Objectives

- *Very, very, quickly* remind you of:
  - Key federal SPCC Rule requirements & key federal SPCC Plan components
- Summarize T-1 QF applicability
- Go through a step by step, section by section discussion of how to prepare a *good* SPCC Plan using the Tier I SPCC Plan Template for Qualified Facilities
  - 'Good'? i.e. implementable, operationally flexible, incorporates compliance 'tools', etc.
- Provide you with a set of compliance tools
- Answer your questions regarding compliance, implementation, etc.

Completing a GREAT Tier I Qualified Facility SPCC Plan

Hand Raising Time!

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

1 10

Completing a GREAT Tier I Qualified Facility SPCC Plan

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

Completing a GREAT Tier I Qualified Facility SPCC Plan

WORTH REPEATING…

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

Completing a GREAT Tier I Qualified Facility SPCC Plan

Hidden Slides!

- Print version (the 3 slide per page downloadable handout) has a bunch of 'hidden' slides
  - You'll see the 'hidden' tag on the handout
- Not going to show/discuss them here
- If we did the 'back-up' session Monday afternoon (M-G3), we covered them there
  - If USEPA was able to attend/present… We didn't do the back-up class (so those slides are included here, but hidden).

Completing a GREAT Tier I Qualified Facility SPCC Plan

Overall Goal/Objective of the Federal and California Requirements

- Ensure proactive measures are used to prevent and control oil/petroleum discharges
  - To navigable waters & waters of the State
- Main emphasis on proactive measures (engineering- and procedure-based controls)
  - 'Less' emphasis on reactive measures
- Written SPCC Plan documents these facility-specific measures and the means of achieving these measures

Completing a GREAT Tier I Qualified Facility SPCC Plan

SPCC Compliance means:

1. Complying with the detailed regulatory requirements
2. **Writing the descriptive facility-specific SPCC Plan per the rule**
   - Tier I QFs would use the template for this
3. Assuring that the Plan is consistent with field conditions, and
4. Implementing the Plan as written

And then keep doing 1, 3 & 4... and revisit #2 as needed)

Completing a GREAT Tier I Qualified Facility SPCC Plan

Written Plan vs Implementation?

- Two Tier-1 facilities: Both with a complete, well-written T-1 template Plan
- See the difference?

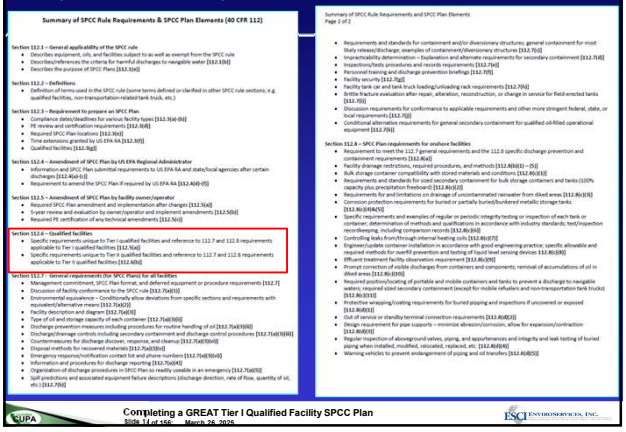
Completing a GREAT Tier I Qualified Facility SPCC Plan

SPCC Compliance: Rule and the Plan

- Compliance requirements met <u>mostly</u> by:
  - Site-specific and performance-oriented methods, engineering & systems, plans, procedures and activities
    - Remember: not ***<u>just</u>*** having a written Plan – no matter what format
    - ✦Goal: To keep oil from being discharged… and no matter what – keep oil out of navigable waters of US & waters of the State
  - Rule provides some guidance, examples or end-point goal for specific requirements
- Facility owner/operator certifies all is correct, adequate, complete and is/to be implemented

CUPA Completing a GREAT Tier I Qualified Facility SPCC Plan Slide 13 of 156 March 26, 2025 ESCI ENVIROSERVICES, INC.

Helpful & Handy Reference



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

Summary of SPCC Rule Requirements and SPCC Plan Elements
Page 2 of 2

CUPA Completing a GREAT Tier I Qualified Facility SPCC Plan Slide 14 of 156 March 26, 2025 ESCI ENVIROSERVICES, INC.

Helpful & Handy Reference

Uncle Steve's Tank / Container Summary Requirements Cheat Sheet For Tier I Qualified Facilities
(a brief summary of some (but NOT all) requirements)

Term Used in U.S. EPA SPCC Rule	Term Used in APSA (see FAQ)	Containment Req'd. (40 CFR 112 rule ref.)	Inspections or Integrity Test Req'd? (40 CFR 112 rule ref.)	Other / Comment
Bulk containers (fixed/stationary)	Aboveground storage tank	Sized (100% capacity) containment + precipitation freeboard (112.6(a)(3)(iii))	Regular inspections and frequent integrity testing (112.8(c)(6)). Must also test overfill prevention systems or procedure to ensure proper operation or efficacy (112.6(a)(3)(iii)).	Systems or written procedures for overfill prevention (112.6(a)(3)(iii))
Portable/mobile bulk containers (except mobile refuelers & NTRTTs)	Aboveground storage tank	Sized (100% capacity) containment + precipitation freeboard (112.6(a)(3)(iii))		Systems or written procedures for overfill prevention (112.6(a)(3)(iii)) Position to prevent nav. water discharge (112.6(a)(3)(ii))
Mobile refuelers & non-transportation- related tank trucks (NTRTTs) (A subcategory of portable/mobile bulk containers)	Aboveground storage tank	General containment (or other diversionary measures or equipment) (112.7(c))		
Oil-filled electrical equipment	Aboveground storage tank (sub-definition: oil filled electrical equipment)	General containment (or other diversionary measures or equipment) (112.7(c))	Not specifically required by 40 CFR 112… but HSC 25270.2(a)(4)(B) requires routine inspections.	Conditionally APSA exempt.
Oil-filled operational & equipment	Aboveground storage tank	General containment (or other diversionary measures or equipment) (112.7(c))	Not specifically required by 40 CFR 112.	Includes hydraulic tanks & systems, aboveground oil/water separators and other equipment.
Loading & unloading areas, oil transfer areas	No specific term	General containment (or other diversionary measures or equipment)(112.7(c))	Not specifically required by 40 CFR 112.	
Facility transfer operations, pumping & facility process (and aboveground piping)	No specific term	General containment (or other diversionary measures or equipment)(112.7(c))	Regular inspections (112.8(d)(4)).	Also must inspect if buried piping is exposed.

* Sized containment may include diversion to a catchment basin or similar confined termination area.

Uncle Steve's Tank / Container Summary Requirements Cheat Sheet For Tier I Qualified Facilities

(a brief summary of some (but NOT all) requirements)

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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 specifications & "performance-oriented" requirements for:
  - Engineering-based spill prevention
    - ✦Containment, discharge controls, etc.
  - Procedure-based spill prevention
    - ✦Inspections, overfill prevention, containment drainage, leak correction, spill response, etc.
  - Administrative-based spill prevention
    - ✦Training, management review & certification, recordkeeping, etc.

Completing a GREAT Tier I Qualified Facility SPCC Plan
Slide 14 of 156 March 26, 2025

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SPCC Rule vs SPCC Plan

- Federal SPCC rule is applicable to California facilities
- The federal SPCC rule (40 CFR 112.1 – 112.8) contains requirements & specifications for:
  - ✦As applicable to Tier I Qualified Facilities
  - Engineering-based spill prevention (112.6, .7 & .8)
    - *Performance-oriented* design requirements or options for most of the following
    - ✦Secondary containment and containment impermeability
    - ✦Discharge controls (drainage valves)
    - ✦Security of oil handling equipment & areas
    - ✦Compatibility with materials stored and conditions

Completing a GREAT Tier I Qualified Facility SPCC Plan
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SPCC Rule vs SPCC Plan (continued)

- …requirements & specifications for:
  - 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

Completing a GREAT Tier I Qualified Facility SPCC Plan
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SPCC Rule vs SPCC Plan (continued)

- …requirements & specifications for:
  - 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

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SPCC Rule vs SPCC Plan (continued)

- …requirements & specifications for:
  - Administrative spill prevention (112.3, .4, .5, .6, .7 & .8)
    - ✦Regular review of the SPCC Plan
      - And amendment if necessary within a specified timeframe
    - ✦Facility management review and certification of SPCC Plan
    - ✦Training of oil handling personnel
    - ✦Keeping records of containment drainage events, inspections and integrity tests

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SPCC Rule vs SPCC Plan (continued)

- …requirements for:
  - Discharge control, response & countermeasures (112.7)
    - ✦Countermeasures for discharge discovery, response and cleanup
    - ✦Contact list and phone numbers for facility response coordinator; federal, state and local response agencies and any contracted spill contractors
    - ✦Procedures for (federal) oil discharge reporting
    - ✦Management commitment for response

SPCC Rule vs SPCC Plan: So, what's the *Plan* for (template version)?

- A written, facility-certified plan document
  - Check-the-box affirmations of compliance
  - Many narrative descriptions of how the facility achieves/maintains compliance with the particular requirement
- Mostly up to the facility to determine the appropriate, site-specific means of rule compliance
  - Rule places faith in the management certification and determinations
  - Rule places responsibility for accuracy & implementation on the facility
- Remember! Federal rule & APSA requires that the SPCC Plan be implemented
  - Do NOT just 'check and forget'

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Aren't I Already Doing This Stuff???

- *Should* already doing much of it
  - Training
  - Inspections/evaluations
  - Stormwater discharge evaluations/logs
  - Secondary containment
  - Business emergency plans
  - Overfill prevention practices
- No need to duplicate efforts
  - Just make sure what you are already doing meets the SPCC rule requirements

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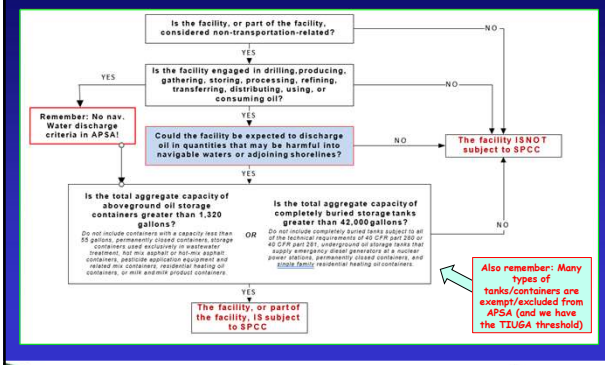
SPCC Applicability Flowchart



APSA vs Federal SPCC Rule?

- APSA does NOT preempt the federal SPCC rule
  - UPA inspects for APSA compliance, US EPA inspects for 40 CFR 112
  - Regulated facilities must comply with APSA *and* SPCC rule – as applicable
- 40 CFR 112 covers more oil types than APSA
  - Feds: *All* oil… APSA: Petroleum *only*
  - *But: Count ALL oils and APSA excluded tanks, OFE, etc. when determining QF applicability*
- 40 CFR 112 applies only to facilities which could discharge oil into a navigable water
  - APSA does NOT contain that criterion… so APSA applies regardless of threat to navigable waters

Completing a GREAT Tier I Qualified Facility SPCC Plan
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APSA vs Federal SPCC Rule?

