

The Tier I Facility SPCC Plan: Key Concepts, Benefits, and Challenges



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Presentation Outline

- SPCC Qualified Facility History
- Who's Eligible and Why?
- Key Differences, Benefits, and Challenges
- Resources and References



Assumptions

- Audience familiar with key spill prevention, control, and countermeasure (SPCC) definitions and basic requirements of Parts 112.7 (applicable to all facilities), 112.8 (bulk container requirements for onshore non-oil production facilities), and 112.12 (bulk container requirements for animal, fish, and vegetable oils)
- Focus on onshore/non-oil production facilities*

*In 2008, U.S. EPA believed that about 13% of oil production facilities would qualify as Tier I

Qualified Facility Concept History

- U.S. EPA received extensive industry comment regarding regulatory burden and costs of SPCC compliance
- **2002** Rule amendments – relaxed many requirements, but did not address smaller, lower-risk facilities
- **2006** Rule amendments – created a facility self-certification option (essentially today's) with the Tier II qualified facility concept
- **2008** Rule Amendments – created the current two-tier qualified facility concept to further reduce burden on the smallest, lowest-risk facilities

Tier I Qualified Facility (QF) Criteria

- Definition of Tier I/Tier II qualified facilities added to Part 112.3(g) in 2008:
 - Total oil storage capacity $\leq 10,000$ gallons
 - No individual container $> 5,000$ gallons
 - No single discharge exceeding 1,000 gallons in past 3 years (or since becoming subject)
 - No two discharges exceeding 42 gallons within any 12-month period in past 3 years

Tier I QF Criteria

Q: Where did the 5,000-gallon container size come from?

A: U.S. EPA concluded that there was “industry consensus” (for example, in the STI SP001 Standard) that containers of this size did not have to be professionally inspected and were thus consistent with lower throughput, less complicated, and lower risk facilities

Discharge History Criteria

*When determining spill history, the U.S. gallon amount specified in the criterion (either 1,000 or 42) refers to the amount of oil that **actually reaches navigable waters or adjoining shorelines and not the total amount of oil spilled.** The **entire volume of the discharge is considered to be oil** for the purpose of these reporting requirements.*

(SPCC Guidance For Regional Inspectors, p.1-19)

Note: Spill history for QF is a one-time evaluation – not revisited even after a spill occurs or as part of the 5-year Plan review (In contrast to the 10,000/5,000-gallon criteria)

Tier I Qualified Facilities

What do QFs get under 112.6?

- Elimination of Plan certification by a Professional Engineer (P.E.)
- Exemption or relaxation of some 112.7 and 112.8 requirements
- Can use simplified Template Plan or “equivalent”
- Do not need to develop a Facility Diagram

What do QFs give up under 112.6?

- Ability to certify environmental equivalence for some requirements
- Ability to certify impracticability for bulk container secondary containment requirements

Key Benefits – No P.E. Certification

- Most simple facilities do not need to deviate from secondary containment or other requirements
- Initial cost/burden if the P.E. is not in-house
- Continuing cost/burden for P.E. to certify any technical amendments to the Plan as time goes on
- Technical amendments can be a logistical as well as a cost issue when the original certifying P.E. is not available
- The Template Plan considerably eases Plan development

Key Benefits – No P.E. Certification

- Remember that a technical amendment is:
 - “Change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge...examples...include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures at a facility.” [112.5(a)]
- It’s pretty easy to make a facility change that requires a P.E. to recertify the Plan!

Owner/Operator (“O/O”) Self-Certification

- “Familiarity” with the SPCC regulation
- Has visited and examined the facility
- Plan prepared in accordance with accepted and sound industry practices and standards and the regulation itself
- Procedures for required inspections and testing are in place
- Plan will be fully implemented
- Facility meets the qualification criteria and is not claiming deviations based on environmental equivalence or impracticability
- Management has provided full approval and the necessary resources to fully implement the Plan

These directly derive from the P.E. certification requirements

Challenges of Self-Certification

- Is O/O **truly familiar** with SPCC regulation and standard guidance – e.g., applicability to mobile containers, intricacies of secondary containment for bulk storage and operational equipment?
- Does the Plan **really address** good engineering practice – e.g., does facility have knowledge of and access to the current STI SP001 standard (or other standards, e.g., API 653)?

