prevention:

Director of [redacted]

MANAGEMENT APPROVAL

The [redacted] Division, is committed to the prevention of discharges of oil to navigable waters and the environment, and maintains the highest standards for spill prevention control and countermeasures through regular review, updating, and implementation of this SPCC Plan for the [redacted] facility. The [redacted] Division, is committed to supplying the manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful. A complete copy of this SPCC Plan will be maintained at the [redacted] facility and be available to the EPA Regional Administrator for on-site review.

Signature [redacted] Date 8/27/07

Title Director of [redacted]

PROFESSIONAL ENGINEER CERTIFICATION

I hereby certify that: (1) I am familiar with the provisions of Title 40 CFR, Part 112; (2) I or my agent visited and examined this facility; (3) this Spill Prevention, Control and Countermeasure Plan has been prepared in accordance with good engineering practices; (4) procedures for required inspections and testing have been established; and (5) this Plan is adequate for this facility. **THIS SPCC PLAN IS NOT FULLY CERTIFIED UNTIL THE REQUIREMENTS SET FORTH IN SECTION 6 (REQUIRED FACILITY CORRECTIONS) OF THIS SPCC PLAN ARE ACHIEVED. FAILURE TO IMPLEMENT THE REQUIRED FACILITY CORRECTIONS WILL RESULT IN NON-COMPLIANCE WITH THE PROVISIONS OF TITLE 40, CFR, PART 112.**

Engineer: [redacted] Seal:

Signature: [redacted]

Registration: [redacted]

Date: 8/21/07

Conditional PE certification/attestation? Wassup with the conditions? Should be addressed as a 112.7 discussion, explanation & schedule



# PE Attestation: An outdated attestation

- Newer Plan but old certification language?
  - Likely indicates Plan written/certified by someone not current with regulations
    - What else in the Plan is based on old rules?
- No PE recertification required for the 5-year review (or after the PE license expires)
  - Unless technical amendments

**CERTIFICATION**

I hereby certify that I, or my agent, have examined the facility, and being familiar with the provisions of Title 40 of the Code of Federal Regulations Part 112, I attest that this Spill Prevention, Control, and Countermeasure (SPCC) plan has been prepared in accordance with good engineering practices.

GEORGIA REGISTERED NO. [redacted] PROFESSIONAL ENGINEER

[redacted]
Printed Name of Professional Registered Engineer

[redacted]
Signature of Registered Professional Engineer

Registration No. [redacted] State: GA

## Containment

Preventing escape of problems since 1790

## Written Plan or Implementation Issues (may or may not be cited by the UPA as a violation [most are]… but still indicates substandard Plan or compliance)

- **Description or listing of sized secondary containment…**
  - Does not state containment volume or provide dimensions/ calculations
    - Not required… but very helpful to easily demonstrate/document volume compliance
    - Inaccurate
  - Does not address precipitation freeboard
  - Has insufficient capacity

Full capacity containment?
Precipitation freeboard?

The black containment pallets appear to have sufficient capacity for more than 6 inches of rain (plus the 55 gallon drum capacity).

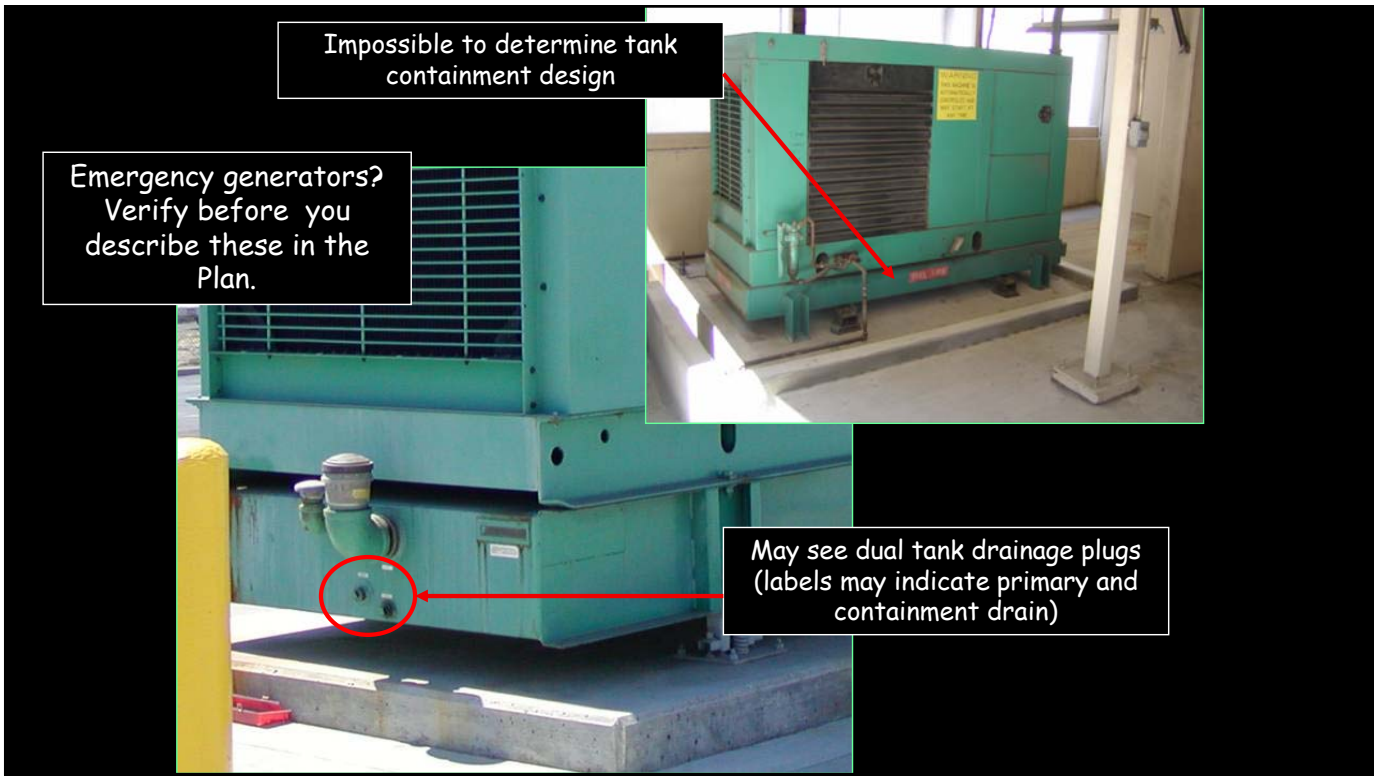
The yellow containment pallet would be sufficient for capacity of a 55 gallon drum – but has far less precipitation capacity. These yellow pallets may have been intended for inside use.

## Are All Containment Pallets 112.8(c)(11) Compliant?

Yes.
61 gallon liquid capacity with drum in place

No.
5 gallon liquid capacity with drum in place

No.
11 gallon liquid capacity with drum in place


Impossible to determine tank containment design


Full capacity containment?
Precipitation freeboard?

This containment area would have had sufficient containment and freeboard… but the roof (rain) drain dumps a LOT of storm water *directly* into this containment.

Again – field verify (and swivel/tilt your head) before writing the Plan.

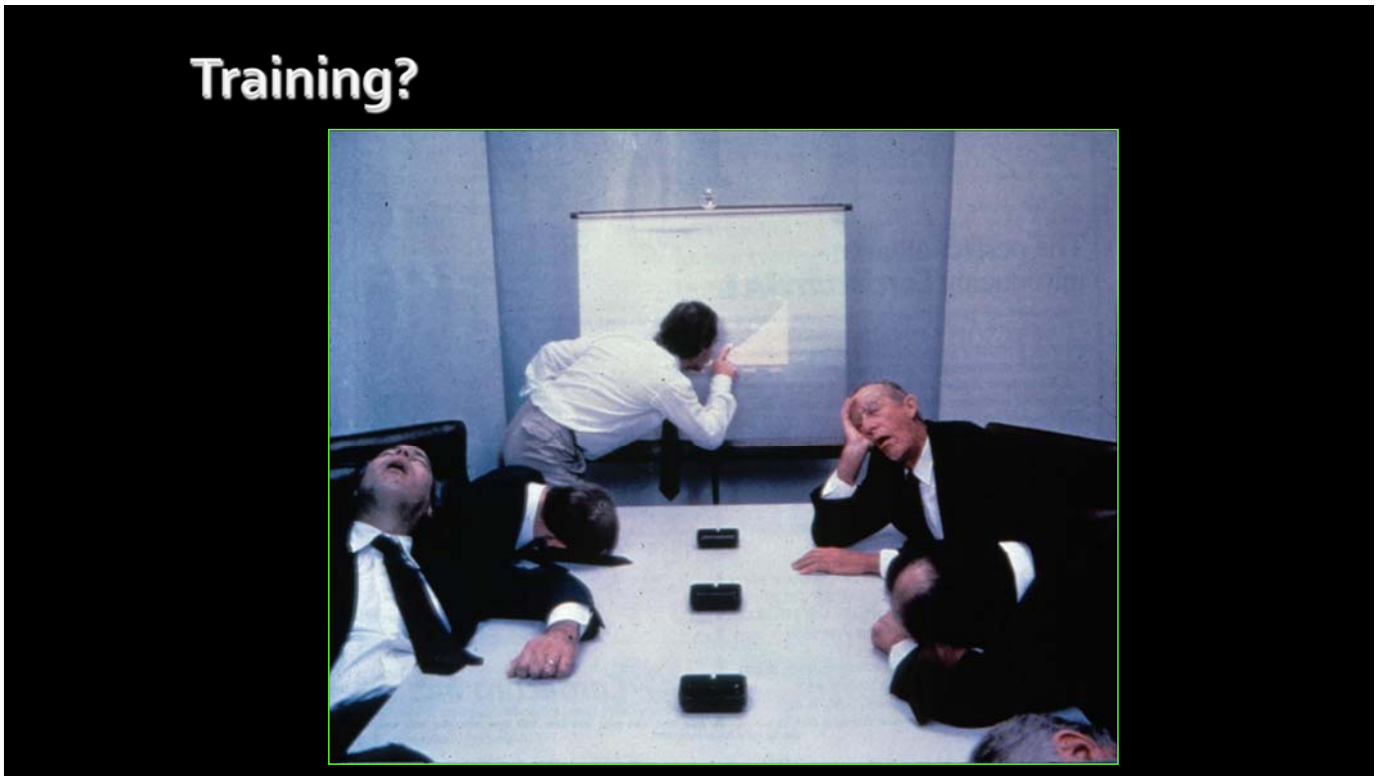

## Exercising the Contingency Plan?

And testing/validating the general containment assumptions


IN AN EMERGENCY

You are positively screwed.





**Environmental Training Attendance Record**

**Training Course:** ***Spill Prevention, Control &Countermeasure Plan*** ***(Initial Training)***

**Course Date:** | **Revision Number:** 1

**Instructor/Facilitator:** | **Page:** ____ of ____

**Topics Covered (based on Virgin Orbit – Mojave SPCC Training Outline):**

- Applicable oil pollution control laws
- Contents of the SPCC Plan
- Review of operation and maintenance of equipment to prevent discharges
- Discharge (spill response) procedure protocols
- Known discharges or spills to navigable waters
- Failures or malfunctioning components
- Recently developed precautionary measures

**Instructors Signature:**

| ***Printed*** **Name (first, last)** | **Signature** | **Department / Function** |
|---|---|---|
| | | |
| | | |

Typically, Plans simply state that training will be done and list the rule-required topics.