- APSA contains conditional exemptions for tanks and facilities that the federal rule does not
- Tank facilities operating in California may be subject to requirements of both programs
  - Requirements of APSA and SPCC are similar but not identical
- APSA references the SPCC Plan requirements established in 40 CFR 112 as the standards required to comply with the APSA SPCC Plan provision
  - Under APSA, SPCC Plans are required to be prepared and implemented in accordance with the regulations established in the 40 CFR 112 federal oil spill prevention program

Completing a GREAT Tier I Qualified Facility SPCC Plan
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APSA vs Federal Oil Spill Prevention Program:

Why Understanding the Difference for QF Applicability is Important

'Qualified Facility' is a 40 CFR 112 criteria: For applicability, must count all 40 CFR 112 oils & containers… not just APSA-regulated petroleum & non-APSA-exempt containers

US EPA-only applicability

Includes APSA exempt facilities, tanks and non-petroleum oils

APSA-only applicability

Excludes APSA exempt facilities, tanks and non-petroleum oils; *No* navigable water risk criteria

So… where is the Qualified Facility applicability determination made?

Joint EPA & APSA Applicability

Completing a GREAT Tier I Qualified Facility SPCC Plan
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So… What Do You Count Toward the 1,320 Gallon SPCC Threshold (and the Qualified Facility Threshold)?

- Nothing with less than 55 gallons capacity
- **The following if they have 55 gallons or more capacity of *oil* (including liquid 'petroleum')**
  - Except completely buried, permitted USTs
  - **Tanks**
  - **Containers**
  - **Process equipment**
  - **Manufacturing equipment**
  - **Hydraulic equipment**
  - **Electrical equipment**
  - **Non-transportation related tank trucks**

Tanks Exempted under APSA

Has nothing to do with Qualified Facility Applicability Determination

- **Federal (US EPA) and APSA Exempt:**
  - Exempt from BOTH APSA and federal SPCC regulation
  - **Tanks & containers used for transportation**
  - **CUPA-regulated USTs (*not* TIUGAs)**
    - US EPA: Must be completely buried USTs
- **APSA-only Exempt:**
  - NOT exempt from federal SPCC (and *do* count toward 1,320 gal.)
  - **Boilers & pressure vessels**
  - **Waste oil tanks**
    - Only if PBR Tiered Permit or DTSC permitted HW facilities
  - **Crude oil production tanks**
  - **Most oil-filled electrical equipment**
    - < 10,000-gallon capacity are all APSA exempt

Helpful & Handy Reference

- **Uncle Steve's Summary Applicability Differences**

Summary Applicability Differences

	APSA HSC Chapt. 6.67	Federal SPCC Rule 40 CFR 112	Comments
Exempt Facility Types	• Farms • Nurseries • Construction sites • Logging sites	No exemption for these types of facilities	Conditional APSA exemption from SPCC Plan preparation/ implementation only
Exempt Tank & Equipment Types	• Oil filled electrical equipment • Crude oil production-related tanks (PRC §3106) • Boilers & pressure vessels • Haz waste tanks at DTSC-permitted facilities • CUPA-regulated USTs	Completely buried USTs in compliance with all state UST requirements	Conditional APSA exemption for oil-filled electrical equipment
Exempt activity-related tanks and equipment	Tanks, vehicles, railcars, transport pipelines and vessels used in transportation	Same	Must be actively engaged in transportation activities
Type of oil regulated	Petroleum liquids	Any type of oil or oil product • Petroleum • Vegetable • Animal • Synthetic	
Tank definition	• "Aboveground storage tank" = tanks, containers, oil-filled equipment, and non-transportation related tank trucks	• Bulk containers = tanks and containers • Oil-filled equipment • Non-transportation related tank trucks	40 CFR 112 has specific definitions for each
Minimum tank or container capacity threshold for applicability determination or capture	55 gallon	Same	
Minimum facility aggregate capacity threshold for applicability determination or capture	1,320 gallons of liquid petroleum	1,320 gallons total of any type of oil	
Facility definition	Narrow – related to tank ownership or operational control on a single site	Broad – related to several additional factors	APSA = 'tank facility' 40 CFR112 = 'facility'
Petroleum or oil-related activities captured	Containing, storing, processing (non-crude), refining, transferring, distribution, use, or consumption	Drilling, production, gathering, storing, processing, refining, transferring, distribution, use, or consumption	Though not defined in the ACT, 'contains' is interpreted broadly for APSA purposes. Due to the APSA exemption for PRC §3106-regulated crude oil production tanks, oil production activities are not captured under APSA
Environmental threat threshold for applicability determination or capture	No environmental threat criteria	Reasonable likelihood of harmful discharge to navigable waters of US	

Uncle Steve's Summary Applicability Differences

	APSA HSC Chapt. 6.67	Federal SPCC Rule 40 CFR 112	Comments
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Type of oil regulated	Petroleum liquids	Any type of oil or oil product: • Petroleum • Vegetable • Animal • Synthetic	No minimum threshold for oil or petroleum concentration. Essentially any percentage of oil or petroleum in a mixture.
Tank definition	• "Aboveground storage tank" = tanks, containers, oil-filled equipment, and non-transportation related tank trucks	• Bulk containers = tanks and containers • Oil-filled equipment • Non-transportation related tank trucks	40 CFR 112 has specific definitions for each
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APSA Exempt Tanks and Exempt Facilities: The items that may not count toward 1,320 gal. under APSA

- **Two broad exemptions from California APSA & CUPA regulation**
  - Most APSA exemptions have **no** impact on federal SPCC compliance – only a few have a federal impact
  1. **Exempt *Tanks*** (HSC § 25270.2(a)(1 – 8)
     - Some exemptions are conditional
  2. **Exempt *Facilities*** (HSC § 25270.4.5(b)
     - **Four categories: Farms, nurseries, logging and construction sites**
  - Exempt only from APSA requirement to prepare & implement an SPCC Plan
    - **Still must pay fees and complete the inventory and APSA Facility information in CERS**
  - Exemptions are conditional

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APSA Exempt Tanks and Plan Exempt Facilities

- **Two broad exemptions:**
  1. **Exempt Tanks (HSC § 25270.2(a)(1 – 8)**
     - Exempt from being defined as APSA aboveground storage tanks
     - Some specific exemption conditions/criteria
       - **Most APSA exempt tanks are STILL federally regulated under 40 CFR 112**
  2. **Exempt Facilities (HSC § 25270.4.5(b)**
     - Exempt ***only*** from APSA requirement to prepare & implement an SPCC Plan
       - **Likely not exempt from federal SPCC rule and USEPA regulation**
     - All have specific exemption conditions

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Tanks Exempted under APSA

1. **Boilers & pressure vessels**
2. **Waste & used oil tanks** (still federally regulated)
   - **Located at DTSC permitted TSDFs (listed on the permit), or specifically listed on a facility's PBR Tiered Permit**
3. **Crude oil production tanks** (still federally regulated)
4. **Most oil-filled electrical equipment** (still federally regulated)
5. **UPA-regulated USTs**
6. **Transportation-related tank facility**
   - **The actual transportation-related tanks are exempt… not the entire facility**
7. **Tanks at farms (and the whole farm) if 40 CFR 112 exempt**
   - **WRRDA small farms (see OSFM Farms FAQ Question 4)**
8. **TIUGAs <55 gal. (contained and inspected monthly)**

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Facilities Exempt from APSA:

None are federally SPCC Exempt

Exempt Facilities (HSC § 25270.4.5(b))

- ✦Exempt only from APSA requirement to prepare & implement an SPCC Plan
  - All other APSA requirements apply (fees, etc.)
- ✦Conditional exemption
  - ☠Farms
  - ☠Nurseries
  - ☠Construction sites
  - ☠Logging sites

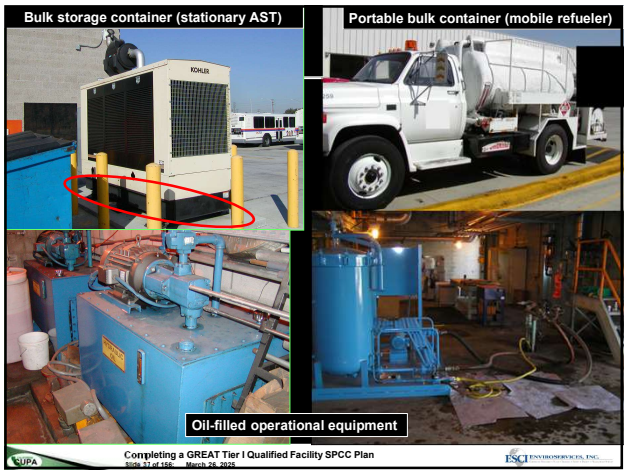
Completing a GREAT Tier I Qualified Facility SPCC Plan

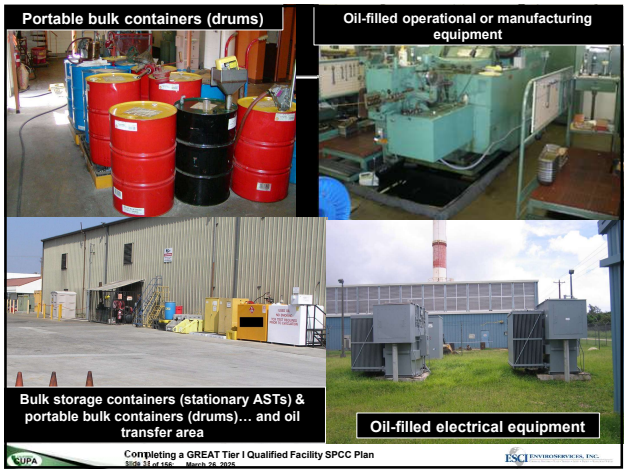
Bulk storage containers (stationary ASTs)

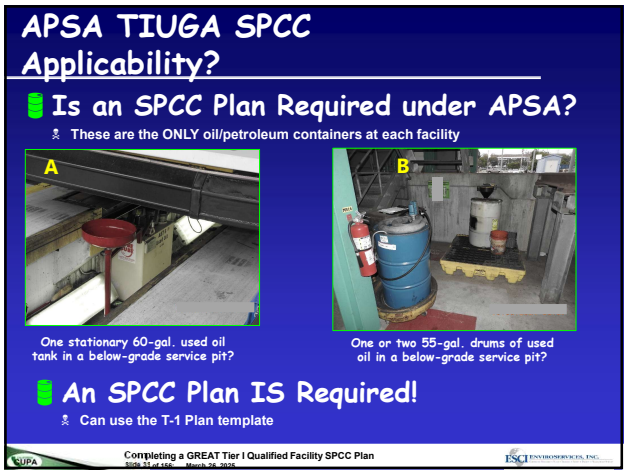
Completing a GREAT Tier I Qualified Facility SPCC Plan

Bulk storage containers (stationary ASTs) & portable bulk containers (drums)

Completing a GREAT Tier I Qualified Facility SPCC Plan







Qualified Facility – An Overview

- A 40 CFR 112 definition…not APSA
- Smaller oil storage facility that is eligible for alternative streamlined regulatory requirements
- Must meet eligibility criteria to use alternative option
- Self-certified SPCC Plan instead of one reviewed and certified by a Professional Engineer (PE)
- Divided into two tiers
  - Tier II – self certify the SPCC Plan
    - Can PE-certify certain specific sections
  - Tier I - self certify and eligible to complete a template with fewer requirements

What Type of SPCC Regulated Facility Are You?