Question: Have the QF requirements produced more compliance with the requirements, or simply many Template Plans that are incorrectly written or poorly implemented?

What QFs Get: No Facility Diagram Required

- Tier I QF can eliminate the facility diagram ordinarily required by 112.7(a)(3). U.S. EPA based this on belief that:
 - A diagram was unnecessary for low capacity/simple configuration facilities
 - Table G-2 of the Template Plan provides all need information
 - A diagram “...would provide minimal additional planning benefit to prevent an oil discharge from the facility”

What QFs Get: Other 112.7(a)(3) Items Eliminated

- Tier I QF can also eliminate:
 - 112.7(a)(3)(ii) description of discharge prevention measures, including routine handling procedures
 - 112.7(a)(3)(iii) description of discharge/drainage controls and procedures for controlling discharges
 - 112.7(a)(3)(v) methods for disposal of spill-related materials
- Although these can seem like very reasonable “control and countermeasure” requirements, U.S. EPA believed they were unnecessary for small/simple facilities

Tier I Facility Diagram and Description

■ Benefits:

- Simplifies Plan development
- No diagram lowers cost of compliance
- 112.7(a)(3) only requires location and contents of containers, so not super useful for spill planning

■ Challenges:

- A picture = 1,000 words – can make Plan review and regulatory agency inspections more difficult
- Writing descriptions/procedures forces actual thought about how to prevent and control discharges from oil handling processes – where most discharges occur as opposed to static storage

What QFs Get – [Subtle] Change in Failure Analysis under 112.7(b)

112.6(a)(3)(i) *Failure analysis, in lieu of the requirements in §112.7(b).*

Where experience indicates 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), include in your Plan 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.

112.7 (b) Where experience indicates 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 a discharge), include in your Plan a prediction of the direction, **rate of flow**, and total quantity of oil which could be discharged...

Container Failure Analysis



- U.S. EPA did not specifically explain this difference in the 2008 Federal Register
- In many cases, the **rate of flow** of a release is difficult to produce via an engineering-level calculation, or even to estimate, and engineering-level calculations are presumed unnecessary for QF
- However, the rate of flow can be an important consideration when active secondary containment measures – i.e., detection and cleanup – are selected
- Rate of flow may also be important for less customary passive secondary containment methods, such as use of an oil-water separator, a spill control tank, or building floors/walls

Eliminating Rate of Flow

■ Benefits:

- Simplifies Plan development
- Tends to simplify justifying use of a combination of active and passive secondary containment methods
- May avoid debates over spill assumptions, which are often difficult to develop and quantify

■ Challenges:

- May result in inappropriate secondary containment methods
- Can make judging Plan adequacy difficult if facility is in close proximity to waters of the U.S. or there are direct conduits such as sewer or storm drain entrances

What QFs Get – Oil Transfer Piping Elements Eliminated

- 112.7(h), (i); 112.8(b)(3), (4), (5), (c)(7); and (d)(1), (2), (3), and (5) are eliminated for Tier I QFs
- Address loading racks, field-constructed tanks, drainage from areas with aboveground piping and transfer operations, and belowground piping requirements
- Provisions were written primarily for large bulk oil storage facilities with extensive oil transfer piping (e.g., bulk terminals, facilities which burn fuel oil for power or steam production) where brittle fracture, pipe leaks, transfer operations, and steam-heated lines could cause major releases
- While these sections could theoretically apply to a Tier I QF, U.S. EPA believed these requirements were so rarely applicable that there was little risk by dropping them from QF Plans

Drainage and Transfer Piping

■ Benefits:

- Oil transfer piping at a QF facility (e.g., from a service bay to a waste oil tank, between a fuel tank and dispenser location) only must be regularly inspected. Buried piping is subject to leak testing when installed or repaired/modified, but secondary containment is not required (*under SPCC anyway...UST regulations may require it*)