**Environmental Training Attendance Record**

**Training Course:** ***Spill Prevention, Control &Countermeasure Plan***
***(Annual Briefing)***

**Course Date:** | **Revision Number:**

**Instructor:** | **Page:** ____ of ____

**Topics Covered:**

- Overview of SPCC Plan and oil spill regulations
- Review of facility-specific SPCC Plan requirements (procedures, inspections, spill prevention)
- Past spill events (if any in past year), including
  - Discussion of causes
  - Discussion of corrective and preventive action
- Equipment or system failures or malfunctioning equipment (if any in past year)
- Recently developed precautionary or prevention measures (if any)

**Instructors Signature:**

| ***Printed*** **Name (first, last)** | **Signature** | **Department / Function** |
|---|---|---|
| | | |
| | | |

## *We create a facility-Plan specific training outline that can be used to assure better training*

Los Angeles County **Sheriff's Department**

**Initial Spill Prevention, Control & Countermeasure (SPCC) Plan Training**
**August 2015**

I. **What is an SPCC Plan?**
a. Requirement of the federal Oil Spill Prevention regulations (40 Code of Federal Regulations part 112) and California Aboveground Petroleum Storage Act (APSA – Cal. Health & Safety Code Chapter 6.67)

b. Requirements apply to oil & oil product storage, use & handling
i. Oils[1] of any type and at any concentration (California/county inspectors have jurisdiction over petroleum oils only) ... including diesel fuel, gasoline, motor, lube, gear, hydraulic and other oils, waste oil, kitchen oil and grease, oil-based paints and solvents; etc.
ii. All containers, tanks, oil-filled equipment with 55 gal. or greater capacity
1. Facility capacity 1,320 gal. and greater
2. Excludes hydraulic equipment & reservoirs on mobile equipment and their on-board fuel tanks
3. For LASD facilities & stations: Any 55 gallon drums containing oils, greases or used oils, aboveground gasoline and diesel fuel tanks, and emergency generator base tanks containing diesel fuel.

c. A 'Spill Provention, Control and Countermeasure (SPCC) Plan is a detailed, site-specific descriptive (engineer and management certified) plan describing how the facility meets the federal SPCC rules for
i. Oil spill **prevention** (through proper tank and container engineering and operation, overfill controls, implementation of operational procedures, rainwater drainage procedures and storm water controls, frequent inspections of containers and storage areas, integrity testing of tanks and containers, training, etc.)
ii. Oil spill **control** (through use of secondary containment and spill diversionary equipment, proper discharge valve design, emergency/discharge response procedures)

d. SPCC Plan and Plan implementation goal:
i. Prevent oil discharges from tanks, containers, storage areas and oil transfer, piping, loading/unloading, dispensing and handling areas
ii. Prevent any spill that does occur from reaching a 'navigable water' (i.e. any storm drain)
1. Reportable quantity? Enough oil to cause a sheen upon the water! i.e. – any amount

II. **SPCC Plans for LASD facilities and stations:**
a. SPCC Plans cannot simply sit on the shelf... they must be implemented (primarily inspections, procedures, equipment maintenance, spill control)

b. Must be reviewed at least every 5 years and updated if necessary (and within 6 months of any change)

[1] **The term 'oil' includes gasoline, diesel fuel and distillate solvents.**

**Training developed by:**
ESCI ENVIROSERVICES, INC.

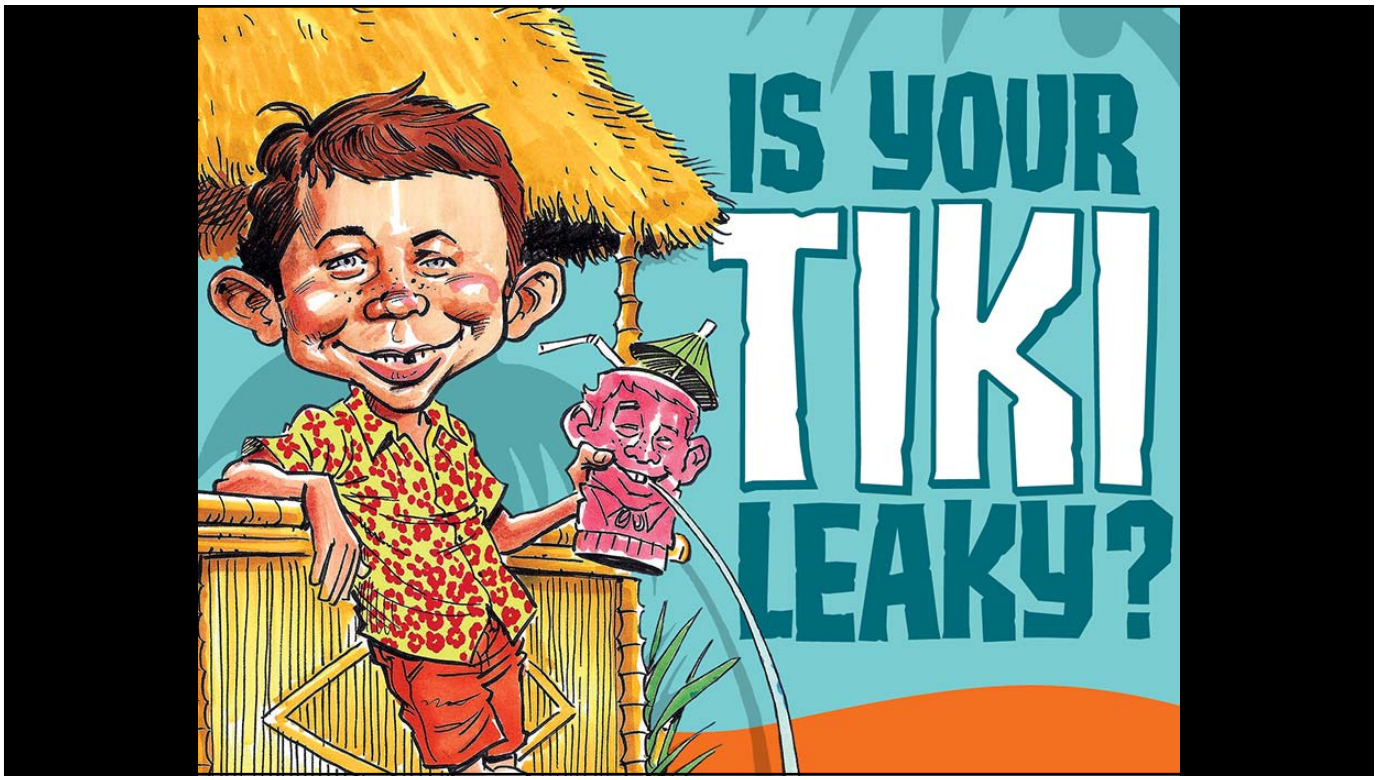
f. Written procedures are required and are in place for routine/frequent inspections of tanks, oil containers and storage areas (see next).

g. Inspections and integrity testing of tanks and containers (Written procedures are in place and are part of the inspection form(s) (SPCC Plan Appendix C).

i. The SPCC Plan and inspection forms contain the required written inspection procedures and schedule
1. Monthly for all aboveground tanks (and associated visible piping) and any oil drums and totes; and any containment areas.
ii. Must keep written inspection records/logs for at least three years (the procedure IS the log)
iii. Must inspect all fuel tanks, tank containments, leak indicators, any oil drums/totes, storage and staging areas, and the loading areas.
iv. Inspections should address (i.e. look at):
1. Leaks or oil loss (spills and spill residues) on outer tank or container surfaces
2. Leaks or oil loss (spills and spill residues) inside containment (containment leak gauge or leak sensor alarms/indicators)
3. Corrosion
4. Damage
5. Oil or fuel accumulation in containment areas or loading areas
6. Tank foundations and supports, drum storage flooring
7. Overfill prevention (high level) devices/systems (for damage and proper operation)
8. Visible valves/piping associated with tanks and containment areas (for damage [and proper closure for containment drain valves/caps])
a. If buried piping is uncovered: must inspect the exposed piping
9. Fuel dispenser hoses and nozzles

**Basic Loading/Unloading Procedures**
*Refer to and cover the various procedures in SPCC Plan Appendix H).*

1) Assure sufficient ullage/space in the tank for the amount of oil/fuel to be transferred
   a) Level gauges on top of fuel tanks or Veeder-Root monitoring & inventory gauging panel or gauge stick
2) Properly spot/stage the tanker vehicle
   a) Set cones/warnings
   b) Set brakes
   c) Chock wheels
3) Inspect delivery/transfer hoses, connections, piping
   a) Protected from traffic
   b) Inspect for damage and tight connections

# Any Questions?

**Steve Lichten**
**President, ESCI EnviroServices, Inc.**
**Orange, CA &**
**Long Beach, CA**
**714-322-0470 mobile**
**slichten@enviroservices.com**

# U.S. ENVIRONMENTAL PROTECTION AGENCY
# SPCC FIELD INSPECTION AND PLAN REVIEW CHECKLIST

**ONSHORE FACILITIES** (EXCLUDING OIL DRILLING, PRODUCTION AND WORKOVER)

## Overview of the Checklist

This checklist is designed to assist EPA inspectors in conducting a thorough and nationally consistent inspection of a facility's compliance with the Spill Prevention, Control, and Countermeasure (SPCC) rule at 40 CFR part 112. It is a required tool to help federal inspectors (or their contractors) record observations for the site inspection and review of the SPCC Plan. While the checklist is meant to be comprehensive, the inspector should always refer to the SPCC rule in its entirety, the SPCC Regional Inspector Guidance Document, and other relevant guidance for evaluating compliance. This checklist must be completed in order for an inspection to count toward an agency measure (i.e., OEM inspection measures or GPRA). The completed checklist and supporting documentation (i.e. photo logs or additional notes) serve as the inspection report.

This checklist addresses requirements for onshore facilities including Tier II Qualified Facilities (excluding facilities involved in oil drilling, production and workover activities) that meet the eligibility criteria set forth in §112.3(g)(2).

| Separate standalone checklists address requirements for: |
|---|
| Onshore oil drilling, production, and workover facilities including Tier II Qualified Facilities as defined in §112.3(g)(2); |
| Offshore drilling, production and workover facilities; and |
| Tier I Qualified Facilities (for facilities that meet the eligibility criteria defined in §112.3(g)(1)) |

Qualified facilities must meet the rule requirements in §112.6 and other applicable sections specified in §112.6, except for deviations that provide environmental equivalence and secondary containment impracticability determinations as allowed under §112.6.

The checklist is organized according to the SPCC rule. Each item in the checklist identifies the relevant section and paragraph in 40 CFR part 112 where that requirement is stated.

- Sections 112.1 through 112.5 specify the applicability of the rule and requirements for the preparation, implementation, and amendment of SPCC Plans. For these sections, the checklist includes data fields to be completed, as well as several questions with "yes," "no" or "NA" answers.
- Section 112.6 includes requirements for qualified facilities.
- Section 112.7 includes general requirements that apply to all facilities (unless otherwise excluded).
- Sections 112.8 and 112.12 specify requirements for spill prevention, control, and countermeasures for onshore facilities (excluding production facilities).

The inspector needs to evaluate whether the requirement is addressed adequately or inadequately in the SPCC Plan and whether it is implemented adequately in the field (either by field observation or record review). For the SPCC Plan and implementation in the field, if a requirement is addressed adequately, mark the "Yes" box in the appropriate column. If a requirement is not addressed adequately, mark the "No" box. If a requirement does not apply to the particular facility or the question asked is not appropriate for the facility, mark the "NA" box. Discrepancies or descriptions of inspector interpretation of "No" vs. "NA" may be documented in the comments box subsequent to each section. If a provision of the rule applies only to the SPCC Plan, the "Field" column is shaded.

Space is provided in each section to record comments. Additional space is available on the comments page at the end of the checklist. Comments should remain factual and support the evaluation of compliance.

Appendices

- Appendix A is for recording information about containers and other locations at the facility that require secondary containment.
- Appendix B is a checklist for documentation of the tests and inspections the facility operator is required to keep with the SPCC Plan.
- Appendix C is a checklist for oil spill contingency plans following 40 CFR 109. Unless a facility has submitted a Facility Response Plan (FRP) under 40 CFR 112.20, a contingency plan following 40 CFR 109 is required if a facility determines that secondary containment is impracticable as provided in 40 CFR 112.7(d). The same requirement for an oil spill contingency plan applies to the owner or operator of a facility with qualified oil-filled operational equipment that chooses to implement alternative requirements instead of general secondary containment requirements.

| FACILITY INFORMATION | | | |
|---|---|---|---|
| FACILITY NAME: | | | |
| LATITUDE: | LONGITUDE: | Section/Township/Range: | |
| FRS#: | OIL DATABASE ID NO: | ICIS#: | |
| ADDRESS: | | | |
| CITY: | STATE: | ZIP: | COUNTY: |
| MAILING ADDRESS (IF DIFFERENT FROM FACILITY ADDRESS – IF NOT, PRINT "SAME"): | | | |
| CITY: | STATE: | ZIP: | COUNTY: |
| TELEPHONE: | FACILITY REPRESENTATIVE NAME: | | |
| OWNER NAME: | | | |
| OWNER ADDRESS: | | | |
| CITY: | STATE: | ZIP: | COUNTY: |
| OWNER CONTACT PERSON: | | | |
| TELEPHONE: | FAX: | EMAIL: | |
| FACILITY OPERATOR NAME (IF DIFFERENT FROM OWNER – IF NOT, PRINT "SAME"): | | | |
| OPERATOR ADDRESS: | | | |
| CITY: | STATE: | ZIP: | COUNTY: |
| TELEPHONE: | OPERATOR CONTACT PERSON: | | |
| FACILITY TYPE: | | | NAICS CODE: |
| HOURS PER DAY FACILITY ATTENDED: | | TOTAL FACILITY CAPACITY: | |
| TYPE(S) OF OIL STORED: | | | |
| LOCATED IN INDIAN COUNTRY? ☐ YES ☐ NO RESERVATION NAME: | | | |

| INSPECTION INFORMATION | | |
|---|---|---|
| INSPECTION DATE: | TIME: | ACTIVITY ID NO: |
| LEAD INSPECTOR: | | |
| OTHER INSPECTOR(S): | | |

| INSPECTOR ACKNOWLEDGMENT | |
|---|---|
| *I performed an SPCC inspection at the facility specified above.* | |
| INSPECTOR SIGNATURE: | DATE: |

## FACILITY RESPONSE PLAN (FRP) APPLICABILITY

A non-transportation related onshore facility is required to prepare and implement an FRP as outlined in 40 CFR 112.20 if:

- ☐ The facility transfers oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 U.S. gallons, **OR**
- ☐ The facility has a total oil storage capacity of at least 1 million U.S. gallons, **AND** at least one of the following is true:
  - ☐ The facility does not have secondary containment sufficiently large to contain the capacity of the largest aboveground tank plus sufficient freeboard for precipitation.
  - ☐ The facility is located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments.
  - ☐ The facility is located such that a discharge would shut down a public drinking water intake.
  - ☐ The facility has had a reportable discharge greater than or equal to 10,000 U.S. gallons in the past 5 years.

| Facility has FRP: ☐ Yes ☐ No ☐ Not Required | FRP Number: |
|---|---|

Facility has a completed and signed copy of Appendix C, Attachment C-II, "Certification of the Applicability of the Substantial Harm Criteria." ☐ Yes ☐ No

Comments:

## SPCC GENERAL APPLICABILITY—40 CFR 112.1

IS THE FACILITY REGULATED UNDER 40 CFR part 112?