- The three types of SPCC/ APSA tank facilities:

- Tier I Qualified Facilities
  - ✦Can use the US EPA SPCC Plan template to prepare the site specific SPCC Plan & self-certify
    - Fewer specific requirements
    - No engineering flexibility
- Tier II Qualified Facilities
  - ✦Prepare a 'regular' site specific SPCC Plan & self certify
    - Can use the OSFM Tier 2 Plan template
    - Limited and conditional engineering flexibility (with PE cert)
- Non-qualified facilities
  - ✦Prepare a 'regular' site specific SPCC Plan & PE review & certify

Qualified Facilities Eligibility Criteria

Reportable Discharge History

In the 3 years prior to Plan certification date or when facility began operating (whichever is less)

A single discharge of oil to navigable waters or adjoining shorelines exceeding **1,000 U.S. gallons**, OR

Two discharges of oil to navigable waters or adjoining shorelines each exceeding **42 U.S. gallons** within any 12-month period

OIL Storage Capacity

Tier II	Tier I	No Longer Qualified
Aggregate aboveground oil storage capacity ≤10,000 gallons	Tier II AND No oil storage container >5,000 U.S. gallons	If facility capacity increases >10,000 gallons

Spills vs Navigable Water Discharges

- Spills & releases to the ground →

- Discharges to navigable water ←

Completing a GREAT Tier I Qualified Facility SPCC Plan
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Reportable Discharge History

- The gallon amount(s) specified (either 1,000 or 42) refers to amount of oil that actually reaches navigable waters or adjoining shorelines, not the total amount of oil spilled
- Do not include oil discharg
  - natural disasters, acts of war, or terrorism
  - Oil discharges that result from vandalism are included
- Facilities that have a reportable oil discharge after self-certifying the SPCC Plan do not automatically lose eligibility
  - The Regional Administrator has the authority to require a Plan amendment

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Completing a GREAT Tier I Qualified Facility SPCC Plan
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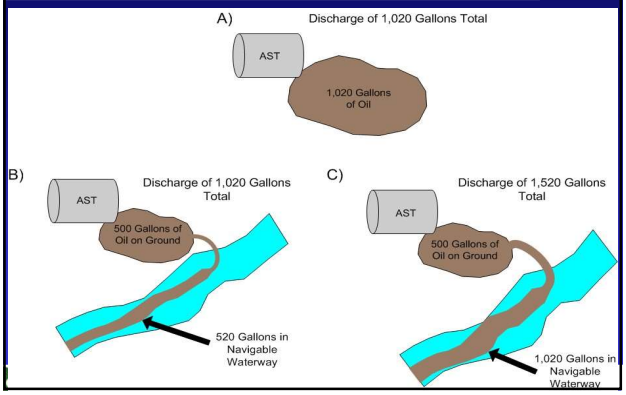
Understanding Discharge Criterion



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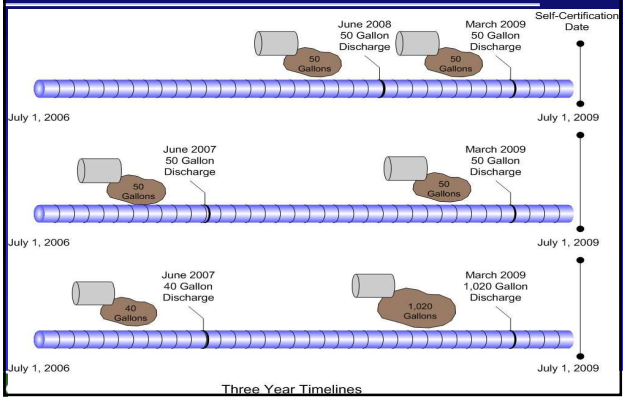
Understanding Discharge History



Three Year Timelines

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Discharge History Criterion

- A one-time determination
  - i.e., a "snap shot" of a facility's compliance history
  - Facilities do not require a re-assessment of eligibility following a technical change to the Plan or 5-year review

Loss of Tier I Qualified Facility Eligibility?

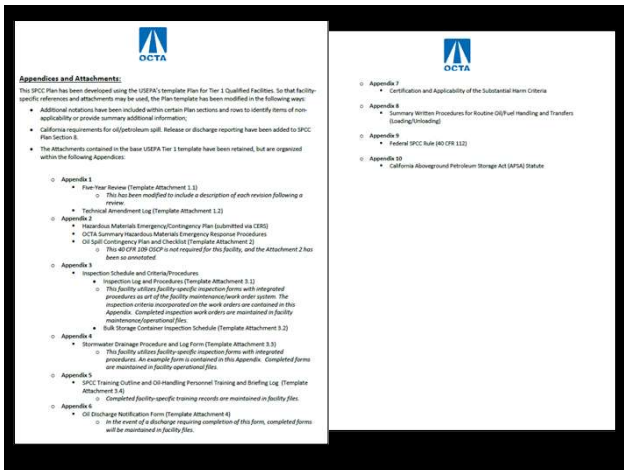
- Tier I eligibility is lost if facility increases single individual container capacity to > 5,000 gallons (112.6(a)(2))
  - Potential compliance issue… temporary storage counts!
  - Amend Plan Template immediately to reflect current conditions … then have a Tier II QF SPCC Plan, non-template self-certified Plan meeting T-II QF requirements or a PE-certified Plan within 6 months
- If total facility capacity increases to over 10,000 gallons:
  - Amend template immediately…and have a full PE certified Plan within 6 months

Completing Your SPCC Plan and Ensuring Rule & Plan Compliance

The US EPA Tier I Qualified Facility SPCC Plan Template (112.6(a)(3))

- 20 total pages (21 including cover)
  - Hard copy or MS Word (.doc)
    - ✦ I converted the template to a PDF with form fields
  - Latest revision (Ver 1-L, 3/18/2010)
- Contains:
  - Summary description of compliance requirements
  - Check-the-box compliance affirmations
  - Fill-in-the-blank narrative sections
  - Fill-in-the-table tables
  - Various blank log or recordkeeping forms
- Uncle Steve Hint o' the Day:
  - Make & use facility-specific forms and logs (along with other helpful Plan appendices)

CUPA — Completing a GREAT Tier I Qualified Facility SPCC Plan — Slide 55 of 156 — March 28, 2025 — ESCI EnviroServices, Inc.



OCTA

Appendices and Attachments:

This SPCC Plan has been developed using the USEPA's template Plan for Tier 1 Qualified Facilities. So that facility-specific references and attachments may be used, the Plan template has been modified in the following ways:

- Additional notations have been included within certain Plan sections and rows to identify items of non-applicability or provide summary additional information;
- California requirements for oil/petroleum spill. Release or discharge reporting have been added to SPCC Plan Section 8;
- The Attachments contained in the base USEPA Tier 1 template have been retained, but are organized within the following Appendices:

  - Appendix 1
    - Five-Year Review (Template Attachment 1.1)
      - *This has been modified to include a description of each revision following a review.*
    - Technical Amendment Log (Template Attachment 1.2)
  - Appendix 2
    - Hazardous Materials Emergency/Contingency Plan (submitted via CERS)
    - OCTA Summary Hazardous Materials Emergency Response Procedures
    - Oil Spill Contingency Plan and Checklist (Template Attachment 2)
      - *This 40 CFR 109 OSCP is not required for this facility, and the Attachment 2 has been so annotated*
  - Appendix 3
    - Inspection Schedule and Criteria/Procedures
      - Inspection Log and Procedures (Template Attachment 3.1)
        - *This facility utilizes facility-specific inspection forms with integrated procedures as art of the facility maintenance/work order system. The inspection criteria incorporated on the work orders are contained in this Appendix. Completed inspection work orders are maintained in facility maintenance/operational files.*
      - Bulk Storage Container Inspection Schedule (Template Attachment 3.2)
  - Appendix 4
    - Stormwater Drainage Procedure and Log Form (Template Attachment 3.3)
      - *This facility utilizes facility-specific inspection forms with integrated procedures. An example form is contained in this Appendix. Completed forms are maintained in facility operational files.*
  - Appendix 5
    - SPCC Training Outline and Oil-Handling Personnel Training and Briefing Log (Template Attachment 3.4)
      - *Completed facility-specific training records are maintained in facility files.*
  - Appendix 6
    - Oil Discharge Notification Form (Template Attachment 4)
      - *In the event of a discharge requiring completion of this form, completed forms will be maintained in facility files.*

OCTA

- Appendix 7
  - Certification and Applicability of the Substantial Harm Criteria
- Appendix 8
  - Summary Written Procedures for Routine Oil/Fuel Handling and Transfers (Loading/Unloading)
- Appendix 9
  - Federal SPCC Rule (40 CFR 112)
- Appendix 10
  - California Aboveground Petroleum Storage Act (APSA) Statute

Template Implementation & Required Backup

- Facilities should remember…
  - It's not just checking the boxes…
    - Must assure you keep the indicated required records
    - Must assure you are implementing what the box commits you to

Completing a GREAT Tier I Qualified Facility SPCC Plan

Cover Page

- Requirement to address & implement rule requirements
- Complete Sections I, II & III
  - Light blue sections
- Complete Section A (& B and/or C if appl.)
  - APSA = A only
- Complete various Attachments
  - Darker blue sections
    - Or use your own logs, checklists and/or forms

U.S. ENVIRONMENTAL PROTECTION AGENCY
TIER I QUALIFIED FACILITY SPCC PLAN TEMPLATE

Completing a GREAT Tier I Qualified Facility SPCC Plan

Cover Page Detail

All Tier I qualified facility self-certifiers must complete Sections I, II, and III. Additionally, the owner or operator of an:

- Onshore facility (excluding production) must complete Section A.
- Onshore oil production facility (excluding drilling and workover facilities) must complete Section B.
- Onshore oil drilling and workover facility must complete Section C.

Complete and include with your Plan the appropriate attachments. You should consider printing copies of the attachments for use in implementing the SPCC Plan (e.g. Attachment 3.1 - Inspection Log & Schedule; Attachment 4 - Discharge Notification Form).

To complete the template, check the box next to the requirement to indicate that it has been adequately addressed. Either write "N/A" in the column or check the box under the "N/A" column to indicate those requirements that are not applicable to the facility. Where a section requires a description or listing, write in the spaces provided (or attach additional descriptions if more space is needed).