■ Challenges:

- Piping leaks more often than containers – even small-diameter piping must be addressed in the Plan at least through periodic inspection
- Although specific engineering measures are not required, the 112.7(b) general secondary containment requirement still applies – if it can spill oil, containment must be provided

What QFs Get – Secondary Containment [Slightly] Relaxed

- 112.8(c)(2) and (11) are eliminated for Tier I QFs, which looks significant until you realize that 112.6(a)(3)(ii) puts most of those sections back in
- The bottom line: U.S. EPA basically combined the fixed and mobile/portable container secondary containment requirements and eliminated the requirement for containment to be “sufficiently impervious”
- All your favorite bulk storage containment requirements – like containment of 100% of the container capacity plus adequate freeboard for precipitation and positioning of mobile containers – still apply

What QFs Get – Secondary Containment [Slightly] Relaxed

- Huh?
- This was mostly a change with little meaning, since the Part 112.7 requirements already essentially cover everything that was eliminated for the QFs
- The dropping of “sufficiently impervious” was not expected to be meaningful for the vast majority of QFs

Benefits: None, perhaps where earthen berms or other minimal secondary containment methods are utilized

Challenges: Potential for confusion as to what the secondary containment requirements actually are

What QFs Get: The Template Plan

- Tier I QFs are allowed to use the Template Plan found in Appendix G to Part 112 (<http://www.epa.gov/oem/content/spcc/tier1temp.htm>)
- It is not a requirement to use the Template, but any equivalent or modified Plan must be supplemented with a section that cross-references the location of each specified requirement
- Because there are no California-specified additional requirements, *there appears to be little benefit to not using the U.S. EPA Template Plan*

The Template Plan

Challenges

- The Template Plan is not an effective tool for enhancing understanding of the SPCC regulation
- Due to the elimination of 112.7(a)(ii), (iii), and (b) requirements, Template Plan Table G-4 focuses on oil handling locations, not processes
- Table G-4 structure drives a one location/one discharge scenario correspondence, but in reality, there are often multiple discharge scenarios that should be considered



What QFs Do Not Get: EE and Bulk Storage Impracticability

- Tier I/II QFs cannot utilize the “environmental equivalence” (EE) option provided in Part 112.7(a)(2)
- Tier I/II QFs also cannot utilize Part 112.7(d), which allows an impracticability determination to be made in order to avoid secondary containment requirements
 - Unless they have a P.E. certify at least that portion of their Plan which addresses these requirements and provide a written statement as part of the Plan which includes the justification for and description of each alternative measure

What QFs Do Not Get: EE and Bulk Storage Impracticability

- U.S. EPA believed that these deviations were simply incompatible with a self-certified Plan, since most deviations would require some level of engineering judgment
- Alternative measures would likely require some level of engineering design, particularly as they are required to be site-specific
- U.S. EPA also thought that the “hybrid” approach (i.e., a Plan that is only partially P.E. certified) provided sufficient flexibility for a range of options

Part 112.7(d) Secondary Containment Impracticability

- Tier I QFs can remain Tier I and utilize 112.7(d) if:
 - They have a P.E. certify at least that portion of their Plan which addresses these requirements, and
 - Provide a written statement as part of the Plan which includes the justification for and description of each alternative measure



But Note for Equipment:

- Tier I QFs can still utilize 112.7(k) to address lack of secondary containment for oil-filled operational equipment
- The Template Plan is not very well designed on this point

EE and Impractability Alternatives

■ Benefits:

- Even if a P.E. has to get involved to address EE or secondary containment issues, other simplified QF requirements can still be utilized
- Since the P.E. only certifies specific Plan elements, s/he could conceivably ignore the rest

■ Challenges:

- As a practical matter, even if the P.E. only has to certify a portion of the Plan, the bulk of the cost/convenience benefits of self-certification disappear

Using the Template Form

- Although using the Template Form provides *a priori* compliance for a QF Plan, there are a few places that understate or overstate what is required for full compliance with the regulation

