

# APSA Violations

Current run (last updated Feb 26, 2019 10:12pm)

17

Polls

137

Participants

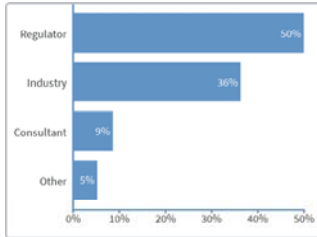
77

Average responses



Average engagement

## What role do you have in APSA/SPCC?



Response options

- Regulator
- Industry
- Consultant
- Other

Response options	Count	Percentage
Regulator	58	50%
Industry	42	36%
Consultant	10	9%
Other	6	5%

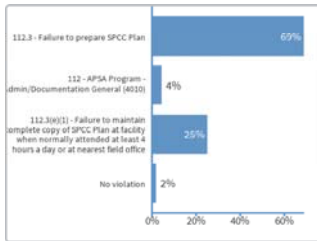


Engagement

116

Responses

## What citation reference would you use for this?



Response options

- 112.3 - Failure to prepare SPCC Plan
- 112 - APSA Program - Admin/Documentation General (4010)
- 112.3(e)(1) - Failure to maintain complete copy of SPCC Plan at facility when normally attended at least 4 hours a day or at nearest field office
- No violation

Response options	Count	Percentage
112.3 - Failure to prepare SPCC Plan	80	69%
112 - APSA Program - Admin/Documentation General (4010)	5	4%
112.3(e)(1) - Failure to maintain complete copy of SPCC Plan at facility when normally attended at least 4 hours a day or at nearest field office	29	25%
No violation	2	2%

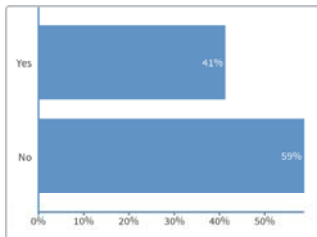


Engagement

116

Responses

## Is an unstaffed facility required to have an SPCC Plan onsite?



Response options

- Yes
- No

Response options	Count	Percentage
Yes	19	41%
No	27	59%

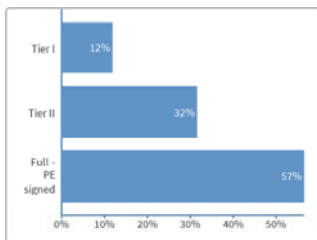


Engagement

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Responses

## What type of SPCC Plan is required? (facility has no discharges)



Response options

- Tier I
- Tier II
- Full - PE signed

Response options	Count	Percentage
Tier I	11	12%
Tier II	29	32%
Full - PE signed	52	57%

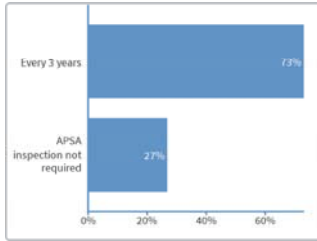


Engagement

92

Responses

## How often is this facility required to receive an APSA inspection in accordance with HSC 25270.5(a)?

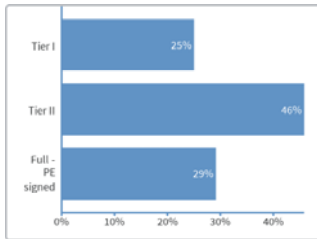


Response options	Count	Percentage
Every 3 years	71	73%
APSA inspection not required	26	27%



**97**  
Responses

## What SPCC Plan is required for this facility?

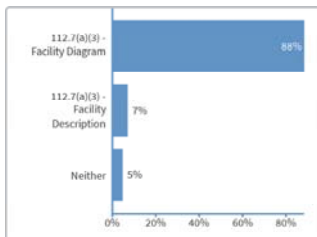


Response options	Count	Percentage
Tier I	24	25%
Tier II	44	46%
Full - PE signed	28	29%



**96**  
Responses

## Anything missing in either section?

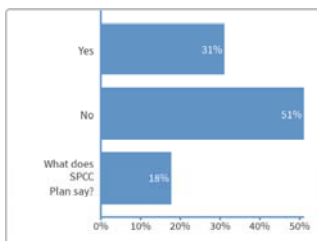


Response options	Count	Percentage
112.7(a)(3) - Facility Diagram	38	88%
112.7(a)(3) - Facility Description	3	7%
Neither	2	5%



**43**  
Responses

## Training and briefings have to be documented?

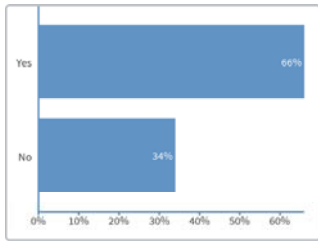


Response options	Count	Percentage
Yes	14	31%
No	23	51%
What does SPCC Plan say?	8	18%