Below is a key for the colors used in the section headers:

Sections I, II, and III:	Required for all Tier I qualified facilities
Section A:	Onshore facilities (excluding production)
Section B:	Onshore oil production facilities (excluding drilling and workover facilities)
Section C:	Onshore oil drilling and workover facilities
Attachments:	1 - Five Year Review and Technical Amendment Logs 2 - Oil Spill Contingency Plan and Checklist 3 - Inspections, Dike Drainage and Personnel Training Logs 4 - Discharge Notification Form

OSCP likely never required of a QF

After you have completed all appropriate sections, certify and date your Plan, and then implement it by the compliance date. If

Sections B and C would not typically apply to APSA facilities

Completing a GREAT Tier I Qualified Facility SPCC Plan

Cover Page Detail

- **Reminder about compliance and implementation… and spill reporting**

After you have completed all appropriate sections, certify and date your Plan, and then implement it by the compliance date. If your facility was in operation before August 16, 2002, and you do not already have a Plan, then implement this template immediately. Conduct inspections and tests in accordance with the written procedures that you have developed for your facility. You must keep with the SPCC Plan a record of these inspections and tests, signed by the appropriate supervisor or inspector, for a period of three years.

Do not forget to periodically review your Plan (at least once every five years) or to update it when you make changes to your facility. You must prepare amendments within six months of the facility change, and implement them as soon as possible, but not later than six months following preparation of any amendment.

In the event that your facility releases oil to navigable waters or adjoining shorelines, immediately call the National Response Center (NRC) at 1-800-424-8802. The NRC is the federal government's centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel.

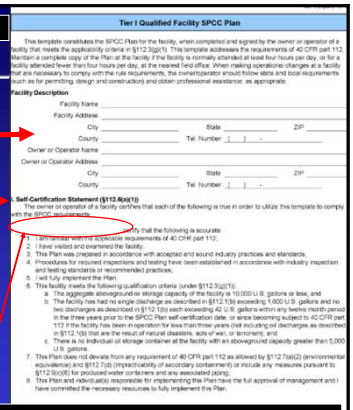
- *… and do not forget about CalOES/CUPA spill/release reporting*

CUPA Completing a GREAT Tier I Qualified Facility SPCC Plan Slide 51 of 156 March 26, 2025 ESCI ENVIROSERVICES, INC.

Page 1

Section I

- Facility address, etc.
- Self-certification Statement
  - Management needs to *read* & *understand* the certification elements!
  - This is a legal certification



Tier I Qualified Facility SPCC Plan

This template constitutes the SPCC Plan for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in §112.3(g)(1). This template addresses the requirements of 40 CFR part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design and construction) and obtain professional assistance, as appropriate.

Facility Description

Facility Name _____
Facility Address _____
City _____ State _____ ZIP _____
County _____ Tel. Number (___) ___-____
Owner or Operator Name _____
Owner or Operator Address _____
City _____ State _____ ZIP _____
County _____ Tel. Number (___) ___-____

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.

Who should the certifier be? Senior management level with authority to implement the Plan & commit necessary resources AND who has visited and is familiar with the facility. Beloved consultants or agents CANNOT certify.

Page 1 Certification Detail

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:

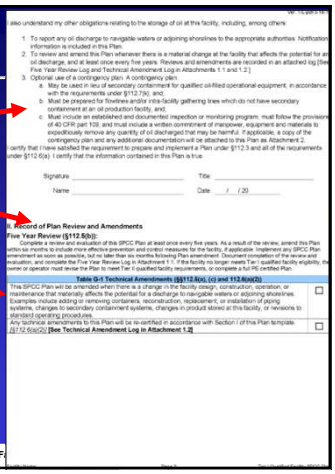
I _____ certify that the following is accurate:

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.

CUPA Completing a GREAT Tier I Qualified Facility SPCC Plan Slide 52 of 156 March 26, 2025 ESCI ENVIROSERVICES, INC.

Page 2

- Another certification statement
- Five-year Plan review
  - Also: Five Year Review Log in Attachment 1.1
- Technical amendment
  - Also: Technical Amendment Log in Attachment 1.2
- "Log" = required record



Page 2 Certification Detail

- The '40 CFR 109' Contingency Plan likely not required

Ver. 1-L-pdf-3-18-10

I also understand my other obligations relating to the storage of oil at this facility, including, among others:

1. To report any oil discharge to navigable waters or adjoining shorelines to the appropriate authorities. Notification information is included in this Plan.
2. To review and amend this Plan whenever there is a material change at the facility that affects the potential for an oil discharge, and at least once every five years. Reviews and amendments are recorded in an attached log [See Five Year Review Log and Technical Amendment Log in Attachments 1.1 and 1.2.]
3. Optional use of a contingency plan. A contingency plan:
   a. May be used in lieu of secondary containment for qualified oil-filled operational equipment, in accordance with the requirements under §112.7(k), and;
   b. Must be prepared for flowlines and/or intra facility gathering lines which do not have secondary containment at an oil production facility, and;
   c. Must include an established and documented inspection or monitoring program; must follow the provisions of 40 CFR part 109; and must include a written commitment of manpower, equipment and materials to expeditiously remove any quantity of oil discharged that may be harmful. If applicable, a copy of the contingency plan and any additional documentation will be attached to this Plan as Attachment 2.

I certify that I have satisfied the requirement to prepare and implement a Plan under §112.3 and all of the requirements under §112.6(a). I certify that the information contained in this Plan is true.

Signature _____ Title: _____

Name Date: / / 20

Completing a GREAT Tier I Qualified Facility SPCC Plan

Page 2 Plan Review & Amendment Detail

Section II

II. Record of Plan Review and Amendments

Five Year Review (§112.5(b)):

Complete a review and evaluation of this SPCC Plan at least once every five years. As a result of the review, amend this Plan within six months to include more effective prevention and control measures for the facility, if applicable. Implement any SPCC Plan amendment as soon as possible, but no later than six months following Plan amendment. Document completion of the review and evaluation, and complete the Five Year Review Log in Attachment 1.1. If the facility no longer meets Tier I qualified facility eligibility, the owner or operator must revise the Plan to meet Tier II qualified facility requirements, or complete a full PE certified Plan.

Table G-1 Technical Amendments (§§112.5(a), (c) and 112.6(a)(2))

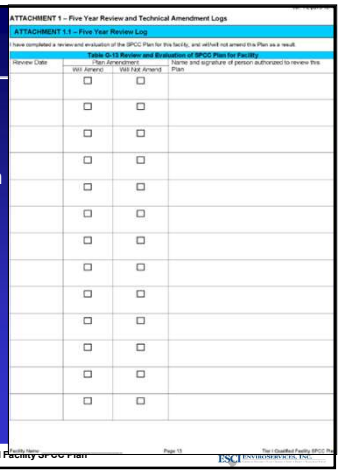
This SPCC Plan will be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects the potential for a discharge to navigable waters or adjoining shorelines. Examples include adding or removing containers, reconstruction, replacement, or installation of piping systems, changes to secondary containment systems, changes in product stored at this facility, or revisions to standard operating procedures.	☐
Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template. *[§112.6(a)(2)]* **[See Technical Amendment Log in Attachment 1.2]**	☐

- Text boxes (& 'Tables') state the rule requirements
  - And reference any required records (and attachments)
  - Check boxes are your affirmation of compliance

Completing a GREAT Tier I Qualified Facility SPCC Plan

Page 13

- Attachment 1.1 Five Year Review Log
  - Don't need to wait five years to review the Plan
  - Should review your facility, tanks, equipt., operations, inspection results, procedures, compliance program, etc. … in addition to the Plan document itself
  - Should keep notes of results of the reviews


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	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
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	☐	☐	
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	☐	☐	

Page 13 (Attachment 1.1) Five Year Review Log Detail

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ATTACHMENT 1 – Five Year Review and Technical Amendment Logs

ATTACHMENT 1.1 – Five Year Review Log

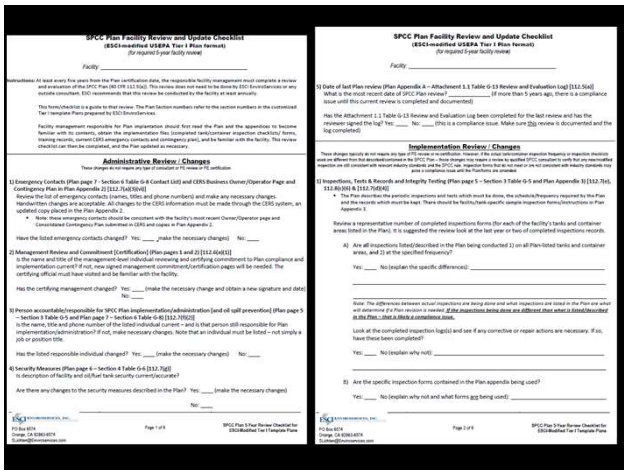
I have completed a review and evaluation of the SPCC Plan for this facility, and will/will not amend this Plan as a result.

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	
	☐	☐	
	☐	☐	
	☐	☐	

Who can sign the review? Can be anyone who was authorized by facility management to review the Plan

- Recommended: A separate set of notes detailing the review and the results of the reviews


SPCC Plan Facility Review and Update Checklist
(ESCI-modified USEPA Tier I Plan format)
(for required 5-year facility review)

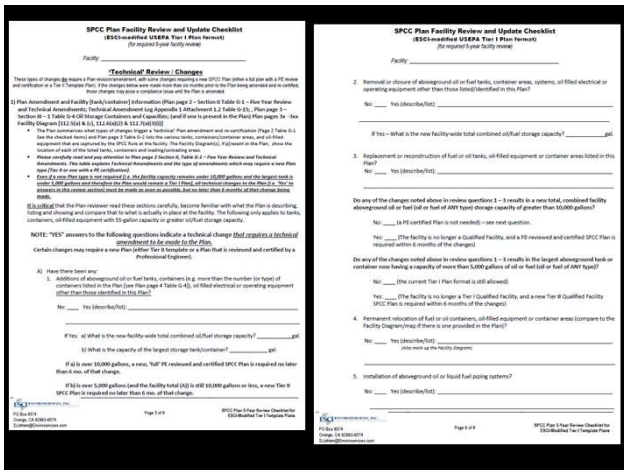
Facility: _____

Administrative Review / Changes

SPCC Plan Facility Review and Update Checklist
(ESCI-modified USEPA Tier I Plan format)
(for required 5-year facility review)

Facility: _____

Implementation Review / Changes


SPCC Plan Facility Review and Update Checklist
(ESCI-modified USEPA Tier I Plan format)
(for required 5-year facility review)

Facility: _____

'Technical' Review / Changes

These types of changes do require a Plan revision/amendment, with some changes requiring a new SPCC Plan (either a full plan with a PE review and certification or a Tier I Template Plan). If the changes below were made more than six months prior to the Plan being amended and re-certified, those changes may pose a compliance issue until the Plan is amended.