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

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

I certify that the following is accurate:

1. I am familiar with the applicable requirements of 40 CFR part 112;
2. I have visited and examined the facility;
3. This Plan was prepared in accordance with accepted and sound industry practices and standards;
4. Procedures for required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices;
5. I will fully implement the Plan;
6. This facility meets the following qualification criteria (under §112.3(g)(1)):
 - a. The aggregate aboveground oil storage capacity of the facility is 10,000 U.S. gallons or less; and
 - b. The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part 112 if the facility has been in operation for less than three years (not including oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism); and
 - c. There is no individual oil storage container at the facility with an aboveground capacity greater than 5,000 U.S. gallons.
7. This Plan does not deviate from any requirement of 40 CFR part 112 as allowed by §112.7(a)(2) (environmental equivalence) and §112.7(d) (impracticability of secondary containment) or include any measures pursuant to §112.9(c)(6) for produced water containers and any associated piping;
8. This Plan and individual(s) responsible for implementing this Plan have the full approval of management and I have committed the necessary resources to fully implement this Plan.

Only one person certifies – but can be difficult for one individual to simultaneously meet 1, 2, 3, 4, 6, and 7 (technical expertise) and 5 and 8 (management oversight)

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.		<input type="checkbox"/>
Oil Storage Container (indicate whether aboveground (A) or completely buried (B))	Type of Oil	Shell Capacity (gallons)
■	■	■

^a Aboveground storage containers that must be included when calculating total facility oil storage capacity include: tanks and mobile or portable containers; oil-filled operational equipment (e.g. transformers); other oil-filled equipment, such as flow-through process equipment. Exempt containers that are not included in the capacity calculation include: any container with a storage capacity of less than 55 gallons of oil; containers used exclusively for wastewater treatment; permanently closed containers; motive power containers; hot-mix asphalt containers; heating oil containers used solely at a single-family residence; and pesticide application equipment or related mix containers.

^b Although the criteria to determine eligibility for qualified facilities focuses on the aboveground oil storage containers at the facility, the completely buried tanks at a qualified facility are still subject to the rule requirements and must be addressed in the template; however, they are not counted toward the qualified facility applicability threshold.

The distinction and regulatory applicability differences between completely buried tanks and underground storage tanks subject to a State UST program is not clear from this statement. Does the preparer understand Parts 112.1 and 112.2?

Table G-4 Containers with Potential for an Oil Discharge					
Area	Type of failure (discharge scenario)	Potential discharge volume (gallons)	Direction of flow for uncontained discharge	Secondary containment method ^a	Secondary containment capacity (gallons)
<i>Bulk Storage Containers and Mobile/Portable Containers^b</i>					
<i>Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)^c</i>					

The Template does not directly address the very different containment requirements for bulk storage and oil-filled electrical operational equipment, nor does it lead the O/O to the correct calculation of “*the entire capacity of the largest single container and sufficient freeboard to contain precipitation*” and the “*typical failure mode, and the most likely quantity of oil that would be discharged...*”

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)]	<input type="checkbox"/>
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: _____	

The Template asks for a description of the inspection procedures as a component of 112.7(e) compliance, which is not actually the 112.7(e) requirement. Then it duplicates the description of inspections in Attachment 3.2 of the Template.

ATTACHMENT 3.2 – Bulk Storage Container Inspection Schedule – onshore facilities (excluding production):

To comply with integrity inspection requirement for bulk storage containers, inspect/test each shop-built aboveground bulk storage container on a regular schedule in accordance with a recognized container inspection standard based on the minimum requirements in the following table.

Table G-17 Bulk Storage Container Inspection Schedule	
Container Size and Design Specification	Inspection requirement
Portable containers (including drums, totes, and intermodal bulk containers (IBC))	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas
55 to 1,100 gallons with sized secondary containment	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas plus any annual inspection elements per industry inspection standards
1,101 to 5,000 gallons with sized secondary containment and a means of leak detection ^a	
1,101 to 5,000 gallons with sized secondary containment and no method of leak detection ^a	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas, plus any annual inspection elements and other specific integrity tests that may be required per industry inspection standards

^a Examples of leak detection include, but are not limited to, double-walled tanks and elevated containers where a leak can be visually identified.