The completely buried oil storage capacity is over 42,000 U.S. gallons, **OR** the aggregate aboveground oil storage capacity is over 1,320 U.S. gallons **AND** ☐ Yes ☐ No

The facility is a non-transportation-related facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States ☐ Yes ☐ No

| AFFECTED WATERWAY(S): | DISTANCE: |
|---|---|

FLOW PATH TO WATERWAY:

*Note: The following storage capacity is not considered in determining applicability of SPCC requirements:*

- *Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993; Tank trucks that return to an otherwise regulated facility that contain only residual amounts of oil (EPA Policy letter)*
- *Completely buried tanks subject to all the technical requirements of 40 CFR part 280 or a state program approved under 40 CFR part 281;*
- *Underground oil storage tanks deferred under 40 CFR part 280 that supply emergency diesel generators at a nuclear power generation facility licensed by the Nuclear Regulatory Commission (NRC) and subject to any NRC provision regarding design and quality criteria, including but not limited to CFR part 50;*
- *Any facility or part thereof used exclusively for wastewater treatment (production, recovery or recycling of oil is not considered wastewater treatment); (This does not include other oil containers located at a wastewater treatment facility, such as generator tanks or transformers)*
- *Containers smaller than 55 U.S. gallons;*
- *Permanently closed containers (as defined in §112.2);*
- *Motive power containers(as defined in §112.2);*
- *Hot-mix asphalt or any hot-mix asphalt containers;*
- *Heating oil containers used solely at a single-family residence;*
- *Pesticide application equipment and related mix containers;*
- *Any milk and milk product container and associated piping and appurtenances; and*
- *Intra-facility gathering lines subject to the regulatory requirements of 49 CFR part 192 or 195.*

Does the facility have an SPCC Plan? ☐ Yes ☐ No

## SPCC TIER II QUALIFIED FACILITY APPLICABILITY—40 CFR 112.3(g)(2)

| | |
|---|---|
| The aggregate aboveground oil storage capacity is 10,000 U.S. gallons or less **AND** | ☐Yes ☐No |
| In the three years prior to the SPCC Plan self-certification date, or since becoming subject to the rule (if the facility has been in operation for less than three years), the facility has **NOT** had: | |
| • A single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons, **OR** | ☐Yes ☐No |
| • Two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve-month period[1] | ☐Yes ☐No |

IF ***YES*** TO ALL OF THE ABOVE, THEN THE FACILITY IS CONSIDERED A TIER II QUALIFIED FACILITY[2]

## REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC PLAN—40 CFR 112.3

Date facility began operations:

| | |
|---|---|
| Date of initial SPCC Plan preparation: | Current Plan version (date/number): |

| | | |
|---|---|---|
| **112.3(a)** | **For facilities (except farms), including mobile or portable facilities:** | |
| | • In operation on or prior to November 10, 2011: Plan prepared and/or amended and fully implemented by **November 10, 2011** | ☐Yes ☐No ☐NA |
| | • Beginning operations after November 10, 2011, Plan prepared and fully implemented before beginning operations | ☐Yes ☐No ☐NA |
| | **For farms (as defined in §112.2):** | |
| | • In operation on or prior to August 16, 2002: Plan maintained, amended and implemented by **May 10, 2013** | ☐Yes ☐No ☐NA |
| | • Beginning operations after August 16, 2002 through May 10, 2013: Plan prepared and fully implemented by **May 10, 2013** | ☐Yes ☐No ☐NA |
| | • Beginning operations after May 10, 2013: Plan prepared and fully implemented before beginning operations | ☐Yes ☐No ☐NA |
| **112.3(d)** | Plan is certified by a registered Professional Engineer (PE) and includes statements that the PE attests: | ☐Yes ☐No ☐NA |
| | • PE is familiar with the requirements of 40 CFR part 112 | ☐Yes ☐No ☐NA |
| | • PE or agent has visited and examined the facility | ☐Yes ☐No ☐NA |
| | • Plan is prepared in accordance with good engineering practice including consideration of applicable industry standards and the requirements of 40 CFR part 112 | ☐Yes ☐No ☐NA |
| | • Procedures for required inspections and testing have been established | ☐Yes ☐No ☐NA |
| | • Plan is adequate for the facility | ☐Yes ☐No ☐NA |

| | | | |
|---|---|---|---|
| PE Name: | License No.: | State: | Date of certification: |

| | | |
|---|---|---|
| **112.3(e)(1)** | Plan is available onsite if attended at least 4 hours per day. If facility is unattended, Plan is available at the nearest field office.<br>*(Please note nearest field office contact information in comments section below.)* | ☐Yes ☐No ☐NA |

Comments:

[1] Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

[2] An owner/operator who self-certifies a Tier II SPCC Plan may not include any environmentally equivalent alternatives or secondary containment impracticability determinations unless reviewed and certified by a PE.

## AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112.4

| | | |
|---|---|---|
| **112.4(a),(c)** | Has the facility discharged more than 1,000 U.S. gallons of oil in a single reportable discharge or more than 42 U.S. gallons in each of two reportable discharges in any 12-month period?[3] | ☐Yes ☐No |
| If **YES** | • Was information submitted to the RA as required in §112.4(a)?[4] | ☐Yes ☐No ☐NA |
| | • Was information submitted to the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located§112.4(c) | ☐Yes ☐No ☐NA |
| | • Date(s) and volume(s) of reportable discharges(s) under this section: _____ | |
| | • Were the discharges reported to the NRC[5]? | ☐Yes ☐No |
| **112.4(d),(e)** | Have changes required by the RA been implemented in the Plan and/or facility? | ☐Yes ☐No ☐NA |
| Comments: | | |

## AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5

| | | |
|---|---|---|
| **112.5(a)** | Has there been a change at the facility that materially affects the potential for a discharge described in §112.1(b)? | ☐Yes ☐No |
| If **YES** | • Was the Plan amended within six months of the change? | ☐Yes ☐No |
| **112.5(b)** | Review and evaluation of the Plan completed at least once every 5 years? | ☐Yes ☐No ☐NA |
| | Following Plan review, was Plan amended within six months to include more effective prevention and control technology that has been field-proven to significantly reduce the likelihood of a discharge described in §112.1(b)? | ☐Yes ☐No ☐NA |
| | Amendments implemented within six months of any Plan amendment? | ☐Yes ☐No ☐NA |
| | Five year Plan review and evaluation documented? | ☐Yes ☐No ☐NA |
| **112.5(c)** | Professional Engineer certification of any technical Plan amendments in accordance with all applicable requirements of §112.3(d) *[Except for self-certified Plans]* | ☐Yes ☐No ☐NA |

| | | | |
|---|---|---|---|
| Name: | License No.: | State: | Date of certification: |
| Reason for amendment: | | | |

| | |
|---|---|
| Plan amended within six months of the change? | ☐Yes ☐No ☐NA |
| Amendments implemented within six months of any Plan amendment? | ☐Yes ☐No ☐NA |
| Comments: | |

[3] A reportable discharge is a discharge as described in §112.1(b)(see 40 CFR part 110). The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination

[4] Triggering this threshold may disqualify the facility from meeting the Qualified Facility criteria if it occurred in the three years prior to self certification

[5] Inspector Note-Confirm any spills identified above were reported to NRC

| TIER II QUALIFIED FACILITY PLAN REQUIREMENTS —40 CFR 112.6(b) | | |
|---|---|---|
| **112.6(b)(1)** | **Plan Certification:** Owner/operator certified in the Plan that: | ☐Yes ☐No ☐NA |
| (i) | He or she is familiar with the requirements of 40 CFR part 112 | ☐Yes ☐No ☐NA |
| (ii) | He or she has visited and examined the facility[6] | ☐Yes ☐No ☐NA |
| (iii) | The Plan has been prepared in accordance with accepted and sound industry practices and standards and with the requirements of this part | ☐Yes ☐No ☐NA |
| (iv) | Procedures for required inspections and testing have been established | ☐Yes ☐No ☐NA |
| (v) | He or she will fully implement the Plan | ☐Yes ☐No ☐NA |
| (vi) | The facility meets the qualification criteria set forth under §112.3(g)(2) | ☐Yes ☐No ☐NA |
| (vii) | The Plan does not deviate from any requirements as allowed by §§112.7(a)(2) and 112.7(d), except as described under §112.6(b)(3)(i) or (ii) | ☐Yes ☐No ☐NA |
| (viii) | The Plan and individual(s) responsible for implementing the Plan have the full approval of management and the facility owner or operator has committed the necessary resources to fully implement the Plan. | ☐Yes ☐No ☐NA |
| **112.6(b)(2)** | **Technical Amendments:** The owner/operator self-certified the Plan's technical amendments for a change in facility design, construction, operation, or maintenance that affected potential for a §112.1(b) discharge | ☐Yes ☐No ☐NA |
| If **YES** | • Certification of technical amendments is in accordance with the self-certification provisions of §112.6(b)(1). | ☐Yes ☐No ☐NA |
| (i) | A PE certified a portion of the Plan (i.e., Plan is informally referred to as a hybrid Plan) | ☐Yes ☐No ☐NA |
| If **YES** | • The PE also certified technical amendments that affect the PE certified portion of the Plan as required under §112.6(b)(4)(ii) | ☐Yes ☐No ☐NA |
| (ii) | The aggregate aboveground oil storage capacity increased to more than 10,000 U.S. gallons as a result of the change | ☐Yes ☐No ☐NA |
| If **YES** | *The facility no longer meets the Tier II qualifying criteria in §112.3(g)(2) because it exceeds 10,000 U.S. gallons in aggregate aboveground storage capacity.* | |
| | The owner/operator prepared and implemented a Plan within 6 months following the change and had it certified by a PE under §112.3(d) | ☐Yes ☐No ☐NA |
| **112.6(b)(3)** | **Plan Deviations:** Does the Plan include environmentally equivalent alternative methods or impracticability determinations for secondary containment? | ☐Yes ☐No ☐NA |
| If **YES** | Identify the alternatives in the hybrid Plan: | |
| | • Environmental equivalent alternative method(s) allowed under §112.7(a)(2); | ☐Yes ☐No ☐NA |
| | • Impracticability determination under §112.7(d) | ☐Yes ☐No ☐NA |
| **112.6(b)(4)** | • For each environmentally equivalent measure, the Plan is accompanied by a written statement by the PE that describes: the reason for nonconformance, the alternative measure, and how it offers equivalent environmental protection in accordance with §112.7(a)(2); | ☐Yes ☐No ☐NA |
| | • For each secondary containment impracticability determination, the Plan explains the reason for the impracticability determination and provides the alternative measures to secondary containment required in §112.7(d) | ☐Yes ☐No ☐NA |
| | **AND** | |
| (i) | PE certifies in the Plan that: | |
| (A) | He/she is familiar with the requirements of 40 CFR Part 112 | ☐Yes ☐No ☐NA |
| (B) | He/she or a representative agent has visited and examined the facility | ☐Yes ☐No ☐NA |
| (C) | The alternative method of environmental equivalence in accordance with §112.7(a)(2) or the determination of impracticability and alternative measures in accordance with §112.7(d) is consistent with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112. | ☐Yes ☐No ☐NA |
| Comments: | | |