1) Plan Amendment and Facility (tank/container) Information (Plan page 2 – Section II Table G-1 – Five Year Review and Technical Amendments; Technical Amendment Log Appendix 1 Attachment 1.2 Table G-1⅝ ; Plan page 3 – Section III – 1 Table G-4 Oil Storage Containers and Capacities; (and if one is present in the Plan) Plan pages 3a –Sxx Facility Diagram [112.5(a) & (c), 112.6(a)(2) & 112.7(a)(3)(i)]

- The Plan summarizes what types of changes trigger a 'technical' Plan amendment and re-certification (Page 2 Table G-1 – see the checklist items) such as changes to the facility design, construction, operation, or maintenance of containers/container areas, and oil-filled equipment that could affect a discharge. The Facility Diagram(s), if present in the Plan, show the location of each of the tanks, containers and loading/unloading areas.
- *Please carefully read and pay attention to Plan page 2 Section II, Table G-1 – Five Year Review and Technical Amendments. This table explains Technical Amendments and the type of amendments which may require a new Plan type (Tier II or one with a PE certification).*
- *Even if a new Plan type is not required (i.e. the facility capacity remains under 10,000 gallons and the largest tank is under 5,000 gallons and therefore the Plan would remain a Tier I Plan), all technical changes to the Plan (i.e. 'Yes' to answers in this review section) must be made as soon as possible, but no later than 6 months of that change being made.*

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

NOTE: "YES" answers to the following questions indicate a technical change *that requires a technical amendment to be made to the Plan.*

Certain changes may require a new Plan (either Tier II template or a Plan that is reviewed and certified by a Professional Engineer).

A) Have there been any:

1. Additions of aboveground oil or fuel tanks, containers (e.g. more than the number (or type) of containers listed in the Plan [see Plan page 4 Table G-4]), oil-filled electrical or operating equipment other than those identified in this Plan?

No: ____ Yes (describe/list): _____

If Yes: a) What is the new facility-wide total combined oil/fuel storage capacity? _____gal.

b) What is the capacity of the largest storage tank/container? _____gal.

If a) is over 10,000 gallons, a new, 'full' PE reviewed and certified SPCC Plan is required no later than 6 mo. of that change.

If b) is over 5,000 gallons (and the facility total (a)) is still 10,000 gallons or less, a new Tier II SPCC Plan is required no later than 6 mo. of that change.

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Orange, CA 92863-8574
[redacted]

Page 5 of 9

SPCC Plan 5-Year Review Checklist for ESCI-Modified Tier I Template Plans

SPCC Plan Facility Review and Update Checklist
(ESCI-modified USEPA Tier I Plan format)
(for required 5-year facility review)

Facility: _____

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

No: ____ Yes (describe/list): _____

If Yes – What is the new facility-wide total combined oil/fuel storage capacity? _____gal.

3. Replacement or reconstruction of fuel or oil tanks, oil-filled equipment or container areas listed in this Plan?

No: ____ Yes (describe/list): _____

Do any of the changes noted above in review questions 1 – 3 results in a new total, combined facility aboveground oil or fuel (oil or fuel of ANY type) storage capacity of greater than 10,000 gallons?

No: ____ (a PE-certified Plan is not needed) – see next question.

Yes: ____ (The facility is no longer a Qualified Facility, and a PE-reviewed and certified SPCC Plan is required within 6 months of the changes)

Do any of the changes noted above in review questions 1 – 3 results in the largest aboveground tank or container now having a capacity of more than 5,000 gallons of oil or fuel (oil or fuel of ANY type)?

No: ____ (the current Tier I Plan format is still allowed)

Yes: ____ (The facility is no longer a Tier I Qualified Facility, and a new Tier II Qualified Facility SPCC Plan is required within 6 months of the changes)

4. Permanent relocation of fuel or oil containers, oil-filled equipment or container areas (compare to the Facility Diagram/map if there is one provided in the Plan)?

No: ____ Yes (describe/list): _____
(Also mark up the Facility Diagram)

5. Installation of aboveground oil or liquid fuel piping systems?

No: ____ Yes (describe/list): _____

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[redacted]

Page 6 of 9

SPCC Plan 5-Year Review Checklist for ESCI-Modified Tier I Template Plans

Page 14

- **Attachment 1.2 Technical Amendment Log**
  - Must be used for 'technical amendments'
    - ✦Ref the Table G-1 Technical Amendment criteria on Page 2
  - Should also log any administrative (non-technical) amendments

ATTACHMENT 1.2 – Technical Amendment Log

Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template.

Table G-1⅝ Description and Certification of Technical Amendments

Review Date	Description of Technical Amendment	Name and signature of person certifying this technical amendment

More detail on Technical Amendments and this Log shortly…

CUPA

Completing a GREAT Tier I Qualified

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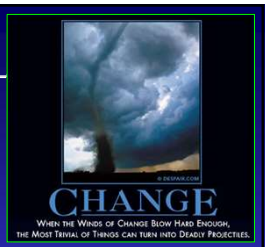
Facility Name

Page 14

Tier I Qualified Facility SPCC Plan

Technical Changes



- 40 CFR 112.5(a) [and 112.6(a)(2)]: The SPCC Plan must be amended for any changes in:
  - Design, Construction, Operation, or Maintenance
  - …that materially affects the potential for oil discharge into navigable waters
  - These are known as 'technical' amendments or amendments
- The Plan must be amended within 6 months of the occurrence of the change
  - Including facility review & recertification & documentation
- Actual amendment/change must be implemented ASAP
  - But no later than 6 months after amendment

CUPA

Completing a GREAT Tier I Qualified Facility SPCC Plan

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Technical Change Examples

- Addition or removal of tanks or containers
  - You have flexibility with portable containers if you write your Plan the right way!
- Replacement, reconstruction, or relocation of tanks & containers
  - ✦Again – flexibility for portable tanks & containers
- Reconstruction, replacement, or installation of piping systems
- Construction or demolition that might alter secondary containment structures
- Changes in type of oil stored/used
  - If it could impact navigable water discharge threat

Completing a GREAT Tier I Qualified Facility SPCC Plan
Slide 87 of 156 March 26, 2025

Technical Change?

Temporary tank brought in?
...For how long? ...Documentation?

Replacement tanks... or original installation?

Completing a GREAT Tier I Qualified Facility SPCC Plan
Slide 88 of 156 March 26, 2025

Technical Change?

# of drums change?
Drum contents change?
Drum location change?
...What does the Plan say...and how does it say it?
Is there inherent flexibility (example shortly)?

Portable or stationary?
...What does the Plan say...and how does it say it?

NUTS!! The tank was right here!!

Completing a GREAT Tier I Qualified Facility SPCC Plan
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Technical Change?

Change one hydrant system to supply Jet-A vs 100LL AvGas?

Completing a GREAT Tier I Qualified Facility SPCC Plan

Loss of Tier I Qualified Facility Eligibility Due to Technical Changes? *A Reminder*

- Tier I eligibility is lost if facility increases single individual container capacity to > 5,000 gallons
  - Amend your Plan immediately to reflect current conditions … then have a 'regular' self-certified SPCC Plan completed within 6 months
    - ✦There is a California-developed OSFM SPCC Plan Template for Tier II Qualified Facilities
    - ✦More extensive requirements than for Tier I QFs
- If total facility capacity increases to over 10,000 gallons:
  - Amend template immediately…and have a full PE reviewed & certified Plan within 6 months

Completing a GREAT Tier I Qualified Facility SPCC Plan

Page 14 (Attachment 1.2) Technical Amendment Log Detail

- Must recertify entire Plan (new Page 1 & 2) and all technical amendments
  - Plus sign this page

ATTACHMENT 1.2 – Technical Amendment Log

Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template.

Table G-15 Description and Certification of Technical Amendments

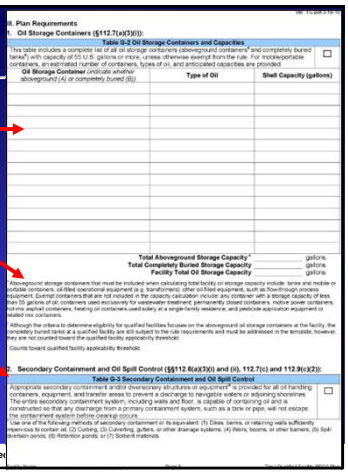
Review Date	Description of Technical Amendment	Name and signature of person certifying this technical amendment

This Log must be signed by the management person/level who first certified (and/or is recertifying) the entire Plan

Page 3

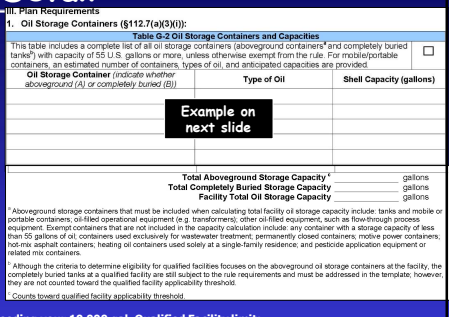
Section III

- G-2: List of tanks, containers, equipment & oil type
  - Note: all oil types
  - And instructions/ clarifications
- G-3: Description of requirements for secondary containment & oil spill controls
  - And affirmation of compliance


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* and completely buried tanks*) 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)
Total Aboveground Storage Capacity* gallons
Total Completely Buried Storage Capacity gallons
Facility Total Oil Storage Capacity gallons
2. Secondary Containment and Oil Spill Control (§§112.6(a)(2)(i) and (ii), 112.7(c) and 112.8(c)(2)):
Table G-3 Secondary Containment and Oil Spill Control

Page 3 List of Oil Storage Container Detail

- Include
  - Tanks
  - Containers
    - Including drums & IBCs
  - Oil filled equipment
    - Hydraulic systems
    - Heat transfer systems, etc.
  - USTs
- Flexibility!
  - Without exceeding your 10,000 gal. Qualified Facility limit:
  - Estimate max. number of portable containers and anticipated total capacity
  - Oil types: general type of oil… not specific grades or brands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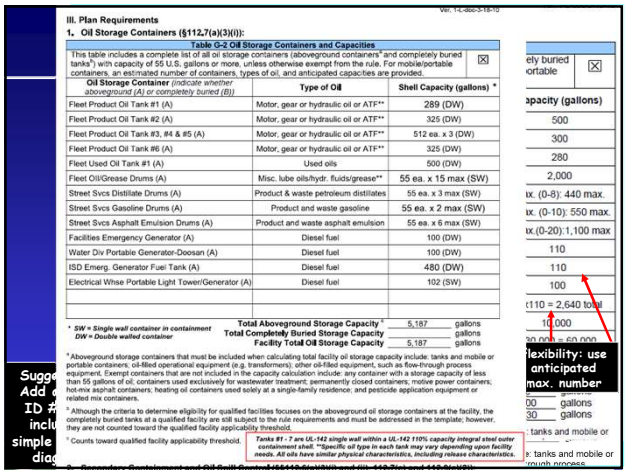
Oil Storage Container (indicate whether aboveground (A) or completely buried (B))
Type of Oil
Shell Capacity (gallons)
Example on next slide
Total Aboveground Storage Capacity* gallons
Total Completely Buried Storage Capacity gallons
Facility Total Oil Storage Capacity gallons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Oil Storage Container (indicate whether aboveground (A) or completely buried (B))	Type of Oil	Shell Capacity (gallons) *
Fleet Product Oil Tank #1 (A)	Motor, gear or hydraulic oil or ATF**	289 (DW)
Fleet Product Oil Tank #2 (A)	Motor, gear or hydraulic oil or ATF**	325 (DW)
Fleet Product Oil Tank #3, #4 & #5 (A)	Motor, gear or hydraulic oil or ATF**	512 ea. x 3 (DW)
Fleet Product Oil Tank #6 (A)	Motor, gear or hydraulic oil or ATF**	325 (DW)
Fleet Used Oil Tank #1 (A)	Used oils	500 (DW)
Fleet Oil/Grease Drums (A)	Misc. lube oils/hydr. fluids/grease**	55 ea. x 15 max (SW)
Street Svcs Distillate Drums (A)	Product & waste petroleum distillates	55 ea. x 3 max (SW)
Street Svcs Gasoline Drums (A)	Product and waste gasoline	55 ea. x 2 max (SW)
Street Svcs Asphalt Emulsion Drums (A)	Product and waste asphalt emulsion	55 ea. x 6 max (SW)
Facilities Emergency Generator (A)	Diesel fuel	100 (DW)
Water Div Portable Generator-Doosan (A)	Diesel fuel	100 (DW)
ISD Emerg. Generator Fuel Tank (A)	Diesel fuel	480 (DW)
Electrical Whse Portable Light Tower/Generator (A)	Diesel fuel	102 (SW)

* SW = Single wall container in containment
DW = Double walled container
Total Aboveground Storage Capacity 5,187 gallons
Total Completely Buried Storage Capacity gallons
Facility Total Oil Storage Capacity 5,187 gallons

Tanks #1 - 7 are UL-142 single wall within a UL-142 110% capacity integral steel outer containment shell. **Specific oil type in each tank may vary depending upon facility needs. All oils have similar physical characteristics, including release characteristics.