Never makes clear what a “recognized container inspection standard” really is

Seems to suggest the “minimum requirements” in the Table are sufficient

The Table tracks to the STI SP001 standard but fails to convey that this Standard’s inspection requirements are very much more detailed than this (i.e., the STI inspection checklists).

Table G-10 General Rule Requirements for Onshore Facilities		N/A
Each container is provided with a system or documented procedure to prevent overfills for the container. Describe: █	<input type="checkbox"/>	<input type="checkbox"/>
Liquid level sensing devices are regularly tested to ensure proper operation [See Inspection Log and Schedule in Attachment 3.1]. [§112.6(a)(3)(iii)]	<input type="checkbox"/>	<input type="checkbox"/>

112.6(a)(3)(iii) requires a system OR documented procedure and regularly testing to ensure proper operation or efficacy.

It does not require “liquid level sensing devices.”

ATTACHMENT 1 – Five Year Review and Technical Amendment Logs

ATTACHMENT 1.1 – Five Year Review Log

I have completed a review and evaluation of the SPCC Plan for this facility and will/will not amend this Plan as a result.

Table G-13 Review and Evaluation of SPCC Plan for Facility			
Review Date	Plan Amendment		Name and signature of person authorized to review this Plan
	Will Amend	Will Not Amend	

There is nothing in 112.5(a) regarding who is “authorized” to perform a 5-year review.

ATTACHMENT 2 – Oil Spill Contingency Plan and Checklist

An oil spill contingency plan and written commitment of resources is required for:

- Flowlines and intra-facility gathering lines at oil production facilities and
- Qualified oil-filled operational equipment which has no secondary containment.

An oil spill contingency plan meeting the provisions of 40 CFR part 109, as described below, and a written commitment of manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is attached to this Plan.	<input type="checkbox"/>
--	--------------------------

Complete the checklist below to verify that the necessary operations outlined in 40 CFR part 109 - Criteria for State, Local and Regional Oil Removal Contingency Plans - have been included.

Table G-15 Checklist of Development and Implementation Criteria for State, Local and Regional Oil Removal Contingency Plans (§109.5)^a

(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.	<input type="checkbox"/>
(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.	<input type="checkbox"/>

The Template does not do a good job of specifying to the non-expert when an Oil Spill Contingency Plan would be needed (e.g., when general secondary containment cannot be provided for qualified oil-filled operational equipment). The heading “Plan and Checklist” suggests that by completing Attachment 2 a Plan has been created, which is not the case.

environment.

- (e) If the owner or operator of a facility determines pursuant to [paragraph \(a\)\(2\)](#) of this section that the facility could not, because of its location, reasonably be expected to cause substantial harm to the environment by discharging oil into or on the navigable waters or adjoining shorelines, the owner or operator shall complete and maintain at the facility the certification form contained in appendix C to this part and, in the event an alternative formula that is comparable to one contained in appendix C to this part is used to evaluate the criterion in [paragraph \(f\)\(1\)\(ii\)\(B\)](#) or [\(f\)\(1\)\(ii\)\(C\)](#) of this section, the owner or operator shall attach documentation to the certification form that demonstrates the reliability and analytical soundness of the comparable formula and shall notify the Regional Administrator in writing that an alternative formula was used.

Attachment C-II - Certification of the Applicability of the Substantial Harm Criteria

Facility Name: _____

Facility Address: _____

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes __ No __
2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
Yes __ No __
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula¹) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see appendix E to this part, section 13, for availability) and the applicable Area Contingency Plan.
Yes __ No __
4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III

The Template does not include or address the Certification of the Applicability of the Substantial Harm Criteria, which is required by Part 112.20(e).