[6] Note that only the person certifying the Plan can make the site visit

| GENERAL SPCC REQUIREMENTS—40 CFR 112.7 | | PLAN | FIELD |
|---|---|---|---|
| Management approval at a level of authority to commit the necessary resources to fully implement the Plan[7] | | ☐Yes ☐No | |
| Plan follows sequence of the rule or is an equivalent Plan meeting all applicable rule requirements and includes a cross-reference of provisions | | ☐Yes ☐No ☐NA | |
| If Plan calls for facilities, procedures, methods, or equipment not yet fully operational, details of their installation and start-up are discussed *(Note: Relevant for inspection evaluation and testing baselines.)* | | ☐Yes ☐No ☐NA | |
| **112.7(a)(2)** | The Plan includes deviations from the requirements of §§112.7(g), (h)(2) and (3), and (i) and applicable subparts B and C of the rule, except the secondary containment requirements in §§112.7(c) and (h)(1), 112.8(c)(2),112.8(c)(11), 112.12(c)(2), and 112.12(c)(11) | ☐Yes ☐No ☐NA | |
| If **YES** | • The Plan states reasons for nonconformance | ☐Yes ☐No ☐NA | |
| | • Alternative measures described in detail and provide equivalent environmental protection *(Note: Inspector should document if the environmental equivalence is implemented in the field, in accordance with the Plan's description)* | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| Describe each deviation and reasons for nonconformance: | | | |
| **112.7(a)(3)** | Plan describes physical layout of facility and includes a diagram[8] that identifies:<br>• Location and contents of all regulated fixed oil storage containers<br>• Storage areas where mobile or portable containers are located<br>• Completely buried tanks otherwise exempt from the SPCC requirements (marked as "exempt")<br>• Transfer stations<br>• Connecting pipes, including intra-facility gathering lines that are otherwise exempt from the requirements of this part under §112.1(d)(11) | ☐Yes ☐No | ☐Yes ☐No |
| | Plan addresses each of the following: | | |
| (i) | For each fixed container, type of oil and storage capacity (see Appendix A of this checklist). For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities | ☐Yes ☐No | ☐Yes ☐No |
| (ii) | Discharge prevention measures, including procedures for routine handling of products (loading, unloading, and facility transfers, etc.) | ☐Yes ☐No | ☐Yes ☐No |
| (iii) | Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge | ☐Yes ☐No | ☐Yes ☐No |
| (iv) | Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources) | ☐Yes ☐No | ☐Yes ☐No |
| (v) | Methods of disposal of recovered materials in accordance with applicable legal requirements | ☐Yes ☐No | |
| (vi) | Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with an agreement for response, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b) | ☐Yes ☐No | |

[7] May be part of the Plan or demonstrated elsewhere.
[8] Note in comments any discrepancies between the facility diagram, the description of the physical layout of facility, and what is observed in the field

| | | PLAN | FIELD |
|---|---|---|---|
| **112.7(a)(4)** | ***Does not apply if the facility has submitted an FRP under §112.20:*** ☐Yes ☐No ☐NA<br>Plan includes information and procedures that enable a person reporting an oil discharge as described in §112.1(b) to relate information on the:<br>• Exact address or location and phone number of the facility;<br>• Date and time of the discharge;<br>• Type of material discharged;<br>• Estimates of the total quantity discharged;<br>• Estimates of the quantity discharged as described in §112.1(b);<br>• Source of the discharge;<br>• Description of all affected media;<br>• Cause of the discharge;<br>• Damages or injuries caused by the discharge;<br>• Actions being used to stop, remove, and mitigate the effects of the discharge;<br>• Whether an evacuation may be needed; and<br>• Names of individuals and/or organizations who have also been contacted. | | |
| **112.7(a)(5)** | ***Does not apply if the facility has submitted a FRP under §112.20:***<br>Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency | ☐Yes ☐No ☐NA | |
| **112.7(b)** | Plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure | ☐Yes ☐No ☐NA | |
| **112.7(c)** | Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in §112.1(b), **except as provided in §112.7(k) of this section for certain qualified operational equipment**. The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method, design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. See Appendix A of this checklist.<br>**For onshore facilities**, one of the following or its equivalent:<br>• Dikes, berms, or retaining walls sufficiently impervious to contain oil;<br>• Curbing or drip pans;<br>• Sumps and collection systems;<br>• Culverting, gutters or other drainage systems;<br>• Weirs, booms or other barriers;<br>• Spill diversion pond;<br>• Retention ponds; or<br>• Sorbent materials. | | |
| | Identify which of the following are present at the facility and if appropriate containment and/or diversionary structures or equipment are provided as described above: | | |
| | ☐ Bulk storage containers | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐ Mobile/portable containers | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐ Oil-filled operational equipment (as defined in 112.2) | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐ Other oil-filled equipment (i.e., manufacturing equipment) | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐ Piping and related appurtenances | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐ Mobile refuelers or non-transportation-related tank cars | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐ Transfer areas, equipment and activities | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ☐ Identify any other equipment or activities that are not listed above: _____ | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |

Comments:

| | | PLAN | FIELD |
|---|---|---|---|
| **112.7(d)** | Secondary containment for one (or more) of the following provisions is determined to be impracticable:<br>☐ General secondary containment §112.7(c)<br>☐ Bulk storage containers §§112.8(c)(2)/112.12(c)(2)<br>☐ Loading/unloading rack §112.7(h)(1)<br>☐ Mobile/portable containers§§112.8(c)(11)/112.12(c)(11) | ☐Yes ☐No | |
| If **YES** | • The impracticability of secondary containment is clearly demonstrated and described in the Plan | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | • For bulk storage containers,[9] periodic integrity testing of containers and integrity and leak testing of the associated valves and piping is conducted | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ***(Does not apply if the facility has submitted a FRP under §112.20):*** | | |
| | • Contingency Plan following the provisions of 40 CFR part 109 is provided (see Appendix C of this checklist) **AND** | ☐Yes ☐No ☐NA | |
| | • Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| **112.7(e)** | Inspections and tests conducted in accordance with written procedures | ☐Yes ☐No | ☐Yes ☐No |
| | Record of inspections or tests signed by supervisor or inspector | ☐Yes ☐No | ☐Yes ☐No |
| | Kept with Plan for at least 3 years (see Appendix B of this checklist)[10] | ☐Yes ☐No | ☐Yes ☐No |
| **112.7(f)** | Personnel, training, and oil discharge prevention procedures | | |
| (1) | Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of SPCC Plan | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (2) | Person designated as accountable for discharge prevention at the facility and reports to facility management | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (3) | Discharge prevention briefings conducted at least once a year for oil handling personnel to assure adequate understanding of the Plan. Briefings highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures | ☐Yes ☐No ☐ NA | ☐Yes ☐No ☐NA |
| **112.7(g)** | Plan describes how to:<br>• Secure and control access to the oil handling, processing and storage areas;<br>• Secure master flow and drain valves;<br>• Prevent unauthorized access to starter controls on oil pumps;<br>• Secure out-of-service and loading/unloading connections of oil pipelines; and<br>• Address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges. | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| Comments: | | | |

[9] These additional requirements apply only to bulk storage containers, when an impracticability determination has been made by the PE
[10] Records of inspections and tests kept under usual and customary business practices will suffice

| | | PLAN | FIELD |
|---|---|---|---|
| **112.7(h)** | Tank car and tank truck loading/unloading rack[11] is present at the facility ☐Yes ☐No<br>*Loading/unloading rack* means a fixed structure (such as a platform, gangway) necessary for loading or unloading a tank truck or tank car, which is located at a facility subject to the requirements of this part. A loading/unloading rack includes a loading or unloading arm, and may include any combination of the following: piping assemblages, valves, pumps, shut-off devices, overfill sensors, or personnel safety devices. | | |
| If **YES** (1) | Does loading/unloading rack drainage flow to catchment basin or treatment facility designed to handle discharges or use a quick drainage system? | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | Containment system holds at least the maximum capacity of the largest single compartment of a tank car/truck loaded/unloaded at the facility | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (2) | An interlocked warning light or physical barriers, warning signs, wheel chocks, or vehicle brake interlock system in the area adjacent to the **loading or unloading rack** to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (3) | Lower-most drains and all outlets on tank cars/trucks inspected prior to filling/departure, and, if necessary ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| **112.7(i)** | Brittle fracture evaluation of field-constructed aboveground containers is conducted after tank repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or after a discharge/failure due to brittle fracture or other catastrophe, and appropriate action taken as necessary (applies to only field-constructed aboveground containers) | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| **112.7(j)** | Discussion of conformance with applicable more stringent State rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR part 112 | ☐Yes ☐No ☐NA | |
| **112.7(k)** | Qualified oil-filled operational equipment is present at the facility[12] ☐Yes ☐No<br>*Oil-filled operational equipment* means equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g. , those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device. | | |
| If **YES** | Check which apply:<br>☐ Secondary Containment provided in accordance with 112.7(c)<br>☐ Alternative measure described below (confirm eligibility) | | |
| **112.7(k)** | Qualified Oil-Filled Operational Equipment<br>• Has a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within the three years prior to Plan certification date? ☐Yes ☐No ☐NA<br>• Have two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?[13] ☐Yes ☐No ☐NA | | |
| | *If **YES** for either, secondary containment in accordance with §112.7(c) is required* | | |
| | • Facility procedure for inspections or monitoring program to detect equipment failure and/or a discharge is established and documented | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | ***Does not apply if the facility has submitted a FRP under §112.20:***<br>• Contingency plan following 40 CFR part 109 (see Appendix C checklist) is provided in Plan **AND** | ☐Yes ☐No ☐NA | |
| | • Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in Plan | ☐Yes ☐No ☐NA | |

[11] Note that a tank car/truck loading/unloading rack must be present for §112.7(h) to apply
[12] This provision does not apply to oil-filled manufacturing equipment (flow-through process)
[13] Do not include oil discharges that result from natural disasters, acts of war, or terrorism in this qualification determination

| ONSHORE FACILITIES (EXCLUDING PRODUCTION)<br>40 CFR 112.8/112.12 | | PLAN | FIELD |
|---|---|---|---|
| **112.8(b)/ 112.12(b) Facility Drainage** | | | |
| Diked Areas<br>(1) | Drainage from diked storage areas is:<br>• Restrained by valves, except where facility systems are designed to control such discharge, **OR**<br>• Manually activated pumps or ejectors are used and the condition of the accumulation is inspected prior to draining dike to ensure no oil will be discharged | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (2) | Diked storage area drain valves are manual, open-and-closed design (not flapper-type drain valves) | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | If drainage is released directly to a watercourse and not into an onsite wastewater treatment plant, retained storm water is inspected and discharged per §§112.8(c)(3)(ii), (iii), and (iv) or §§112.12(c)(3)(ii), (iii), and (iv). | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| Undiked Areas<br>(3) | Drainage from undiked areas with a potential for discharge designed to flow into ponds, lagoons, or catchment basins to retain oil or return it to facility. Catchment basin located away from flood areas.[14] | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (4) | If facility drainage not engineered as in (b)(3) (i.e., drainage flows into ponds, lagoons, or catchment basins) then the facility is equipped with a diversion system to retain oil in the facility in the event of an uncontrolled discharge.[15] | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (5) | Are facility drainage waters continuously treated in more than one treatment unit and pump transfer is needed? | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| If ***YES*** | • Two "lift" pumps available and at least one permanently installed | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | • Facility drainage systems engineered to prevent a discharge as described in §112.1(b) in the case of equipment failure or human error | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| Comments: | | | |
| **112.8(c)/112.12(c) Bulk Storage Containers** ☐NA<br>*Bulk storage container* means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.<br>*If bulk storage containers are not present, mark this section Not Applicable (NA). If present, complete this section and Appendix A of this checklist.* | | | |
| (1) | Containers materials and construction are compatible with material stored and conditions of storage such as pressure and temperature | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (2) | Except for mobile refuelers and other non-transportation-related tank trucks, construct all bulk storage tank installations with secondary containment to hold capacity of largest container and sufficient freeboard for precipitation | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | Diked areas sufficiently impervious to contain discharged oil **OR** | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | Alternatively, any discharge to a drainage trench system will be safely confined in a facility catchment basin or holding pond | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |

[14] Do not include oil discharges that result from natural disasters, acts of war, or terrorism in this qualification determination.
[15] These provisions apply only when a facility drainage system is used for containment; otherwise mark NA

| | | PLAN | FIELD |
|---|---|---|---|
| (3) | Is there drainage of uncontaminated rainwater from diked areas into a storm drain or open watercourse? | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| If **YES** | • Bypass valve normally sealed closed | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | • Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b) | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | • Bypass valve opened and resealed under responsible supervision | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | • Adequate records of drainage are kept; for example, records required under permits issued in accordance with 40 CFR §§122.41(j)(2) and (m)(3) | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (4) | For completely buried metallic tanks installed on or after January 10, 1974 (if not exempt from SPCC regulation because subject to all of the technical requirements of 40 CFR part 280 or 281): | | |
| | • Provide corrosion protection with coatings or cathodic protection compatible with local soil conditions | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | • Regular leak testing conducted | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (5) | The buried section of partially buried or bunkered metallic tanks protected from corrosion with coatings or cathodic protection compatible with local soil conditions | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (6) | • Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. Techniques include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other system of non-destructive testing | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | • Appropriate qualifications for personnel performing tests and inspections are identified in the Plan and have been assessed in accordance with industry standards | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | • The frequency and type of testing and inspections are documented, are in accordance with industry standards and take into account the container size, configuration and design | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | • Comparison records of aboveground container integrity testing are maintained | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | • Container supports and foundations regularly inspected | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | • Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | • Records of all inspections and tests maintained[16] | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| Integrity Testing Standard identified in the Plan: | | | |
| | Conduct formal visual inspection on a regular schedule for bulk storage containers that meet all of the following conditions:<br>• Subject to 21 CFR part 110;<br>• Elevated;<br>• Constructed of austenitic stainless steel;<br>• Have no external insulation; and<br>• Shop-fabricated. | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| | You must determine and document in the Plan the appropriate qualifications for personnel performing tests and inspections.[16] | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |

[16] Records of inspections and tests kept under usual and customary business practices will suffice

| | | PLAN | FIELD |
|---|---|---|---|
| (7) | Leakage through defective internal heating coils controlled:<br>• Steam returns and exhaust lines from internal heating coils that discharge into an open watercourse are monitored for contamination, **OR**<br>• Steam returns and exhaust lines pass through a settling tank, skimmer, or other separation or retention system | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA |
| (8) | Each container is equipped with at least one of the following for liquid level sensing:<br>• High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station, or audible air vent in smaller facilities;<br>• High liquid level pump cutoff devices set to stop flow at a predetermined container content level;<br>• Direct audible or code signal communication between container gauger and pumping station; or<br>• Fast response system for determining liquid level (such as digital computers, telepulse, or direct vision gauges) and a person present to monitor gauges and overall filling of bulk containers.<br>☐ Liquid level **sensing devices regularly tested to ensure** proper operation<br>*(check if liquid level sensing devices are present at the facility and the Plan addresses testing)* | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (9) | Effluent treatment facilities observed frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b) | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (10) | Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (11) | Mobile or portable containers positioned to prevent a discharge as described in §112.1(b).<br>Mobile or portable containers (excluding mobile refuelers and other non-transportation-related tank trucks) have secondary containment with sufficient capacity to contain the largest single compartment or container and sufficient freeboard to contain precipitation | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA |
| **112.8(d)/112.12(d)Facility transfer operations, pumping, and facility process** | | | |
| (1) | Buried piping installed or replaced on or after August 16, 2002 has protective wrapping or coating<br>Buried piping installed or replaced on or after August 16, 2002 is also cathodically protected or otherwise satisfies corrosion protection standards for piping in 40 CFR part 280 or 281<br>Buried piping exposed for any reason is inspected for deterioration; corrosion damage is examined; and corrective action is taken | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA |
| (2) | Piping terminal connection at the transfer point is marked as to origin and capped or blank-flanged when not in service or in standby service for an extended time | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (3) | Pipe supports are properly designed to minimize abrasion and corrosion and allow for expansion and contraction | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| (4) | Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly to assess their general condition<br>Integrity and leak testing conducted on buried piping at time of installation, modification, construction, relocation, or replacement | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA<br>☐Yes ☐No ☐NA |
| (5) | Vehicles warned so that no vehicle endangers aboveground piping and other oil transfer operations | ☐Yes ☐No ☐NA | ☐Yes ☐No ☐NA |
| Comments: | | | |

| ADDITIONAL COMMENTS | |
|---|---|
| **Provision** | **Comment** |
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| PHOTO DOCUMENTATION LOG | | |
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# APPENDIX A: SPCC FIELD INSPECTION AND PLAN REVIEW TABLE

Documentation of Field Observations for Containers and Associated Requirements

*Inspectors should use this table to document observations of containers as needed.*

**Containers and Piping**

**Check containers for leaks, specifically looking for:** drip marks, discoloration of tanks, puddles containing spilled or leaked material, corrosion, cracks, and localized dead vegetation, and standards/specifications of construction.

**Check aboveground container foundation for:** cracks, discoloration, and puddles containing spilled or leaked material, settling, gaps between container and foundation, and damage caused by vegetation roots.

**Check all piping for:** droplets of stored material, discoloration, corrosion, bowing of pipe between supports, evidence of stored material seepage from valves or seals, evidence of leaks, and localized dead vegetation. For all aboveground piping, include the general condition of flange joints, valve glands and bodies, drip pans, pipe supports, bleeder and gauge valves, and other such items (Document in comments section of §112.8(d) or 112.12(d).)

**Secondary Containment (Active and Passive)**

**Check secondary containment for:** containment system (including walls and floor) ability to contain oil such that oil will not escape the containment system before cleanup occurs, proper sizing, cracks, discoloration, presence of spilled or leaked material (standing liquid), erosion, corrosion, penetrations in the containment system, and valve conditions.

**Check dike or berm systems for:** level of precipitation in dike/available capacity, operational status of drainage valves (closed), dike or berm impermeability, debris, erosion, impermeability of the earthen floor/walls of diked area, and location/status of pipes, inlets, drainage around and beneath containers, presence of oil discharges within diked areas.

**Check drainage systems for:** an accumulation of oil that may have resulted from any small discharge, including field drainage systems (such as drainage ditches or road ditches), and oil traps, sumps, or skimmers. Ensure any accumulations of oil have been promptly removed.

**Check retention and drainage ponds for:** erosion, available capacity, presence of spilled or leaked material, debris, and stressed vegetation.

**Check active measures (countermeasures) for:** amount indicated in plan is available and appropriate; deployment procedures are realistic; material is located so that they are readily available; efficacy of discharge detection; availability of personnel and training, appropriateness of measures to prevent a discharge as described in §112.1(b).

| Container ID/ General Condition[17] Aboveground or Buried Tank | Storage Capacity and Type of Oil | Type of Containment/ Drainage Control | Overfill Protection and Testing & Inspections |
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[17] Identify each tank with either an A to indicate aboveground or B for completely buried

# APPENDIX B: SPCC INSPECTION AND TESTING CHECKLIST

Required Documentation of Tests and Inspections

Records of inspections and tests required by 40 CFR part 112 signed by the appropriate supervisor or inspector must be kept by all facilities with the SPCC Plan for a period of three years. Records of inspections and tests conducted under usual and customary business practices will suffice. Documentation of the following inspections and tests should be kept with the SPCC Plan.

| | Inspection or Test | Documentation | | Not Applicable |
|---|---|---|---|---|
| | | Present | Not Present | |
| **112.7–General SPCC Requirements** | | | | |
| (d) | Integrity testing for bulk storage containers with no secondary containment system and for which an impracticability determination has been made | ☐ | ☐ | ☐ |
| (d) | Integrity and leak testing of valves and piping associated with bulk storage containers with no secondary containment system and for which an impracticability determination has been made | ☐ | ☐ | ☐ |
| (h)(3) | Inspection of lowermost drain and all outlets of tank car or tank truck prior to filling and departure from loading/unloading rack | ☐ | ☐ | ☐ |
| (i) | Evaluation of field-constructed aboveground containers for potential for brittle fracture or other catastrophic failure when the container undergoes a repair, alteration, reconstruction or change in service or has discharged oil or failed due to brittle fracture failure or other catastrophe | ☐ | ☐ | ☐ |
| k(2)(i) | Inspection or monitoring of qualified oil-filled operational equipment when the equipment meets the qualification criteria in §112.7(k)(1) and facility chooses to implement the alternative requirements in §112.7(k)(2) that include an inspection or monitoring program to detect oil-filled operational equipment failure and discharges | ☐ | ☐ | ☐ |
| **112.8/112.12–Onshore Facilities (excluding oil production facilities)** | | | | |
| (b)(1), (b)(2) | Inspection of storm water released from diked areas into facility drainage directly to a watercourse | ☐ | ☐ | ☐ |
| (c)(3) | Inspection of rainwater released directly from diked containment areas to a storm drain or open watercourse before release, open and release bypass valve under supervision, and records of drainage events | ☐ | ☐ | ☐ |
| (c)(4) | Regular leak testing of completely buried metallic storage tanks installed on or after January 10, 1974 and regulated under 40 CFR 112 | ☐ | ☐ | ☐ |
| (c)(6) | Regular integrity testing of aboveground containers and integrity testing after material repairs, including comparison records | ☐ | ☐ | ☐ |
| (c)(6), (c)(10) | Regular visual inspections of the outsides of aboveground containers, supports and foundations | ☐ | ☐ | ☐ |
| (c)(6) | Frequent inspections of diked areas for accumulations of oil | ☐ | ☐ | ☐ |
| (c)(8)(v) | Regular testing of liquid level sensing devices to ensure proper operation | ☐ | ☐ | ☐ |
| (c)(9) | Frequent observations of effluent treatment facilities to detect possible system upsets that could cause a discharge as described in §112.1(b) | ☐ | ☐ | ☐ |
| (d)(1) | Inspection of buried piping for damage when piping is exposed and additional examination of corrosion damage and corrective action, if present | ☐ | ☐ | ☐ |
| (d)(4) | Regular inspections of aboveground valves, piping and appurtenances and assessments of the general condition of flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces | ☐ | ☐ | ☐ |
| (d)(4) | Integrity and leak testing of buried piping at time of installation, modification, construction, relocation or replacement | ☐ | ☐ | ☐ |

# APPENDIX C: SPCC CONTINGENCY PLAN REVIEW CHECKLIST

40 CFR Part 109–Criteria for State, Local and Regional Oil Removal Contingency Plans

If a facility makes an impracticability determination for secondary containment in accordance with §112.7(d), it is required to provide an oil spill contingency plan following 40 CFR part 109, unless the facility has submitted a FRP under §112.20. An oil spill contingency plan may also be developed, unless the facility has submitted a FRP under §112.20 as one of the required alternatives to general secondary containment for qualified oil filled operational equipment in accordance with §112.7(k).

| | **109.5–Development and implementation criteria for State, local and regional oil removal contingency plans**[18] | **Yes** | **No** |
|---|---|---|---|
| **(a)** | Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations. | ☐ | ☐ |
| **(b)** | Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including: | ☐ | ☐ |
| (1) | The identification of critical water use areas to facilitate the reporting of and response to oil discharges. | ☐ | ☐ |
| (2) | A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered. | ☐ | ☐ |
| (3) | Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., National Contingency Plan (NCP)). | ☐ | ☐ |
| (4) | An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority. | ☐ | ☐ |
| **(c)** | Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including: | ☐ | ☐ |
| (1) | The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally. | ☐ | ☐ |
| (2) | An estimate of the equipment, materials and supplies that would be required to remove the maximum oil discharge to be anticipated. | ☐ | ☐ |
| (3) | Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge. | ☐ | ☐ |
| **(d)** | Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including: | ☐ | ☐ |
| (1) | Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel. | ☐ | ☐ |
| (2) | Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans. | ☐ | ☐ |
| (3) | A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations. | ☐ | ☐ |
| (4) | Provisions for varying degrees of response effort depending on the severity of the oil discharge. | ☐ | ☐ |
| (5) | Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses. | ☐ | ☐ |
| **(e)** | Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances. | ☐ | ☐ |

[18] The contingency plan should be consistent with all applicable state and local plans, Area Contingency Plans, and the NCP.

# U.S. ENVIRONMENTAL PROTECTION AGENCY
# SPCC FIELD INSPECTION AND PLAN REVIEW CHECKLIST

**TIER I QUALIFIED FACILITIES**

## Overview of the Checklist

This checklist is designed to assist EPA inspectors in conducting a thorough and nationally consistent inspection of a facility's compliance with the Spill Prevention, Control, and Countermeasure (SPCC) rule at 40 CFR part 112. It is a required tool to help federal inspectors (or their contractors) record observations for the site inspection and review of the SPCC Plan. While the checklist is meant to be comprehensive, the inspector should always refer to the SPCC rule in its entirety, the SPCC Regional Inspector Guidance Document, and other relevant guidance for evaluating compliance. This checklist must be completed in order for an inspection to count toward an agency measure (i.e., OEM inspection measures or GPRA). The completed checklist and supporting documentation (i.e. photo logs or additional notes) serve as the inspection report.

This checklist addresses requirements for Tier I Qualified Facilities that meet the eligibility criteria set forth in §112.3(g)(1).

| Separate and standalone checklists address the requirements for: |
|---|
| Onshore facilities including Tier II Qualified Facilities (excluding oil drilling, production and workover facilities); |
| Onshore oil drilling, production and workover facilities including Tier II Qualified Facilities as defined in §112.3(g)(2); and |
| Offshore drilling, production and workover facilities |

Tier I Qualified Facilities must meet the rule requirements in §112.6 and other applicable sections specified in §112.6. The checklist is organized according to the SPCC rule. Each item in the checklist identifies the relevant section and paragraph in 40 CFR part 112 where that requirement is stated.

- Sections 112.1 through 112.5 specify the applicability of the rule and requirements for the preparation, implementation, and amendment of SPCC Plans. For these sections, the checklist includes data fields to be completed, as well as several questions with "yes," "no" or "NA" answers.
- Section 112.6 includes requirements for Tier I qualified facilities.
- Section 112.7 includes general requirements that apply to all facilities (unless otherwise excluded).