List of Tanks/Container Suggestion

- **On Table G-2:**
  - Add an ID code to each tank, container area, equipment or equipment area
- **Then create a simple facility diagram**
  - NOT an SPCC T-1 QF requirement!

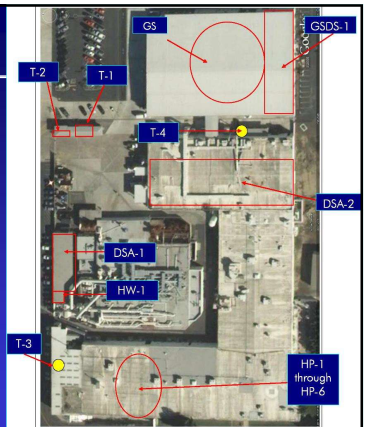

Figure 1 - SPCC Regulated Containers, Tanks, Equipment at Sample Class facility (see Table G-2)

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Page 3 Secondary Containment and Oil Spill Control Detail

2. Secondary Containment and Oil Spill Control (§§112.6(a)(3)(i) and (ii), 112.7(c) and 112.9(c)(2)):

Table G-3 Secondary Containment and Oil Spill Control	
Appropriate secondary containment and/or diversionary structures or equipment[a] is provided for all oil handling containers, equipment, and transfer areas to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs.	☐

[a] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

- **Deceptively simple section in the Template**
  - Simple wording of the requirement and a check box compliance affirmation
- **To comply: You must understand the two SPCC-related containment requirements**
  - Minimum 'general' containment: THIS Table G-3
  - 'Sized' containment: Table G-10 in Section A (page 9)
    - For bulk storage containers only

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Section A, Table G-10 (more later)

- **'Sized' containment requirement for bulk tanks & containers**
  - Stationary and portable
- **Discharge prevention positioning for portables and mobiles**

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-10 General Rule Requirements for Onshore Facilities		N/A
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)]*	☐	☐
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)]*	☐	☐
Secondary containment for the bulk storage containers (including mobile/portable oil storage containers) holds the capacity of the largest container plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). *[§112.6(a)(3)(ii)]*	☐	☐
If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following procedures will be implemented at the facility: *[§§112.8(c)(3) and 112.12(c)(3)]*		
• Bypass valve is normally sealed closed	☐	☐
• 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 under responsible supervision	☐	☐
• Adequate records of drainage are kept **[See Dike Drainage Log in Attachment 3.3]**	☐	☐
For completely buried metallic tanks installed on or after January 10, 1974 at this facility *[§§112.8(c)(4) and 112.12(c)(4)]*:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☐
• Regular leak testing is conducted.	☐	☐
For partially buried or bunkered metallic tanks *[§112.8(c)(5) and §112.12(c)(5)]*:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☐
Each aboveground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Scope and frequency of the inspections and inspector qualifications are in accordance with industry standards. Container supports and foundations are regularly inspected. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.8(c)(6) and §112.12(c)(6)(i)]*	☐	☐
Outsides of bulk storage containers are frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(c)(6) and 112.12(c)(6)]*	☐	☐
For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are documented. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.12(c)(6)(ii)]*	☐	☐

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Section A, Table G-10 (more later)

- 'Sized' containment requirement
  - Applies to bulk tanks & containers
    - Stationary and portable
  - Does NOT apply to mobile refuelers, oil filled equipment, piping, loading/unloading areas, oil handling areas
    - The 'general' containment (Table G-3 on Page 3) applies to those things

pressure and temperature. *[§§112.6(b)(1) and 112.12(b)(1)]*

Secondary containment for the bulk storage containers (including mobile/portable oil storage containers) holds the capacity of the largest container plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). *[§112.6(a)(3)(ii)]*	☐	☐

If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following

- Discharge prevention positioning

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Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided.

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)
Bulk Storage Containers and Mobile/Portable Containers[b]					
Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)[c]					
Piping, Valves, etc.					
Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)					
Other Oil-Handling Areas or Oil-Filled Equipment (e.g. flow-through process vessels at an oil production facility)					

More detail on this Table G-4 in a bit… First… let's talk about…..

More detail on this Table G-4 and how to complete in the Monday afternoon 'additional' class session (and in the hidden slides).

Same for secondary containment details… more detail in Monday afternoon additional, and in hidden slides.

[a] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.
[b] For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.
[c] For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

Facility Name: _____ Page 4 Tier I Qualified Facility SPCC Plan

CONTAINMENT

PREVENTING ESCAPE OF PROBLEMS SINCE 1790

Containment Summary: Two types of containment

- 'Sized' containment (40 CFR 112.6(a)(3)(ii)) *[Table G-10]*
  - For bulk tanks & containers (stationary & portable)
  - 100% containment of largest container capacity
    - Plus 'adequate' precipitation freeboard
  - Passive, engineered or constructed systems
- 'General' containment or other diversionary measures (40 CFR 112.7(c)) *[Table G-3]*
  - For oil-filled equipment, non-transportation tank trucks, piping and oil handling, loading, unloading & transfer areas
  - Sufficient to keep the 'most likely/typical failure mode' oil discharge from reaching navigable waters prior to clean up
  - May be active or passive in design, deployment or operation

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Potential Containment Issues

More detail & examples for secondary containment in Monday afternoon additional session, and in hidden slides.

- Secondary containment not obvious:
  - Mfr plate/UL listing not present or visible
  - Containment vents or monitor ports not visible or present
    - Many generator base tanks and older stand-alone tanks
- No obvious curbing or berms
- Assuming the curbing/berm is adequate
  - Need to verify capacity (USEPA's improved containment calculation tool)
  - Precipitation freeboard mis-estimated or calculated
    - Don't forget tank/container displacement
  - Not maintained (cracked, broken, etc.)
- No closable drainage valves
- Assumptions about O/W separators or door threshold drains as containment

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Containment Summary: Two types of containment

- 'Sized' containment (40 CFR 112.6(a)(3)(ii)) *[Table G-10]*
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- 'General' containment or other diversionary measures (40 CFR 112.7(c)) *[Table G-3]*
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  - May be active or passive in design, deployment or operation

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'Sized' Containment (aka secondary containment) for Bulk Tanks & Containers

Sized containment:

- Must contain the ***capacity*** of the largest single oil tank, compartment or container plus "sufficient freeboard" to contain precipitation
  - Intended to address *catastrophic failure* of bulk tanks & containers
  - Precipitation amount is a performance standard
- Methods are up to the facility
  - US EPA provides examples in the rule
    - **All are passive, constructed/engineered measures**
- Diked areas (walls and floor) must be sufficiently impervious to contain discharged oil until clean up (40 CFR 112.7(c))
  - Imperviousity is also a performance standard

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Capacity of Largest Container/Tank

Don't forget precipitation freeboard!

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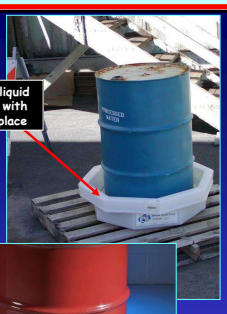
Need to Assure & Verify Proper Containment

61-gallon liquid capacity with drum in place



5-gallon liquid capacity with drum in place

11-gallon liquid capacity with drum in place

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Sized Containment
(40 CFR 112.6(a)(3)(ii) & Section A Table G-10

Required for

- **Fixed/stationary and portable tanks & containers**
  - ✦Fuel (gasoline/diesel), hydraulic and lube oil tanks
  - ✦Mineral oil & oil-containing cutting fluid tanks
  - ✦Generator base tanks (fixed and portable) if ≥ 55 gal.
  - ✦Generator day tanks if ≥ 55 gal.
  - ✦Waste/used oil & 'oil-based 'solvent tanks
  - ✦55-gallon oil, hydraulic fluid, solvent, fuel, oil-based paint, etc. drums
  - ✦Intermediate bulk containers (IBCs… 'totes') with oil, hydraulic fluid, oil-containing cutting fluids, etc.

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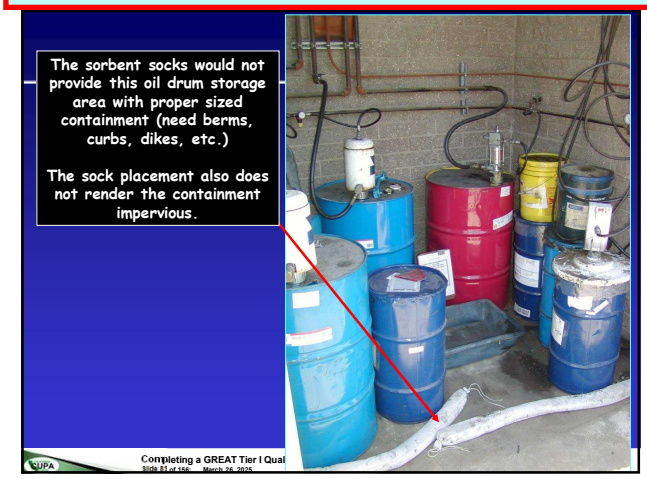

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Determining Precipitation Freeboard

- Only applicable to bulk tanks or containers
  - Not required for oil filled equipment, piping, or transfer areas
- Only if exposed to rain fall
  - … not required for integral double wall tanks, tanks under roof or inside buildings
    - ✦Sprinkler flow containment is a fire code requirement – not SPCC
- How much? Typically use:
  - 24 hours of a 25-year storm
  - 110% or 115% of largest tank or combined tank capacity

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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.

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Outdoor Coverage

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Does this appear to be adequate containment?

