What to Expect When You're Implementing SPCC Plans

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27th California Unified Program Annual Training Conference
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Course Overview

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

Poll Question 1:

What is your role in implementing SPCC Plans?

Poll Question 2:

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

Qualified Facility

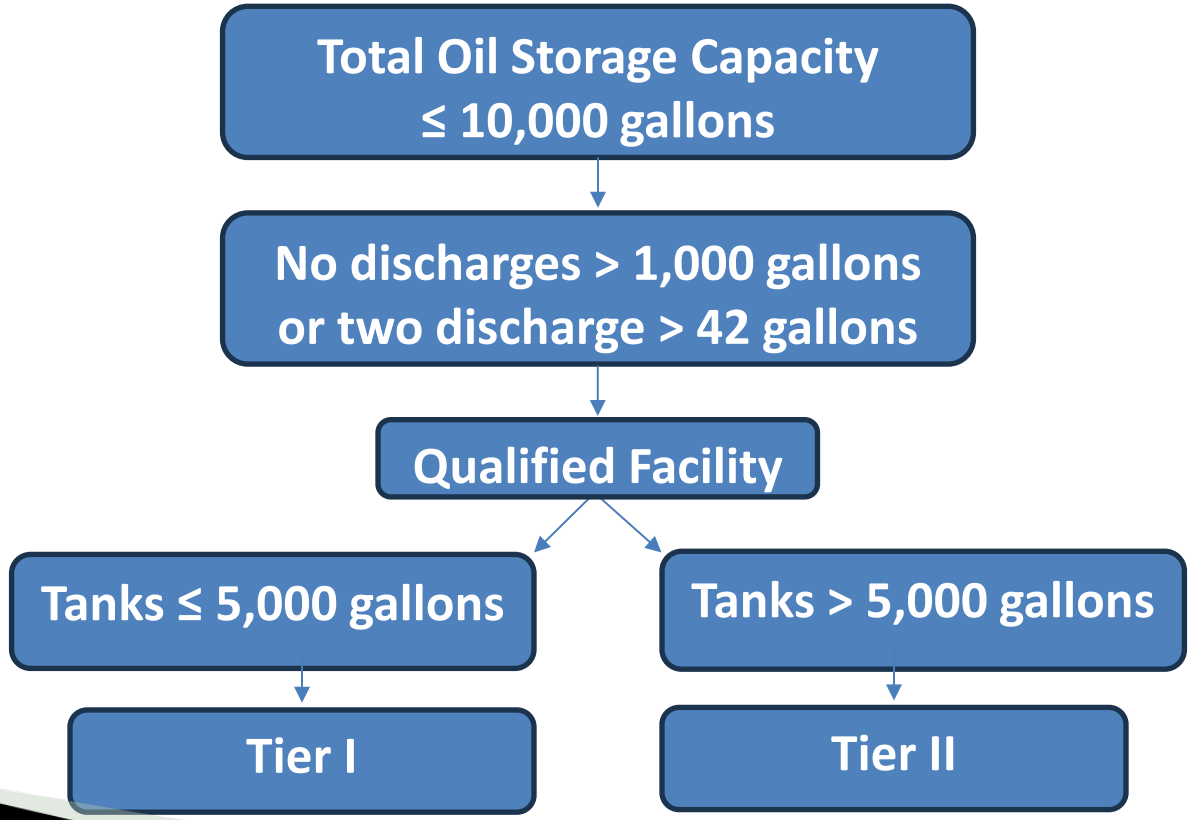
- Qualified Facility Applicability 40 CFR 112.3(g)
  - Less than 10,000 gallons of aboveground oil storage
  - In the past 3 years has not had:
    - A single discharge of oil greater than 1,000 gallons
    - Two discharges of oil each greater than 42 gallons within 12-months

Qualified Facility

- Discharge Definition 40 CFR 112.1(b)
  - Release oil that may be harmful into or upon the navigable waters of the United States or adjoining shorelines

- Discharges that “may be harmful” 40 CFR 110.3
  - Violate applicable water quality standards
  - Cause a film or sheen
  - Cause a sludge or emulsion to be deposited

Qualified Facility



CALIFORNIA CUPA FORUM

Qualified Facility

- Tier I Qualified Facilities 40 CFR 112.6(a)

  May prepare and implement a self-certified SPCC Plan
  - Tier I template from Appendix G to part 112;

- APSA Tanks In Underground Area (TIUGA) Facility
  - Also eligible for using the Tier I template;
  - A TIUGA only SPCC template is in development for less than 1,320 gallons.