**45**  
Responses

### Can inspections meet requirements for integrity testing?



Response options

**Yes**

**No**

Response options	Count	Percentage
<b>Yes</b>	66	66%
<b>No</b>	34	34%

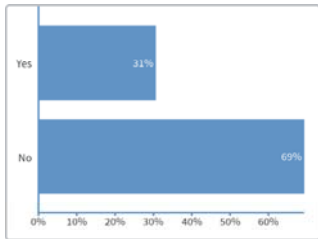


Engagement

100

Responses

### Is hazardous waste tank daily inspection sufficient for STI SP001 monthly inspection for this facility?



Response options

**Yes**

**No**

Response options	Count	Percentage
<b>Yes</b>	27	31%
<b>No</b>	61	69%

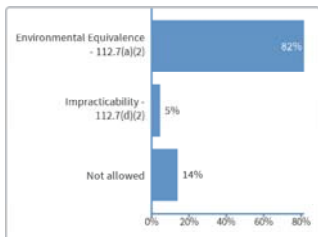


Engagement

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Responses

### SPCC Plan is deviating from an industry standard - which is applicable?



Response options

**Environmental Equivalence - 112.7(a)(2)**

**Impracticability - 112.7(d)(2)**

**Not allowed**

Response options	Count	Percentage
<b>Environmental Equivalence - 112.7(a)(2)</b>	71	82%
<b>Impracticability - 112.7(d)(2)</b>	4	5%
<b>Not allowed</b>	12	14%

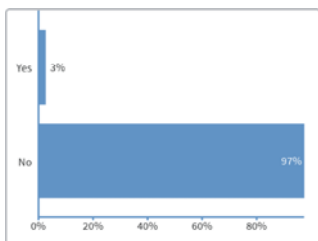


Engagement

87

Responses

### Is this an appropriate citation of environmental equivalence?



Response options

**Yes**

**No**

Response options	Count	Percentage
<b>Yes</b>	2	3%
<b>No</b>	75	97%

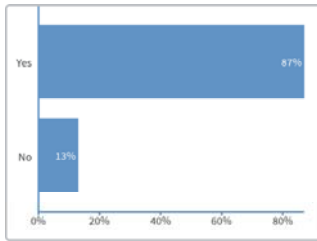


Engagement

77

Responses

### Is this an appropriate citation of environmental equivalence?

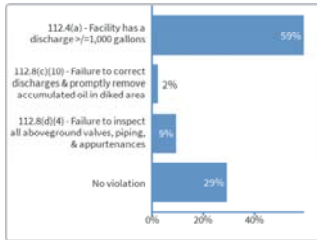


Response options	Count	Percentage
Yes	67	87%
No	10	13%

56%  
Engagement

77  
Responses

### Which citation reference would you use for this (citing HSC 25270.4.5(a))?

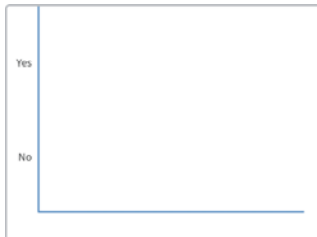


Response options	Count	Percentage
112.4(a) - Facility has a discharge >=1,000 gallons	51	59%
112.8(c)(10) - Failure to correct discharges & promptly remove accumulated oil in diked area	2	2%
112.8(d)(4) - Failure to inspect all aboveground valves, piping, & appurtenances	8	9%
No violation	25	29%

63%  
Engagement

86  
Responses

### Flange joint is now repaired. Is integrity & leak testing of repaired aboveground piping required?

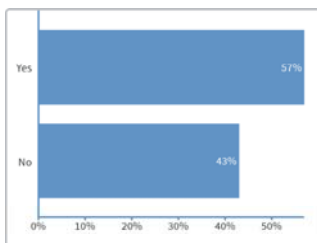


Response options	Count	Percentage
Yes	0	0%
No	0	0%

0%  
Engagement

0  
Responses

### Are there APSA reporting requirements based on this release of petroleum?

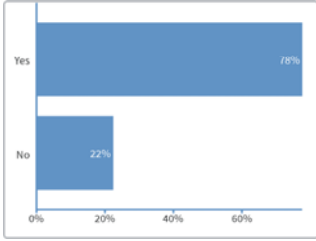


Response options	Count	Percentage
Yes	41	57%
No	31	43%

53%  
Engagement

72  
Responses

### Flange joint is now repaired. Is integrity & leak testing of the repaired aboveground piping required?



Response options

Yes

No

Count

52

15

Percentage

78%

22%



Engagement

67

Responses