Attachments

- Attachment A is a checklist for Sections 112.8 and 112.12. This checklist specifies requirements for spill prevention, control, and countermeasures for onshore facilities (excluding oil production facilities).
- Attachment B is a checklist that specifies requirements for spill prevention, control, and countermeasures for onshore oil production facilities (112.9 provisions) and onshore drilling and workover facilities (112.10 provisions)
- Attachment C is for recording information about containers and other locations at the facility that require secondary containment.
- Attachment D is a checklist for documenting the tests and inspections the facility operator is required to keep with the SPCC Plan.
- Attachment E is a checklist for oil spill contingency plans following 40 CFR 109. Unless a facility has submitted a Facility Response Plan (FRP) under 40 CFR 112.20, a contingency plan following 40 CFR 109 is required if a facility the owner or operator of a facility with qualified oil-filled operational equipment chooses to implement alternative requirements instead of general secondary containment requirements as provided in 40 CFR 112.7(k).
- Attachment F is for recording additional comments or notes.
- Attachment G is for recording information about photos.

The inspector needs to evaluate whether the requirements in the checklist are addressed adequately or inadequately in the SPCC Plan and whether it is implemented adequately in the field (either by field observation or record review). For the SPCC Plan and implementation in the field, if a requirement is addressed adequately, mark the "Yes" box in the appropriate column. If a requirement is not addressed adequately, mark the "No" box. If a requirement does not apply to the particular facility or the question asked is not appropriate for the facility, mark as "NA". Discrepancies or descriptions of inspector interpretation of "No" vs. "NA" may be documented in the comments box subsequent to each section. If a provision of the rule applies only to the SPCC Plan, the "Field" column is shaded.

Space is provided throughout the checklist to record comments. Additional space is available as Attachment F at the end of the checklist. Comments should remain factual and support the evaluation of compliance.

| **FACILITY INFORMATION** | | | |
|---|---|---|---|
| FACILITY NAME: | | | |
| LATITUDE: | LONGITUDE: | GPS DATUM: | |
| Section/Township/Range: | FRS#/OIL DATABASE ID: | ICIS#: | |
| ADDRESS: | | | |
| CITY: | STATE: | ZIP: | COUNTY: |
| MAILING ADDRESS (IF DIFFERENT FROM FACILITY ADDRESS – IF NOT, PRINT "SAME"): | | | |
| CITY: | STATE: | ZIP: | COUNTY: |
| TELEPHONE: | FACILITY CONTACT NAME/TITLE: | | |
| OWNER NAME: | | | |
| OWNER ADDRESS: | | | |
| CITY: | STATE: | ZIP: | COUNTY: |
| TELEPHONE: | FAX: | EMAIL: | |
| FACILITY OPERATOR NAME (IF DIFFERENT FROM OWNER – IF NOT, PRINT "SAME"): | | | |
| OPERATOR ADDRESS: | | | |
| CITY: | STATE: | ZIP: | COUNTY: |
| TELEPHONE: | OPERATOR CONTACT NAME/TITLE: | | |
| FACILITY TYPE: | | | NAICS CODE: |
| HOURS PER DAY FACILITY ATTENDED: | | TOTAL FACILITY CAPACITY: | |
| TYPE(S) OF OIL STORED: | | | |
| LOCATED IN INDIAN COUNTRY? ☐ YES ☐ NO RESERVATION NAME: | | | |

| **INSPECTION/PLAN REVIEW INFORMATION** | | |
|---|---|---|
| PLAN REVIEW DATE: | REVIEWER NAME: | |
| INSPECTION DATE: | TIME: | ACTIVITY ID NO: |
| LEAD INSPECTOR: | | |
| OTHER INSPECTOR(S): | | |

| **INSPECTION ACKNOWLEDGMENT** | |
|---|---|
| *I performed an SPCC inspection at the facility specified above.* | |
| INSPECTOR SIGNATURE: | DATE: |
| SUPERVISOR REVIEW/SIGNATURE: | DATE: |

## SPCC GENERAL APPLICABILITY—40 CFR 112.1

IS THE FACILITY REGULATED UNDER 40 CFR part 112?

The completely buried oil storage capacity is over 42,000 U.S. gallons, **OR** the aggregate aboveground oil storage capacity is over 1,320 U.S. gallons **AND** ☐ Yes ☐ No

The facility is a non-transportation-related facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States ☐ Yes ☐ No

| AFFECTED WATERWAY(S): | DISTANCE: |
|---|---|
| | |

FLOW PATH TO WATERWAY:

*Note: The following storage capacity is not considered in determining applicability of SPCC requirements:*

- *Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993; Tank trucks that return to an otherwise regulated facility that contain only residual amounts of oil (EPA Policy letter)*
- *Completely buried tanks subject to all the technical requirements of 40 CFR part 280 or a state program approved under 40 CFR part 281;*
- *Underground oil storage tanks deferred under 40 CFR part 280 that supply emergency diesel generators at a nuclear power generation facility licensed by the Nuclear Regulatory Commission (NRC) and subject to any NRC provision regarding design and quality criteria, including but not limited to CFR part 50;*
- *Any facility or part thereof used exclusively for wastewater treatment (production, recovery or recycling of oil is not considered wastewater treatment); (This does not include other oil containers located at a wastewater treatment facility, such as generator tanks or transformers)*
- *Containers smaller than 55 U.S. gallons;*
- *Permanently closed containers (as defined in §112.2);*
- *Motive power containers (as defined in §112.2);*
- *Hot-mix asphalt or any hot-mix asphalt containers;*
- *Heating oil containers used solely at a single-family residence;*
- *Pesticide application equipment and related mix containers;*
- *Any milk and milk product container and associated piping and appurtenances; and*
- *Intra-facility gathering lines subject to the regulatory requirements of 49 CFR part 192 or 195.*

Does the facility have an SPCC Plan? ☐ Yes ☐ No

## SPCC TIER I QUALIFIED FACILITY APPLICABILITY—40 CFR 112.3(g)(1),(2)

The aggregate aboveground oil storage capacity is 10,000 U.S. gallons or less **AND** ☐ Yes ☐ No

The capacity of each individual aboveground oil storage container is 5,000 U.S. gallons or less **AND** ☐ Yes ☐ No

In the three years prior to the SPCC Plan self-certification date, or since becoming subject to the rule (if the facility has been in operation for less than three years), the facility has **NOT** had:

- A single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons, **OR** ☐ Yes ☐ No
- Two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve-month period[1] ☐ Yes ☐ No

IF ***YES*** TO ALL OF THE ABOVE, THEN THE FACILITY IS CONSIDERED A TIER I QUALIFIED FACILITY.[2]

Comments:

[1] Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

[2] An owner/operator who self-certifies a Tier I SPCC Plan may not include any environmentally equivalent alternatives or secondary containment impracticability determinations in the SPCC Plan

| REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC PLAN—40 CFR 112.3 | | |
|---|---|---|
| Date facility began operations: | | |
| Date of initial SPCC Plan preparation: | Current Plan version (date/number): | |
| **112.3(a)** | **For facilities (except farms), including mobile or portable facilities:**<br>• In operation on or prior to November 10, 2011: Plan prepared and/or amended and fully implemented by **November 10, 2011**<br>• Facilities beginning operation after November 10, 2011:<br>o *Oil production facilities* - Plan prepared and fully implemented within six months after beginning operations; or<br>o *All other facilities* - Plan prepared and fully implemented before operations begin | ☐ Yes ☐ No ☐ NA<br><br>☐ Yes ☐ No ☐ NA<br>☐ Yes ☐ No ☐ NA |
| | **For farms (as defined in §112.2):**<br>• In operation on or prior to August 16, 2002: Plan maintained, amended and implemented by **May 10, 2013**<br>• Beginning operations after August 16, 2002 through May 10, 2013: Plan prepared and fully implemented by **May 10, 2013**<br>• Beginning operations after May 10, 2013: Plan prepared and fully implemented before beginning operations | ☐ Yes ☐ No ☐ NA<br>☐ Yes ☐ No ☐ NA<br>☐ Yes ☐ No ☐ NA |
| **112.3(e)(1)** | Plan is available onsite if attended at least 4 hours per day. If facility is unattended, Plan is available at the nearest field office. *(Please note nearest field office contact information in comments section below.)* | ☐ Yes ☐ No ☐ NA |
| Comments: | | |

| AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112.4 | | |
|---|---|---|
| **112.4(a),(c)** | Has the facility discharged more than 1,000 U.S. gallons of oil in a single reportable discharge or more than 42 U.S. gallons in each of two reportable discharges in any 12-month period?[3] | ☐ Yes ☐ No |
| If **YES** | • Was information submitted to the RA as required in §112.4(a)?[4] | ☐ Yes ☐ No ☐ NA |
| | • Was information submitted to the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located§112.4(c) | ☐ Yes ☐ No ☐ NA |
| | • Date(s) and volume(s) of reportable discharges(s) under this section:<br>_____ | |
| | • Were the discharges reported to the NRC[5]? | ☐ Yes ☐ No |
| **112.4(d),(e)** | Have changes required by the RA been implemented in the Plan and/or facility? | ☐ Yes ☐ No ☐ NA |
| Comments: | | |

[3] A reportable discharge is a discharge as described in §112.1(b)(see 40 CFR part 110). The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination

[4] Triggering this threshold may disqualify the facility from meeting the Qualified Facility criteria if it occurred in the three years prior to self-certification

[5] Inspector Note-Confirm any spills identified above were reported to NRC

| AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5 | | |
|---|---|---|
| **112.5(a)** | Has there been a change at the facility that materially affects the potential for a discharge described in §112.1(b)? | ☐ Yes ☐ No |
| If **YES** | • Was the Plan amended within six months of the change? | ☐ Yes ☐ No |
| | • Were amendments implemented within six months of any Plan amendment? | ☐ Yes ☐ No |
| **112.5(b)** | Review and evaluation of the Plan completed at least once every 5 years? | ☐ Yes ☐ No ☐ NA |
| | Following Plan review, was Plan amended within six months to include more effective prevention and control technology that has been field-proven to significantly reduce the likelihood of a discharge described in §112.1(b)? | ☐ Yes ☐ No ☐ NA |
| | Amendments implemented within six months of any Plan amendment? | ☐ Yes ☐ No ☐ NA |
| | Five year Plan review and evaluation documented? | ☐ Yes ☐ No ☐ NA |
| **112.5(c)** | Professional Engineer certification of any technical Plan amendments in accordance with all applicable requirements of §112.3(d) *[Except for self-certified Plans]* | ☐ Yes ☐ No ☐ NA |

| Name: | License No.: | State: | Date of certification: |
|---|---|---|---|
| | | | |

Reason for amendment:

| TIER I QUALIFIED FACILITY PLAN REQUIREMENTS —40 CFR 112.6(a) | | |
|---|---|---|
| **112.6(a)(1)** | **Plan Certification:** Plan prepared to comply with the requirements of §112.6(a)(3) using the Appendix G template | ☐ Yes ☐ No ☐ NA |
| (i) | He or she is familiar with the requirements of 40 CFR part 112 | ☐ Yes ☐ No ☐ NA |
| (ii) | He or she has visited and examined the facility[6] | ☐ Yes ☐ No ☐ NA |
| (iii) | The Plan has been prepared in accordance with accepted and sound industry practices and standards | ☐ Yes ☐ No ☐ NA |
| (iv) | Procedures for required inspections and testing have been established | ☐ Yes ☐ No ☐ NA |
| (v) | He or she will fully implement the Plan | ☐ Yes ☐ No ☐ NA |
| (vi) | The facility meets the qualification criteria in §112.3(g)(1) | ☐ Yes ☐ No ☐ NA |
| (vii) | The Plan does not deviate from any requirements 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 | ☐ Yes ☐ No ☐ NA |
| (viii) | The Plan and individual(s) responsible for implementing the Plan have the full approval of management and the facility owner or operator has committed the necessary resources to fully implement the Plan. | ☐ Yes ☐ No ☐ NA |
| **112.6(a)(2)** | **Technical Amendments:** The owner/operator self-certified the Plan's technical amendments for a change in facility design, construction, operation, or maintenance that affected potential for a §112.1(b) discharge | ☐ Yes ☐ No ☐ NA |
| If **YES** | • Certification of technical amendments is in accordance with the self-certification provisions of §112.6(a)(1). | ☐ Yes ☐ No ☐ NA |
| | An individual oil storage container capacity exceeds 5,000 U.S. gallons or the aggregate aboveground oil storage capacity increased to more than 10,000 U.S. gallons as a result of the change | ☐ Yes ☐ No ☐ NA |
| If **YES** | *The facility no longer meets the Tier I qualifying criteria in §112.3(g)(1) because an individual oil storage container capacity exceeds 5,000 U.S. gallons or the facility aboveground storage capacity exceeds 10,000 U.S. gallons* | |
| | *The following has been or will be completed within six months following the amendment:* | |
| (i) | • Plan prepared and implemented in accordance with the requirements for a Tier II Qualified Facility (§112.6(b)) if the facility meets the eligibility criteria **OR** | ☐ Yes ☐ No ☐ NA |
| (ii) | • Plan prepared and implemented in accordance with the general Plan requirements in §112.7 and applicable requirements in subparts B and C and certified by a PE as required under §112.3(d) | ☐ Yes ☐ No ☐ NA |