Should measure/calculate and verify this containment area meets sized requirements

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Double-Walled vs Single Walled Tanks

- Double walled (and/or tanks with integral secondary containment)
  - Meet required secondary containment capacity
  - Do not need to account for precipitation freeboard
  - Typically manufactured to various industry specs (UL-142, UL-2085, etc.)
    - ✦But some specs include both single and double wall tanks
  - May look similar to single walled tanks
    - ✦Not always obvious… so can not assume
  - Additional curbing may be present but not required
  - The interstice must be inspected or monitored

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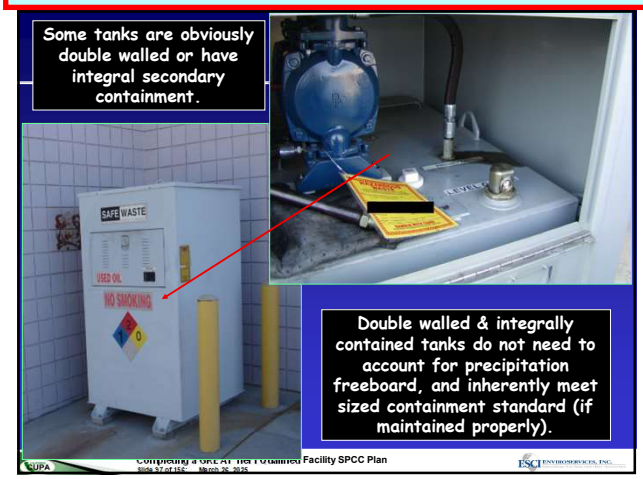

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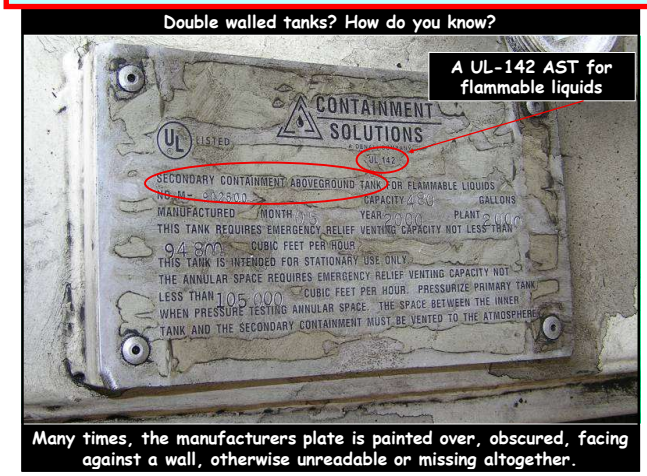

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"Monitor Port" indicates the presence of an interstitial space (and therefore a double walled tank).

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Day tanks for several emergency generators. Should verify capacity and whether single wall (& proper containment) or double wall.

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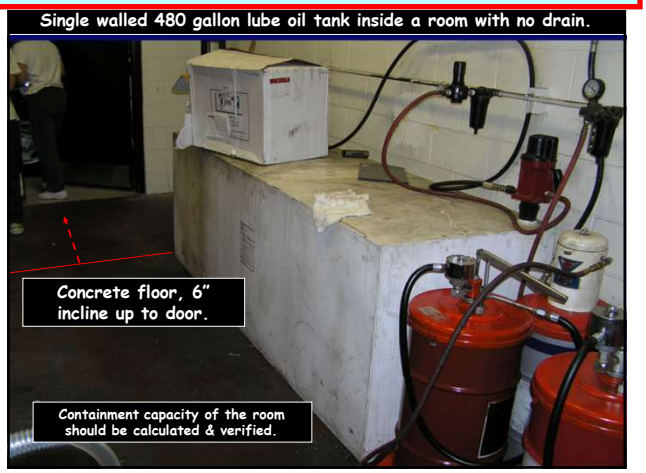

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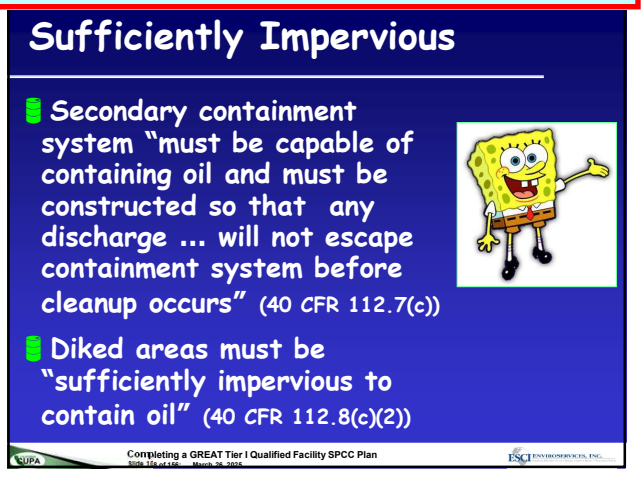

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Generator Base Tanks: Single vs Double Walled?

- Base fuel tanks on generator units (if > 55-gal cap.) are bulk storage tanks
  - May be single walled or double walled
  - Can range from very easy to very difficult to determine
    - ✦Not always visually apparent or fittings accessible
    - ✦Not always stated on manufacturers plate or other info
    - ✦Often was optional equipment from manufacturer
      - May be no record whether the option was selected
    - ✦Fuel tank serial numbers not always visible or readable
    - ✦Manufacturer may be out of business

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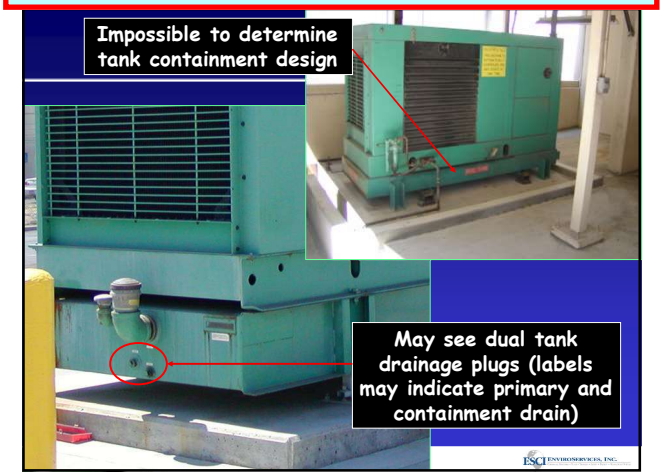

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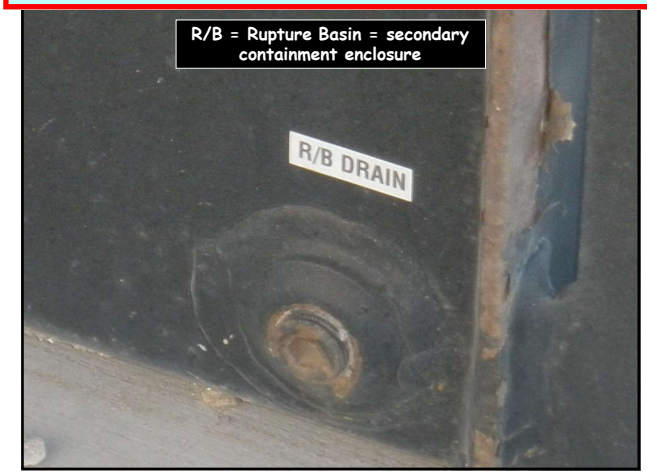

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'General' Containment or Diversionary Measures for All Other Areas & Equipt.

- 40 CFR 112.7(c) requirements for general oil handling areas & equipment are not the same as requirements for bulk tanks & containers
  - A much broader, performance-oriented requirement
  - Bulk tanks & oil-handling may be co-located at the facility, and have combined requirements and methods
- General petroleum-handling areas of the tank facility and specific equipment include:
  - Oil handling and transfer areas (including piping)
  - Loading/unloading areas
  - Oil-filled manufacturing, operational & electrical equipment

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Transfer (& Loading/Unloading) Areas

- Activities that occur within transfer or loading areas include:
  - Unloading fuel from a truck to a bulk fuel tank
  - Loading oil into a vehicle from a dispenser
  - Loading fuel from a mobile refueler into an airplane or other vehicle
  - Loading lubricating oil from a truck into equipment
  - Transferring fuel from a drum onto a generator base tank
  - Unloading and moving drums and totes on a forklift

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General Containment or Diversionary Means
(40 CFR 112.6(a)(3)(i), 112.7(c) & Table G-3

1. To prevent a discharge in harmful quantities to navigable water
2. Must only address the typical failure mode and most likely quantity of oil that would be discharged
3. Entire containment 'system' including walls and floor must be
   - Capable of containing oil
   - Constructed so that any discharge from primary containment will not escape before clean-up occurs

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General Containment Criteria

40 CFR 112.7(c)

1. To prevent a discharge in harmful quantities to navigable water
   - Harmful = enough oil to cause a sheen upon the water or adjoining shoreline
   - Navigable water = 'most' storm water systems (*very* legally wonky)
     - Discharging into municipal storm water systems, creeks, rivers, ocean, many ephemeral streams
   - Is the public street curb leading to a nav. water?
     - Can be interpreted that way
       - But may be a legal determination

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General Containment Criteria

40 CFR 112.7(c)

- Is a storm swale or trench navigable water?
  - Usually not – until the spill reaches the actual drain… or drain outlet. But:
  - Per US EPA (40 CFR 112 Appx. C-III, 5.2)
    - Assumption is that once oil reaches a storm drain inlet, it will flow into the receiving navigable water… and
    - The time required for oil to travel through a storm drain or open concrete channel to navigable water is negligible and can be considered instantaneous

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General Containment Criteria

40 CFR 112.7(c)

2. Must only address the typical failure mode and most likely quantity of oil that would be discharged (from each equipt., type, area, activity, etc.)
   - Typical failure mode?
     - As determined/certified by the facility
     - Based on experience & research ([formal or informal], available data, professional, institutional / organizational experience or data, anecdotal, informal discussions, etc.)
     - Determination is subjective!
       - No standard or requirement for back up or supporting data, or level of research, or depth/breadth of review
       - Uses a 'common sense', reasonability 'test'

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Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided.

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[4]	Secondary containment capacity (gallons)
Bulk Storage Containers and Mobile/Portable Containers[3]					
Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)[5]					
Piping					
Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)					
Other Oil-Handling Areas or Oil-Filled Equipment (e.g. flow-through process vessels at an oil production facility)					

Table G-4 is where the failure mode and the potential discharge volume gets recorded

[4] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.
[5] For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.
For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

Facility Name: _____ Page 4 Tier I Qualified Facility SPCC Pla

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General Containment Criteria
40 CFR 112.7(c)

- **Every single possible failure mode?**
  - **No – not an exhaustive evaluation**
  - **Subjective… rule provides examples:**
    - "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)…"

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General Containment Criteria
40 CFR 112.7(c)

- **Most likely quantity that would be discharged?**
  - **As determined by the facility**
  - Based on experience (yours and others) & research
  - Determination is subjective
    - Facilities (and Plans) can assume that inspection & response procedures would be followed and a discharge detected per inspection or operational procedures…
      - whether they ARE in actual practice is a Plan implementation and CUPA inspection issue
- **Spill predictions (Table G-4… coming up)**
  - Plans must list / describe the various scenarios (failure modes, flow rates, volumes, direction)

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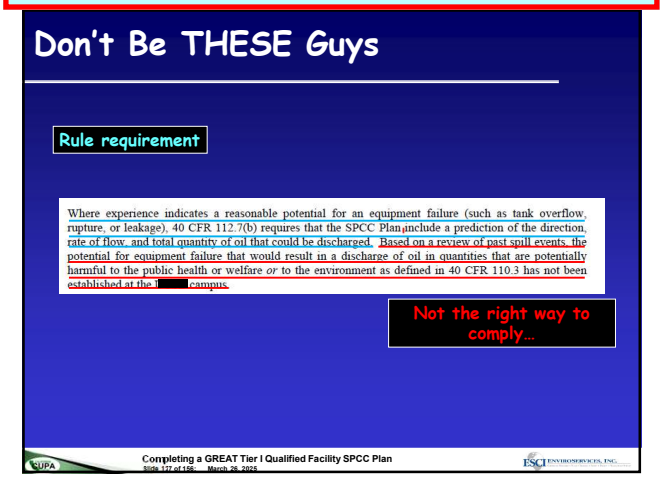
Don't Be THESE Guys

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 the [redacted] campus.