Summary: Options for a Qualified Facility

- Self-certify the Template Plan
- Self-certify a modified Template Plan
- Have a P.E. certify only portions of the Tier I Template Plan
- Have a P.E. certify the entire Tier I Template Plan
- Follow the Tier II QF requirements (standard Plan, but still self-certify)
- Develop a standard, P.E.-certified Plan

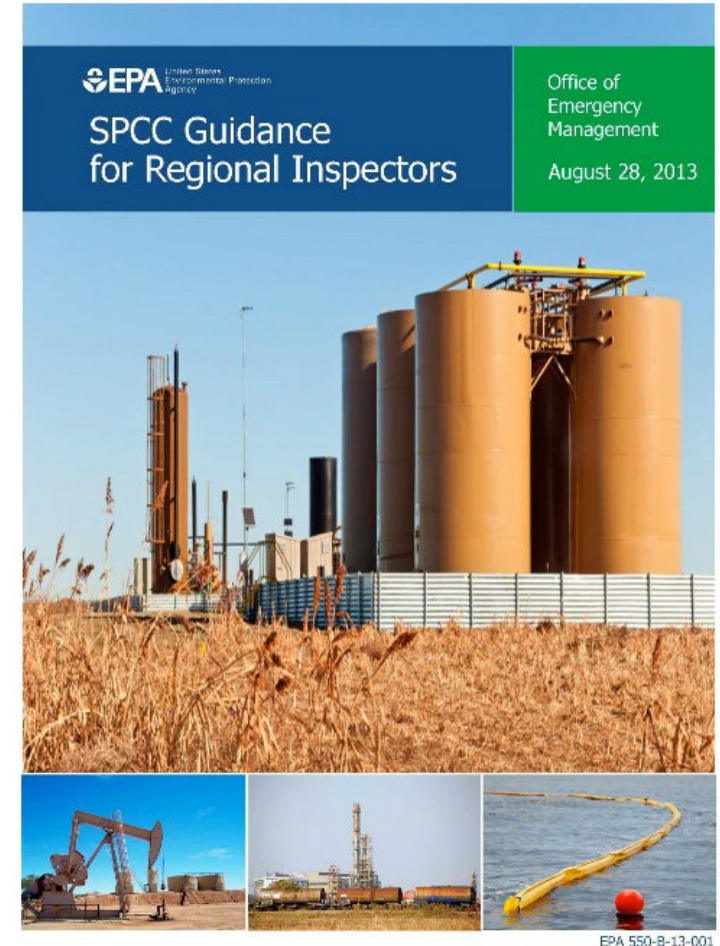
Why Not Use the Tier I Template?

- Compliance risk when the QF Plan writer is not experienced with the SPCC regulation and key interpretations (e.g., as found in U.S. EPA's Regional Inspectors Guidance)
- Elevated risk of environmental liability from spills/releases if Plan components are not well thought through
- P.E. certification should produce a more compliant Plan
- Facility management may be uncomfortable with the self-certification statement
- Facility/equipment configuration and financial considerations might require the facility to deviate from secondary containment requirements

The Indispensable Resource if You Will Write Any SPCC Plan – Even a Template Tier I

- Anyone who is writing SPCC Plans or regulating SPCC facilities **really must have** a copy of U.S. EPA's SPCC Guidance for Regional Inspectors

http://www.epa.gov/oem/docs/oil/spcc/guidance/SPCC_Guidance_fulltext.pdf



Other Resources

- **SP001 5th Edition, Standard For the Inspection of Aboveground Storage Tanks** (Steel Tank Institute, 6th Edition, January 2018)
[essential reference for developing/reviewing Tier I QF inspection procedures]
- **Federal Register / Vol. 71, No. 247 / Tuesday, December 26, 2006**
[introduced the QF concept and provides clarifying discussion]
- **Federal Register / Vol. 73, No. 235 / Friday, December 5, 2008**
[introduced the two-tier QF scheme and provides clarifying discussion]

Final Thought

- Tier I QFs obtained significant regulatory relief under the 2008 SPCC amendments
- You still need a good understanding of the SPCC regulation to use the Template Plan and ensure overall compliance