Qualified Facility

- Tier I Self-Certification
  - You are familiar with the applicable requirements of 40 CFR part 112;
  - You have visited and examined the facility;
  - You prepared the Plan in accordance with accepted and sound industry practices and standards;
  - You have established procedures for required inspections and testing in accordance with industry inspection and testing standards or recommended practices;
  - You will fully implement the Plan; ….

Qualified Facility

- Tier I Self-Certification
  - The facility meets the qualification criteria in § 112.3(g)(1);
  - The Plan does not deviate from any requirement of this part as allowed by § 112.7(a)(2) (environmental equivalence) and 112.7(d) (impracticability of secondary containment) or include measures pursuant to § 112.9(c)(6) for produced water containers and any associated piping; and
  - The Plan and individual(s) responsible for implementing this Plan have the approval of management, and the facility owner or operator has committed the necessary resources to fully implement this Plan.

Qualified Facility

- Tier II Qualified Facilities 40 CFR 112.6(b)

  May prepare and implement a self-certified SPCC Plan
  - Tier II template from Office of the State Fire Marshal;

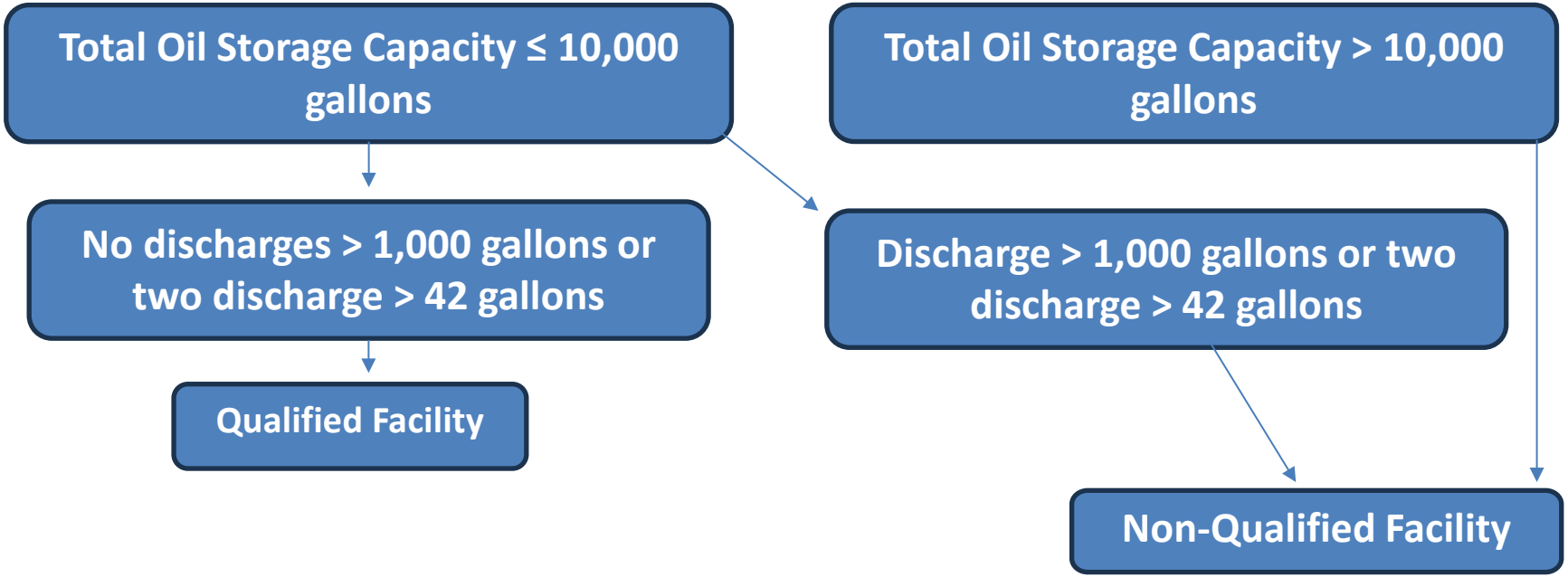
Qualified Facility

- Tier II Self-Certification
  - You are familiar with the requirements of this part;
  - You have visited and examined the facility;
  - You prepared the Plan in accordance with accepted and sound industry practices and standards, and with requirements of this part;
  - ~~You have established~~ Procedures for required inspections and testing have been established ~~in accordance with industry inspection and testing standards or recommended practices~~;
  - You will fully implement the Plan; …