[6] Note that only the person certifying the Plan can make the site visit

| | | |
|---|---|---|
| **112.6(a)(3)**(i) | Plan includes a prediction of the direction and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure if there is a reasonable potential for equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of discharge) | ☐ Yes ☐ No ☐ NA |
| (ii) | Bulk storage container installations (except mobile refuelers and other non-transportation-related tank trucks), including mobile or portable oil storage containers, are constructed to provide secondary containment for the entire capacity of the largest single container plus additional capacity to contain precipitation, and | ☐ Yes ☐ No ☐ NA |
| | Mobile or portable oil storage containers positioned or located to prevent a §112.1(b) discharge | ☐ Yes ☐ No ☐ NA |
| (iii) | Plan describes a system or documented procedure to prevent overfills for each container and is regularly tested to ensure proper operation or efficacy | ☐ Yes ☐ No ☐ NA |

Comments:

| **GENERAL SPCC REQUIREMENTS—40 CFR 112.7** | | **PLAN** | **FIELD** |
|---|---|---|---|
| Management approval at a level of authority to commit the necessary resources to fully implement the Plan[7] | | ☐ Yes ☐ No | |
| Plan follows sequence of the rule or is an equivalent Plan meeting all applicable rule requirements and includes a cross-reference of provisions | | ☐ Yes ☐ No ☐ NA | |
| If Plan calls for facilities, procedures, methods, or equipment not yet fully operational, details of their installation and start-up are discussed *(Note: Relevant for inspection evaluation and testing baselines.)* | | ☐ Yes ☐ No ☐ NA | |
| **112.7(a)(3)** | Plan addresses each of the following: | | |
| (i) | For each fixed container, type of oil and storage capacity (see Attachment C of this checklist). For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities | ☐ Yes ☐ No | ☐ Yes ☐ No |
| (iv) | Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources) | ☐ Yes ☐ No | ☐ Yes ☐ No |
| (vi) | Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with an agreement for response, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b) | ☐ Yes ☐ No | |
| **112.7(a)(4)** | Plan includes information and procedures that enable a person reporting an oil discharge as described in §112.1(b) to relate information on the:<br>• Exact address or location and phone number of the facility;<br>• Date and time of the discharge;<br>• Type of material discharged;<br>• Estimates of the total quantity discharged;<br>• Estimates of the quantity discharged as described in §112.1(b);<br>• Source of the discharge;<br>• A description of all affected media;<br>• Cause of the discharge;<br>• Damages or injuries caused by the discharge;<br>• Actions being used to stop, remove, and mitigate the effects of the discharge;<br>• Whether an evacuation may be needed;<br>• Names of individuals and/or organizations who have also been contacted | ☐ Yes ☐ No ☐ NA | |
| **112.7(a)(5)** | Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency | ☐ Yes ☐ No ☐ NA | |

Comments:

[7] May be part of the Plan or demonstrated elsewhere.

| | | PLAN | FIELD |
|---|---|---|---|
| **112.7(c)** | Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in §112.1(b), **except as provided in §112.7(k) of this section for certain qualified operational equipment and §112.9(d)(3) for certain flowlines and intra-facility gathering lines at an oil production facility**. The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method, design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. See Attachment C of this checklist.<br>**For onshore facilities**, one of the following or its equivalent:<br>• Dikes, berms, or retaining walls sufficiently impervious to contain oil,<br>• Curbing or drip pans,<br>• Sumps and collection systems,<br>• Culverting, gutters or other drainage systems,<br>• Weirs, booms or other barriers,<br>• Spill diversion ponds,<br>• Retention ponds, or<br>• Sorbent materials | | |
| | Identify which of the following are present at the facility and if appropriate containment and/or diversionary structures or equipment are provided as described above: | | |
| | ☐ Bulk storage containers | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | ☐ Mobile/portable containers | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | ☐ Oil-filled operational equipment (as defined in 112.2) | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | ☐ Other oil-filled equipment (i.e., manufacturing equipment) | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | ☐ Piping and related appurtenances | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | ☐ Mobile refuelers or non-transportation-related tank cars | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | ☐ Transfer areas, equipment and activities | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | ☐ Identify any other equipment or activities that are not listed above: | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| **112.7(e)** | Inspections and tests conducted in accordance with written procedures | ☐ Yes ☐ No | ☐ Yes ☐ No |
| | Record of inspections or tests signed by supervisor or inspector | ☐ Yes ☐ No | ☐ Yes ☐ No |
| | Kept with Plan for at least 3 years (see Attachment D of this checklist)[8] | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **112.7(f)** | Personnel, training, and oil discharge prevention procedures | | |
| (1) | Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of SPCC Plan | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (2) | Person designated as accountable for discharge prevention at the facility and reports to facility management | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (3) | Discharge prevention briefings conducted at least once a year for oil handling personnel to assure adequate understanding of the Plan. Briefings highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |

Comments:

[8] Records of inspections and tests kept under usual and customary business practices will suffice

| | | PLAN | FIELD |
|---|---|---|---|
| **112.7(g)** | Plan describes how to:<br>• Secure and control access to the oil handling, processing and storage areas;<br>• Secure master flow and drain valves;<br>• Prevent unauthorized access to starter controls on oil pumps;<br>• Secure out-of-service and loading/unloading connections of oil pipelines; and<br>• Address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges | ☐ Yes ☐ No ☐ NA<br>*For Oil Production Facilities:*<br>*Select **NA*** | ☐ Yes ☐ No ☐ NA |
| **112.7(k)** | Qualified oil-filled operational equipment is present at the facility[9]<br>*Oil-filled operational equipment means* equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems ( e.g. , those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device. | ☐ Yes ☐ No | |
| **If YES** | Check which apply:<br>Secondary Containment provided in accordance with 112.7(c) ☐<br>Alternative measure described below (confirm eligibility) ☐ | | |
| **112.7(k)** | Qualified Oil-Filled Operational Equipment<br>• Has a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within the three years prior to Plan certification date? | | ☐ Yes ☐ No ☐ NA |
| | • Have two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?[10] | | ☐ Yes ☐ No ☐ NA |
| | If **YES** for either, secondary containment in accordance with §112.7(c) is required | | |
| | • Facility procedure for inspections or monitoring program to detect equipment failure and/or a discharge is established and documented | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | ***Does not apply if the facility has submitted a FRP under §112.20:***<br>• Contingency plan following 40 CFR part 109 (see Attachment E of this checklist) is provided in Plan **AND** | ☐ Yes ☐ No ☐ NA | |
| | • Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in Plan | ☐ Yes ☐ No ☐ NA | |

Comments:

**Inspector Note-** Complete, as applicable, either Attachment A or B which include additional requirements based on the type of facility.

[9] This provision does not apply to oil-filled manufacturing equipment (flow-through process)

[10] Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

| **ATTACHMENT A** ☐ NA<br>**ONSHORE FACILITIES (EXCLUDING PRODUCTION) 40 CFR 112.8/112.12** | | **PLAN** | **FIELD** |
|---|---|---|---|
| **112.8(b)/ 112.12(b) Facility Drainage** | | | |
| Diked Areas (1) | Drainage from diked storage areas is:<br>• Restrained by valves, except where facility systems are designed to control such discharge, **OR**<br>• Manually activated pumps or ejectors are used and the condition of the accumulation is inspected prior to draining dike to ensure no oil will be discharged | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| Comments: | | | |
| **112.8(c)/112.12(c) Bulk Storage Containers** ☐ NA<br>*Bulk storage container* means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.<br>*If bulk storage containers are not present, mark this section Not Applicable (NA). If present, complete this section and Attachment C of this checklist.* | | | |
| (1) | Containers materials and construction are compatible with material stored and conditions of storage such as pressure and temperature | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (3) | Is there drainage of uncontaminated rainwater from diked areas into a storm drain or open watercourse? | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| If **YES** | Bypass valve normally sealed closed | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | • Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b) | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | • Bypass valve opened and resealed under responsible supervision | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | • Adequate records of drainage are kept; for example, records required under permits issued in accordance with 40 CFR §§122.41(j)(2) and (m)(3) | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (4) | For completely buried metallic tanks installed on or after January 10, 1974 (if not exempt from SPCC regulation because subject to all of the technical requirements of 40 CFR part 280 or 281): | | |
| | • Provide corrosion protection with coatings or cathodic protection compatible with local soil conditions | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | • Regular leak testing conducted | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (5) | The buried section of partially buried or bunkered metallic tanks protected from corrosion with coatings or cathodic protection compatible with local soil conditions | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| Comments: | | | |

| ATTACHMENT A | | PLAN | FIELD |
|---|---|---|---|
| (6) | Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. Techniques include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other system of non-destructive testing | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | Appropriate qualifications for personnel performing tests and inspections are identified in the Plan and have been assessed in accordance with industry standards | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | • The frequency and type of testing and inspections are documented, are in accordance with industry standards and take into account the container size, configuration and design | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | • Comparison records of aboveground container integrity testing are maintained | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | • Container supports and foundations regularly inspected | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | • Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | • Records of all inspections and tests maintained[11] | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| Integrity Testing Standard identified in the Plan: | | | |
| **112.12 (c)(6)(ii)** *(Applies to AFVO Facilities only)* | Conduct formal visual inspection on a regular schedule for bulk storage containers that meet all of the following conditions:<br>• Subject to 21 CFR part 110;<br>• Elevated;<br>• Constructed of austenitic stainless steel;<br>• Have no external insulation; and<br>• Shop-fabricated. | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | You must determine and document in the Plan the appropriate qualifications for personnel performing tests and inspections.[11] | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (10) | Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| **112.8(d)/112.12(d)Facility transfer operations, pumping, and facility process** | | | |
| (4) | Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly to assess their general condition | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | Integrity and leak testing conducted on buried piping at time of installation, modification, construction, relocation, or replacement | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| Comments: | | | |

[11] Records of inspections and tests kept under usual and customary business practices will suffice

| ATTACHMENT B ☐ NA<br>ONSHORE OIL PRODUCTION FACILITIES—40 CFR 112.9 | | PLAN | FIELD |
|---|---|---|---|
| **(Drilling and workover facilities are excluded from the requirements of §112.9)**<br>*Production facility* means all structures (including but not limited to wells, platforms, or storage facilities), piping (including but not limited to flowlines or intra-facility gathering lines), or equipment (including but not limited to workover equipment, separation equipment, or auxiliary non-transportation-related equipment) used in the production, extraction, recovery, lifting, stabilization, separation or treating of oil (including condensate), or associated storage or measurement, and is located in an oil or gas field, at a facility. This definition governs whether such structures, piping, or equipment are subject to a specific section of this part. | | | |
| **112.9(b) Oil Production Facility Drainage** | | | |
| (1) | At tank batteries, separation and treating areas where there is a reasonable possibility of a discharge as described in §112.1(b), drains for dikes or equivalent measures are closed and sealed except when draining uncontaminated rainwater. Accumulated oil on the rainwater is removed and then returned to storage or disposed of in accordance with legally approved methods | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | Prior to drainage, diked area inspected and action taken as provided below: | | |
| | • 112.8(c)(3)(ii) - Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b) | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | • 112.8(c)(3)(iii) - Bypass valve opened and resealed under responsible supervision | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | • 112.8(c)(3)(iv) - Adequate records of drainage are kept; for example, records required under permits issued in accordance with §122.41(j)(2) and (m)(3) | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (2) | Field drainage systems (e.g., drainage ditches or road ditches) and oil traps, sumps, or skimmers inspected at regularly scheduled intervals for oil, and accumulations of oil promptly removed | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| **112.9(c) Oil Production Facility Bulk Storage Containers**<br>*Bulk storage container* means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container. | | | |
| (1) | Containers materials and construction are compatible with material stored and conditions of storage such as pressure and temperature | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (2) | Except as allowed for flow-through process vessels in §112.9(c)(5) and produced water containers in §112.9(c)(6), secondary containment provided for all tank battery, separation and treating facilities sized to hold the capacity of largest single container and sufficient freeboard for precipitation. | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | Drainage from undiked area safely confined in a catchment basin or holding pond. | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (3) | Except as allowed for flow-through process vessels in §112.9(c)(5) and produced water containers in §112.9(c)(6), periodically and upon a regular schedule, visually inspect containers for deterioration and maintenance needs, including foundation and supports of each container on or above the surface of the ground | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (4) | New and old tank batteries engineered/updated in accordance with good engineering practices to prevent discharges including at least one of the following:<br>• Adequate container capacity to prevent overfill if a pumper/gauger is delayed in making regularly scheduled rounds;<br>• Overflow equalizing lines between containers so that a full container can overflow to an adjacent container;<br>• Adequate vacuum protection to prevent container collapse; or<br>• High level sensors to generate and transmit an alarm to the computer where the facility is subject to a computer production control system | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| Comments: | | | |

| ATTACHMENT B | | PLAN | FIELD |
|---|---|---|---|
| (5) | **Flow-through Process Vessels.** Alternate requirements in lieu of sized secondary containment required in (c)(2) and requirements in (c)(3) above for facilities with flow-through process vessels: | | |
| (i) | Flow-through process vessels and associated components (e.g. dump valves) are periodically and on a regular schedule visually inspected and/or tested for leaks, corrosion, or other conditions that could lead to a discharge as described in §112.1(b) | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (ii) | Corrective actions or repairs have been made to flow-through process vessels and any associated components as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (iii) | Oil removed or other actions initiated to promptly stabilize and remediate any accumulation of oil discharges associated with the produced water container | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (iv) | All flow-through process vessels comply with §§112.9(c)(2) and (c)(3) within six months of any flow-through process vessel discharge of more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b) or discharges of more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b) within any twelve month period.[12] | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| **112.9(d) Facility transfer operations, pumping, and facility process** | | | |
| (1) | All aboveground valves and piping associated with transfer operations are inspected periodically and upon a regular schedule to determine their general condition. Include the general condition of flange joints, valve glands and bodies, drip pans, pipe supports, pumping well polish rod stuffing boxes, bleeder and gauge valves, and other such items | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (3) | If flowlines and intra-facility gathering lines are not provided with secondary containment in accordance with §112.7(c) and the facility is not required to submit an FRP under §112.20, then the SPCC Plan includes: | | |
| (i) | • An oil spill contingency plan following the provisions of 40 CFR part 109[13] | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (ii) | • A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that might be harmful | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| Comments: | | | |