Qualified Facility

- Tier II Self-Certification
  - The facility meets the qualification criteria in § 112.3(g)(2);
  - The Plan does not deviate from any requirement of this part as allowed by § 112.7(a)(2) (environmental equivalence) and 112.7(d) (impracticability of secondary containment) or include measures pursuant to § 112.9(c)(6) for produced water containers and any associated piping, except as provided in paragraph (b)(3) of this section; and
  - The Plan and individual(s) responsible for implementing this Plan have the approval of management, and the facility owner or operator has committed the necessary resources to fully implement this Plan.

Non-Qualified Facility



Non-Qualified Facility

- Non-Qualified Facility
  - Requires PE certified SPCC Plan

SPCC Rule Deviations

- Qualified Facility
  - Hybrid self-certified Tier II SPCC Plan with Professional Engineer (PE)-certified
    - Environmental Equivalence
    - Secondary Containment Impracticability
    - Produced Water secondary containment

- Non-Qualified Facility
  - May deviate from rule requirements due to PE-certified plan
  - May include a Facility Response Plan (FRP)

SPCC Overview

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

SPCC Overview

- SPCC Plan must include descriptions of:
  - Physical layout
  - Contents, capacity, location of fixed and portable oil containers;
  - Handling procedures to prevent discharges;
  - Discharge and drainage control equipment and procedures;
  - Countermeasures to discover, respond, cleanup and dispose of discharges and recovered material; and
  - Emergency contacts and first responders in case of a discharge.

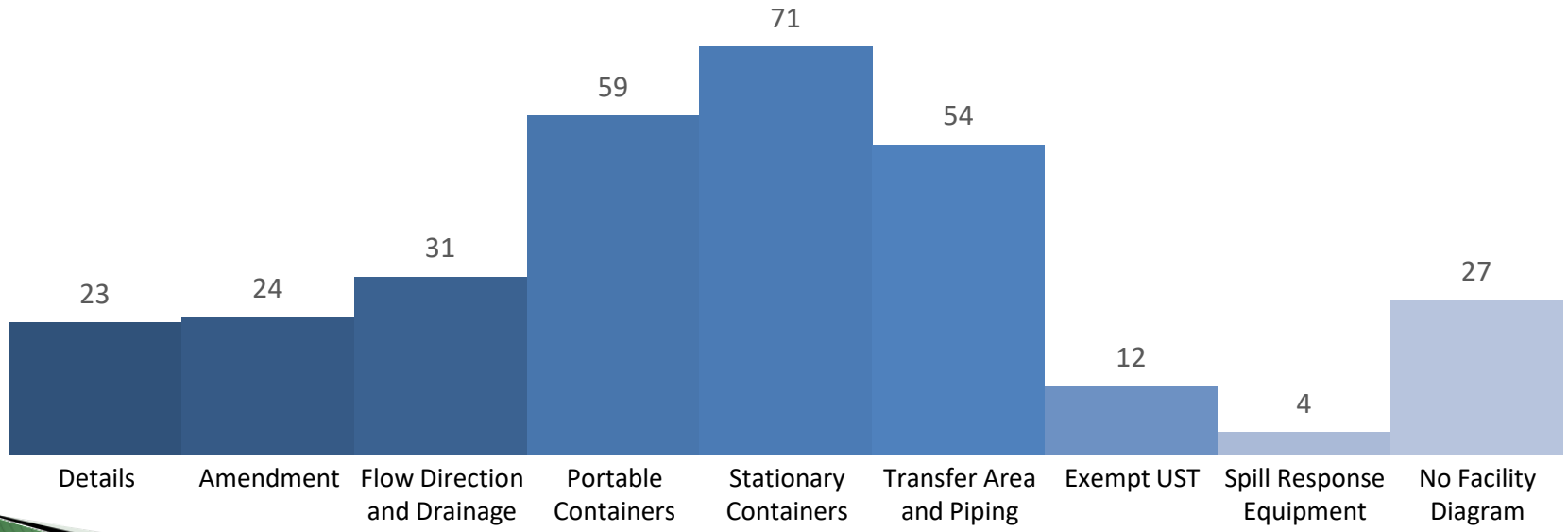
SPCC Overview

- Facility diagram must include:
  - Location and contents of fixed oil storage containers (bulk storage and oil-filled equipment);
  - Location of storage areas for mobile and portable containers;
  - Location of “exempt” underground storage tanks; and
  - Transfer stations and connecting pipes.

  - Tier I SPCC Plans do not require a facility diagram

Facility Diagram

APSA Inspection Violation Descriptions 2020 - 2024



Facility Diagram

SPCC Guidance for Regional Inspectors required items:

- Aboveground storage tanks (including location and contents);
- Underground storage tanks (including location and contents);
- Storage area(s) where mobile or portable containers are located;
- Transfer areas and loading/unloading racks;
- Oil-filled equipment (including location and contents);
- Oil-filled electrical equipment (including location and contents);
- Connecting piping; and
- Flowlines and intra-facility gathering lines.

Facility Diagram

Recommended additions:

- Aboveground storage tank capacities and/or tank identification numbers;
- Secondary containment structures, including oil/water separators used for containment;
- Storm drain inlets and surface waters that could be affected by a discharge;
- Direction of flow in the event of a discharge;
- Legend that indicates scale and identifies symbols;
- Location of response kits or other equipment for active containment;
- Location of firefighting equipment and pipe stands for foam application;

Facility Diagram

Recommended additions continued:

- Location of valves or drainage system controls;
- Location of important piping appurtenances;
- Compass direction indicating north; and
- Topographical information and area maps.

The facility diagram is important for discharge prevention and to help the facility and emergency response personnel to plan for emergencies.

Oil Spill/Discharge Requirements

- "Sheen Rule" Discharges that may be harmful:
  - Violates state water quality standards,
  - Causes a film or sheen on the water's surface, or
  - Leaves sludge or emulsion beneath the surface.

- Contact list and phone numbers 40 CFR 112.7(a)(3)(vi) for immediate reporting
  - National Response Center (NRC)
  - Cleanup contractors
  - Federal, State and local agencies

Oil Spill/Discharge Requirements

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

Oil Spill/Discharge Requirements

APSA Petroleum spill/discharge

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

Oil Spill/Discharge Requirements

Documentation

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

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

Date and Time of Release: _____

Date and Time of Discovery: _____

Material released: _____

Quantity of material released: _____

Quantity of material released to a waterbody: _____

SPCC Plan Implementation

- Contents of the SPCC Plan
- Supplemental Documentation
  - Training
  - Inspections
  - Spill History
  - 5-year evaluation and review
  - Amendments
  - Loading/Unloading Procedures

SPCC Plan Implementation

- Training
  - For personnel working around or with oil
  - Initial and annual refresher, including spill briefings
- Documentation
  - Roster with training topics
  - Retained for 3 years under 19 CCR 1611 (a)(7)

SPILL PREVENTION, CONTROL, AND COUNTERMEASURES COMPLIANCE TRAINING

Client Name – Facility Name
Address
City, State Zip Code

Training to Include:

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

Name of Trainer: _____ **Date:** _____

Name of Employee	Signature	Job Title
_____	_____	_____
_____	_____	_____

SPCC Plan Implementation

- Inspections, Testing and Records 112.7(e)
  - Applies to components of the SPCC Plan (containers, oil filled equipment, containment, contained rainwater and diversionary structures)
  - Written procedures for inspections and tests by the certifying engineer
  - Supervisor or inspector signs procedures and inspections and tests records
- Documentation
  - Retain records for 3 years
  - Longer record retention requirements may apply
    - Formal tank inspections and testing retain for life of the tank

SPCC Plan Implementation

- Integrity Inspections
  - Bulk Storage Containers 112.8(C)(6)
    - Inspection type and frequency based on container size, configuration and design
    - Qualified personnel
    - Include inspection of the supports and foundation
    - Frequently inspect the outside for deterioration, discharges and oil in diked areas.