[12] Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

[13] Note that the implementation of a 40 CFR part 109 plan does not require a PE impracticability determination for this specific requirement

| ATTACHMENT B | | PLAN | FIELD |
|---|---|---|---|
| (4) | A flowline/intra-facility gathering line maintenance program to prevent discharges is prepared and implemented and includes the following procedures: | | |
| (i) | Flowlines and intra-facility gathering lines and associated valves and equipment are compatible with the type of production fluids, their potential corrosivity, volume, and pressure, and other conditions expected in the operational environment | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (ii) | Flowlines and intra-facility gathering lines and associated appurtenances are visually inspected and/or tested on a periodic and regular schedule for leaks, oil discharges, corrosion, or other conditions that could lead to a discharge as described in §112.1(b). | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | If flowlines and intra-facility gathering lines are not provided with secondary containment in accordance with §112.7(c), the frequency and type of testing allows for the implementation of a contingency plan as described under 40 CFR 109 or an FRP submitted under §112.20 | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (iii) | Repairs or other corrective actions are made to any flowlines and intra-facility gathering lines and associated appurtenances as indicated by regularly scheduled visual inspections, tests, or evidence of a discharge | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| (iv) | Oil removed or other actions initiated to promptly stabilize and remediate any accumulation of oil discharges associated with the produced water containers | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| **ATTACHMENT B** ☐ NA<br>**ONSHORE OIL DRILLING AND WORKOVER FACILITIES—40 CFR 112.10** | | **PLAN** | **FIELD** |
| **112.10(b)** | Mobile drilling or workover equipment is positioned or located to prevent a discharge as described in §112.1(b) | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| **112.10(c)** | Catchment basins or diversion structures are provided to intercept and contain discharges of fuel, crude oil, or oily drilling fluids | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| **112.10(d)** | Blowout prevention (BOP) assembly and well control system installed before drilling below any casing string or during workover operations | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |
| | BOP assembly and well control system is capable of controlling any well-head pressure that may be encountered while on the well | ☐ Yes ☐ No ☐ NA | ☐ Yes ☐ No ☐ NA |

Comments:

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# ATTACHMENT C: SPCC FIELD INSPECTION AND PLAN REVIEW TABLE

**Documentation of Field Observations for Containers and Associated Requirements**

*Inspectors should use this table to document observations of containers as needed.*

**Containers and Piping**

**Check containers for leaks, specifically looking for:** drip marks, discoloration of tanks, puddles containing spilled or leaked material, corrosion, cracks, and localized dead vegetation, and standards/specifications of construction.

**Check aboveground container foundation for:** cracks, discoloration, and puddles containing spilled or leaked material, settling, gaps between container and foundation, and damage caused by vegetation roots.

**Check all piping for:** droplets of stored material, discoloration, corrosion, bowing of pipe between supports, evidence of stored material seepage from valves or seals, evidence of leaks, and localized dead vegetation. For all aboveground piping, include the general condition of flange joints, valve glands and bodies, drip pans, pipe supports, bleeder and gauge valves, and other such items (Document in comments section of §112.8(d) or 112.12(d).)

**Secondary Containment (Active and Passive)**

**Check secondary containment for:** containment system (including walls and floor) ability to contain oil such that oil will not escape the containment system before cleanup occurs, proper sizing, cracks, discoloration, presence of spilled or leaked material (standing liquid), erosion, corrosion, penetrations in the containment system, and valve conditions.

**Check dike or berm systems for:** level of precipitation in dike/available capacity, operational status of drainage valves (closed), dike or berm impermeability, debris, erosion, impermeability of the earthen floor/walls of diked area, and location/status of pipes, inlets, drainage around and beneath containers, presence of oil discharges within diked areas.

**Check drainage systems for:** an accumulation of oil that may have resulted from any small discharge, including field drainage systems (such as drainage ditches or road ditches), and oil traps, sumps, or skimmers. Ensure any accumulations of oil have been promptly removed.

**Check retention and drainage ponds for:** erosion, available capacity, presence of spilled or leaked material, debris, and stressed vegetation.

**Check active measures (countermeasures) for:** amount indicated in plan is available and appropriate; deployment procedures are realistic; material is located so that they are readily available; efficacy of discharge detection; availability of personnel and training, appropriateness of measures to prevent a discharge as described in §112.1(b). *Note that appropriate evaluation and consideration must be given to the any use of active measures at an unmanned production facility.*

| Container ID/ General Condition[14] Aboveground or Buried Tank | Storage Capacity and Type of Oil | Type of Containment/ Drainage Control | Overfill Protection and Testing & Inspections |
|---|---|---|---|
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[14] Identify each tank with either an A to indicate aboveground or B for completely buried

# ATTACHMENT C: SPCC FIELD INSPECTION AND PLAN REVIEW TABLE (CONT.)

**Documentation of Field Observations for Containers and Associated Requirements**

| Container ID/ General Condition[15] Aboveground or Buried Tank | Storage Capacity and Type of Oil | Type of Containment/ Drainage Control | Overfill Protection and Testing & Inspections |
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[15] Identify each tank with either an A to indicate aboveground or B for completely buried

# ATTACHMENT D: SPCC INSPECTION AND TESTING CHECKLIST

**Required Documentation of Tests and Inspections**

Records of inspections and tests required by 40 CFR part 112 signed by the appropriate supervisor or inspector must be kept by all facilities with the SPCC Plan for a period of three years. Records of inspections and tests conducted under usual and customary business practices will suffice. Documentation of the following inspections and tests should be kept with the SPCC Plan.

| | Inspection or Test | Documentation | | Not Applicable |
|---|---|---|---|---|
| | | Present | Not Present | |
| **112.6—Tier I Qualified Facilities** | | | | |
| (a)(3)(iii) | Regular testing of system or documented procedures used instead of liquid level sensing devices specified in §§112.8(c)(8) and 112.12(c)(8) to prevent container overfills | ☐ | ☐ | ☐ |
| **112.7–General SPCC Requirements** | | | | |
| k(2)(i) | Inspection or monitoring of qualified oil-filled operational equipment when the equipment meets the qualification criteria in §112.7(k)(1) and facility owner/operator chooses to implement the alternative requirements in §112.7(k)(2) that include an inspection or monitoring program to detect oil-filled operational equipment failure and discharges | ☐ | ☐ | ☐ |
| **112.8/112.12–Onshore Facilities (excluding oil production facilities)** | | | | ☐ NA |
| (b)(1), (b)(2) | Inspection of storm water released from diked areas into facility drainage directly to a watercourse | ☐ | ☐ | ☐ |
| (c)(3) | Inspection of rainwater released directly from diked containment areas to a storm drain or open watercourse before release, open and release bypass valve under supervision, and records of drainage events | ☐ | ☐ | ☐ |
| (c)(4) | Regular leak testing of completely buried metallic storage tanks installed on or after January 10, 1974 and regulated under 40 CFR 112 | ☐ | ☐ | ☐ |
| (c)(6) | Regular integrity testing of aboveground containers and integrity testing after material repairs, including comparison records | ☐ | ☐ | ☐ |
| (c)(6), (c)(10) | Regular visual inspections of the outsides of aboveground containers, supports and foundations | ☐ | ☐ | ☐ |
| (c)(6) | Frequent inspections of diked areas for accumulations of oil | ☐ | ☐ | ☐ |
| (d)(4) | Regular inspections of aboveground valves, piping and appurtenances and assessments of the general condition of flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces | ☐ | ☐ | ☐ |
| (d)(4) | Integrity and leak testing of buried piping at time of installation, modification, construction, relocation or replacement | ☐ | ☐ | ☐ |
| **112.9–Onshore Oil Production Facilities (excluding drilling and workover facilities)** | | | | ☐ NA |
| (b)(1) | Rainwater released directly from diked containment areas inspected following §§112.8(c)(3)(ii), (iii) and (iv), including records of drainage kept | ☐ | ☐ | ☐ |
| (b)(2) | Field drainage systems, oil traps, sumps, and skimmers inspected regularly for oil, and accumulations of oil promptly removed | ☐ | ☐ | ☐ |
| (c)(3) | Containers, foundations and supports inspected visually for deterioration and maintenance needs | ☐ | ☐ | ☐ |
| (c)(5)(i) | In lieu of having sized secondary containment, flow-through process vessels and associated components visually inspected and/or tested periodically and on a regular schedule for conditions that could result in a discharge as described in §112.1(b) | ☐ | ☐ | ☐ |
| (d)(1) | All aboveground valves and piping associated with transfers are regularly inspected | ☐ | ☐ | ☐ |
| (d)(4)(ii) | For flowlines and intra-facility gathering lines without secondary containment, in accordance with §112.7(c), lines are visually inspected and/or tested periodically and on a regular schedule to allow implementing the part 109 contingency plan or the FRP submitted under §112.20 | ☐ | ☐ | ☐ |

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# ATTACHMENT E: SPCC CONTINGENCY PLAN REVIEW CHECKLIST

☐ NA

**40 CFR Part 109–Criteria for State, Local and Regional Oil Removal Contingency Plans**

If SPCC Plan includes an impracticability determination for secondary containment in accordance with §112.7(d), the facility owner/operator is required to provide an oil spill contingency plan following 40 CFR part 109, unless he or she has submitted a FRP under §112.20. An oil spill contingency plan may also be developed, unless the facility owner/operator has submitted a FRP under §112.20 as one of the required alternatives to general secondary containment for qualified oil filled operational equipment in accordance with §112.7(k).

| | **109.5–Development and implementation criteria for State, local and regional oil removal contingency plans[16]** | **Yes** | **No** |
|---|---|---|---|
| **(a)** | Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations. | ☐ | ☐ |
| **(b)** | Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including: | ☐ | ☐ |
| (1) | The identification of critical water use areas to facilitate the reporting of and response to oil discharges. | ☐ | ☐ |
| (2) | A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered. | ☐ | ☐ |
| (3) | Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., National Contingency Plan (NCP)). | ☐ | ☐ |
| (4) | An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority. | ☐ | ☐ |
| **(c)** | Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including: | ☐ | ☐ |
| (1) | The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally. | ☐ | ☐ |
| (2) | An estimate of the equipment, materials and supplies that would be required to remove the maximum oil discharge to be anticipated. | ☐ | ☐ |
| (3) | Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge. | ☐ | ☐ |
| **(d)** | Provisions for well-defined and specific actions to be taken after discovery and notification of an oil discharge including: | ☐ | ☐ |
| (1) | Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel. | ☐ | ☐ |
| (2) | Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans. | ☐ | ☐ |
| (3) | A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations. | ☐ | ☐ |
| (4) | Provisions for varying degrees of response effort depending on the severity of the oil discharge. | ☐ | ☐ |
| (5) | Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses. | ☐ | ☐ |
| **(e)** | Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances. | ☐ | ☐ |

[16] The contingency plan should be consistent with all applicable state and local plans, Area Contingency Plans, and the NCP.

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# ATTACHMENT F: ADDITIONAL COMMENTS

# ATTACHMENT F: ADDITIONAL COMMENTS (CONT.)

# ATTACHMENT G: PHOTO DOCUMENTATION NOTES

| Photo# | Photographer Name | Time of Photo Taken | Compass Direction | Description |
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# ATTACHMENT G: PHOTO DOCUMENTATION NOTES (CONT.)

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