SPCC Plan Implementation

- Bulk Storage Integrity Inspection Standards
  - Steel Tank Institute (STI)
    - SP001 Standard for the Inspection of Aboveground Storage Tanks - 7th Edition
  - American Petroleum Institute (API)
    - Standard 653: Tank Inspection, Repair, Alteration, and Reconstruction – 5th Edition
  - Fiberglass Tank & Pipe Institute
    - RP 2007-1

Integrity Inspections

STI SP001 Monthly Inspection Checklist

General Inspection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____

Inspector Name (print): _____

Inspector's Signature _____

Tank(s) inspected ID _____

Regulatory facility name and ID number (if appl

Inspection Guidance:

- This checklist is intended as a model. Lo tanks may be captured on one form as lo
- For equipment not included in this Standa
- The periodic AST Inspection is intended Inspector. It shall be performed by an ow
- Upon discovery of water in the primary ta for regulated products or other contamina
- Non-conforming items important to tank manufacturer who will determine the corr
- Retain the completed checklists for at lea
- **After severe weather (snow, ice, wind emergency vents, valves), an inspecti**

ITE

STI SP001 Portable Container Monthly Inspection Checklist

General Inspection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____

Inspector Name (print): _____

Inspector's Signature: _____

Container(s) inspected ID _____

Regulatory facility name and

Inspection Guidance

- This checklist is intend
- This periodic Inspectio Certified Inspector. It s the non-conformance a
- Retain the completed

	Ite
1	Are all portable containe storage area?
2	Is the containment and s liquid, debris, cracks or f
3	Are drain valves closed condition?
4	Are containment egress

STI SP001 Annual Inspection Checklist

General Inspection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____

Inspector Name (print): _____ Title: _____

Inspector's Signature: _____

Tank(s) inspected ID _____

Regulatory facility name and ID number (if applicable) _____

Inspection Guidance:

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable).
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- Remove promptly standing water or liquid discovered in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.

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Poll Question 3:

Inspections

- How soon after a rain event should a secondary containment dike be inspected and drained?

SPCC Plan Implementation

- Facility Drainage 112.8(b) & 112.8(c)
  - Inspect the accumulated storm water in diked areas
  - Drain uncontaminated retained storm water
  - Open the bypass valve and reseal it following drainage under responsible supervision
  - Keep adequate records

Poll Question 4:

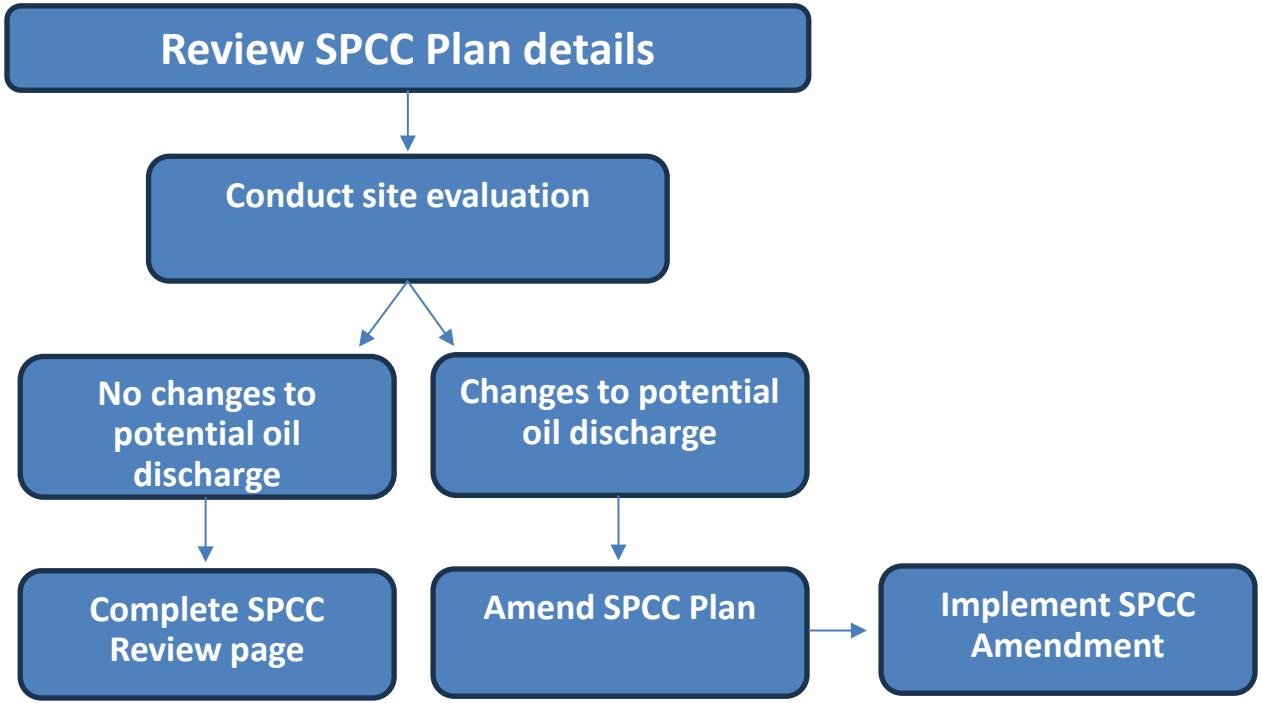
Amendments

- A non-qualified Facility with SPCC Plan had a change in personnel and contact information. Does the SPCC Plan need to be recertified by an engineer?

SPCC Plan Implementation

- SPCC Plan 5-Year Review
  - Required within 5 years of last site evaluation and plan review
  - Review Plan and Facility details
  - Contact information changes are often missed
- Documentation
  - Log and indicate if an amendment is needed

5-Year Review



Site Evaluation Findings

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

Poll Question 5:

Amendments

- A used oil tank was replaced with an identical tank in the same location of a non-qualified facility SPCC Plan. Does the SPCC Plan need to be recertified by an engineer?

Poll Question 6:

Amendments

- 55-gallon oil drums were relocated to a new storage area in a non-qualified facility SPCC Plan. Does the SPCC Plan need to be recertified by an engineer?

SPCC Plan Implementation

- SPCC Plan Amendments are required within 6 months of administrative or technical changes.
- 6 months to implementation procedures or equipment not yet fully operational in an amended SPCC Plan.

ASPA Requirements

- APSA regulates tank facilities

  California Health and Safety Code, Division 20, Chapter 6.67
  - Scope and definitions
  - Requirements for tank facilities
  - Implementation by the Unified Program Agency

ASPA Requirements

- Aboveground Petroleum Storage Act (APSA) Program Regulations

  California Code of Regulations Title 19, Division 1, Chapter 11

  - Scope and definitions
  - Corrosion protection and intended use
  - Implementation by the Unified Program Agency
  - Owner or operator requirements for inspections and reporting

ASPA Requirements

- APSA Program Regulations Highlights
  - 1611(a)(7) requires annual spill prevention briefings to be recorded, and records kept for 3 years.
  - 1607(b) UST tanks shall not be used as AST tanks.
  - 1607(c) a rail car, tank car, or tank vehicle shall not be used as a storage tank in a permanent, or fixed installation.
  - 1612(d) The failure to prepare an SPCC plan shall not be classified as a minor violation.

ASPA Requirements

Owner/operator Electronic Reporting Requirements

- APSA California Environmental Reporting System (CERS)annual reporting:
  - Conditionally exempt from SPCC Plan status;
  - Date of SPCC Plan certification or last 5-year review, whichever is more recent;
  - Total aggregate petroleum storage capacity of a tank facility in gallons; and
  - Number of tanks in an underground area (TIUGA less than 1,320 capacity)

ASPA Requirements

Owner/operator Electronic Reporting Requirements

- File a tank facility statement or HMBP chemical inventory with the CUPA:
  - Annually, on or before date specified by local CUPA
  - Hazardous Materials Business Plan (HMBP) may satisfy this requirement

UNIFIED PROGRAM CONSOLIDATED FORM
ABOVEGROUND PETROLEUM STORAGE ACT
TANK FACILITY STATEMENT

I. IDENTIFICATION

FACILITY NAME (Same as BUSINESS NAME or DBA-Doing Business As)		FACILITY PHONE
FACILITY ADDRESS		
FACILITY CITY	CA	ZIP CODE
CONTACT NAME		CONTACT PHONE

II. TOTAL FACILITY STORAGE CAPACITY

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

III. TANK AND CONTAINER DETAILS

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

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

Summary
SPCC Rule Requirements

- **Prepare** an SPCC Plan following 40 CFR 112
- **Implement** SPCC Plan
- **Update** SPCC Plan

Summary
ASPA Requirements

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

Questions

What To Expect When You're Implementing SPCC Plans

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