Not the right way to comply…



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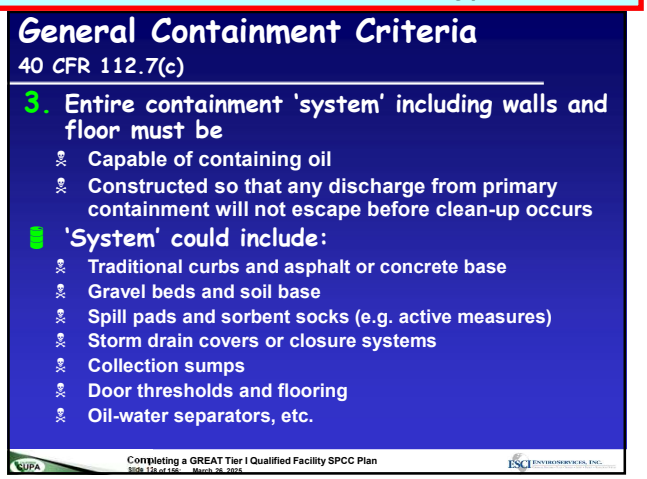
General Containment Criteria
40 CFR 112.7(c)

3. Entire containment 'system' including walls and floor must be
   - Capable of containing oil
   - Constructed so that any discharge from primary containment will not escape before clean-up occurs
- 'System' could include:
  - Traditional curbs and asphalt or concrete base
  - Gravel beds and soil base
  - Spill pads and sorbent socks (e.g. active measures)
  - Storm drain covers or closure systems
  - Collection sumps
  - Door thresholds and flooring
  - Oil-water separators, etc.



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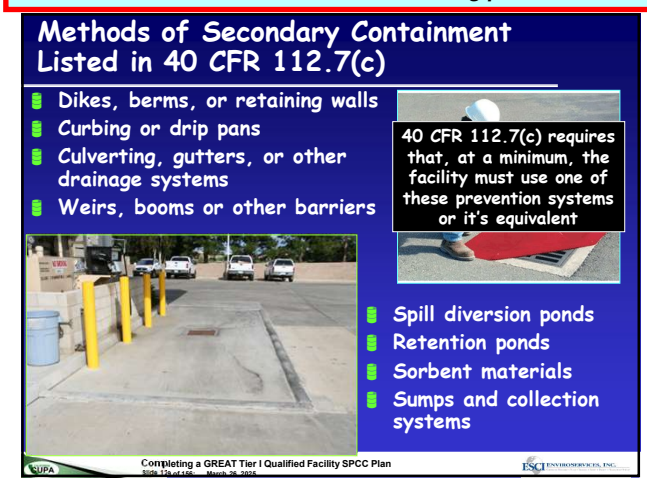
Methods of Secondary Containment Listed in 40 CFR 112.7(c)

- Dikes, berms, or retaining walls
- Curbing or drip pans
- Culverting, gutters, or other drainage systems
- Weirs, booms or other barriers

40 CFR 112.7(c) requires that, at a minimum, the facility must use one of these prevention systems or it's equivalent

- Spill diversion ponds
- Retention ponds
- Sorbent materials
- Sumps and collection systems



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"Qualified Oil-Filled Operational Equipment"?

- Speaking of general containment…

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I also understand my other obligations relating to the storage of oil at this facility, including, among others:

1. To report any oil discharge to navigable waters or adjoining shorelines to the appropriate authorities. Notification information is included in this Plan.
2. To review and amend this Plan whenever there is a material change at the facility that affects the potential for an oil discharge, and at least once every five years. Reviews and amendments are recorded in an attached log [See Five Year Review Log and Technical Amendment Log in Attachments 1.1 and 1.2.]
3. Optional use of a contingency plan. A contingency plan:
   a. May be used in lieu of secondary containment for qualified oil-filled operational equipment in accordance with the requirements under §112.7(k), and;
   b. Must be prepared for flowlines and/or intra facility gathering lines which do not have secondary containment at an oil production facility, and;
   c. Must include an established and documented inspection or monitoring program; must follow the provisions of 40 CFR part 109; and must include a written commitment of manpower, equipment and materials to expeditiously remove any quantity of oil discharged that may be harmful. If applicable, a copy of the contingency plan and any additional documentation will be attached to this Plan as Attachment 2.

I certify that I have satisfied the requirement to prepare and implement a Plan under §112.3 and all of the requirements under §112.6(a). I certify that the information contained in this Plan is true.

Signature _____ Title: _____

Name _____ Date: ___/___/ 20___

Completing a GREAT Tier I Qualified Facility SPCC Plan

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"Qualified Oil-Filled Operational Equipment" (40 CFR 112.7(k))?

- Definition and applicability commonly misunderstood
- Most facilities likely meet (k)(1)
- Think about all the general containment methods…and the likely release volume/mode… and then decide:
- Is the 112.20 FRP or the 109 OSCP *really* a better, cheaper, easier option?

(k) *Qualified Oil-filled Operational Equipment.* The owner or operator of a facility with oil-filled operational equipment that meets the qualification criteria in paragraph (k)(1) of this sub-section may choose to implement for this qualified oil-filled operational equipment the alternate requirements as described in paragraph (k)(2) of this sub-section in lieu of general secondary containment required in paragraph (c) of this section.

(1) *Qualification Criteria—Reportable Discharge History:* The owner or operator of a facility that has had no single discharge as described in § 112.1(b) from any oil-filled operational equipment exceeding 1,
from any oil-filled operat
month period in the three
subject to this part if the
oil discharges as described in § 112.1(b) that are the result of natural disasters, acts of war or terrorism); and

(2) *Alternative Requirements to General Secondary Containment.* If secondary containment is not provided for qualified oil-filled operational equipment pursuant to paragraph (c) of this section, the owner or operator of a facility with qualified oil-filled operational equipment must:

(i) Establish and document the facility procedures for inspections or a monitoring program to detect equipment failure and/or a discharge; and

(ii) Unless you have submitted a response plan under § 112.20, provide in your Plan the following:

(A) An oil spill contingency plan following the provisions of part 109 of this chapter.

(B) A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

Completing a GREAT Tier I Qualified Facility SPCC Plan

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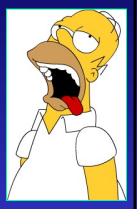
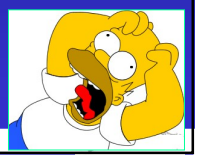
Passive vs. Active Containment Measures

- Allowed to use active and/or passive containment measures to prevent a discharge
  - Passive measures are generally viewed by US EPA as being more reliable
  - Selection is up to facility owner/operator
    - ✦Internal and agency inspections should verify presence and implementation
      - E.g. well stocked and located spill kits, trained and aware employees, well managed sorbent pads and trays, etc.



- Passive measures are permanent installations and do not require deployment or action by the owner or operator
- Active containment measures are those that require deployment or other specific action by the owner or operator



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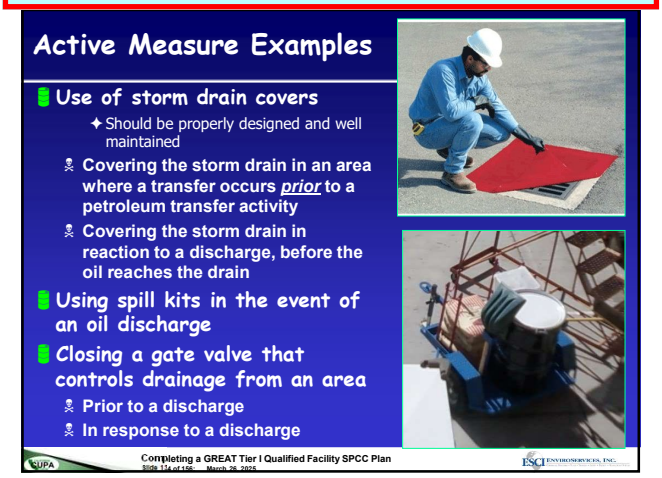

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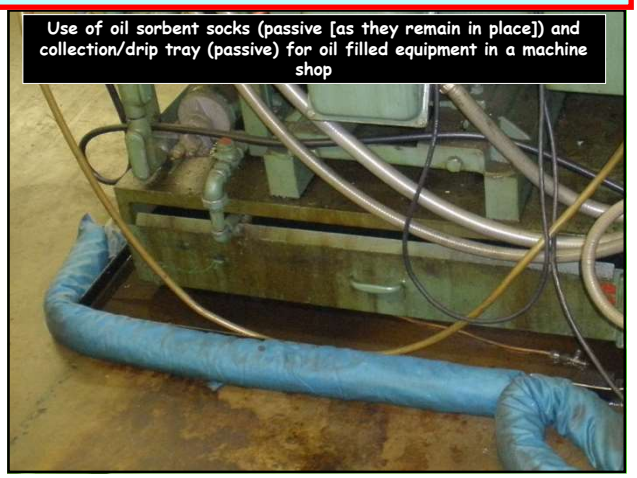

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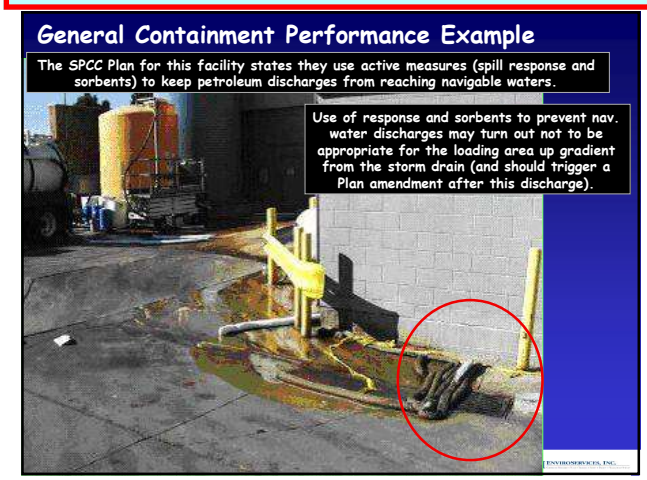

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For active measures using response… deployment speed is important

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This facility (and the Plan) stated they use spill kits and response during generator tank filling operations.
This would be in apparent compliance with 40 CFR 112.7(c)

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Non-transportation related tank trucks (on-site mobile refueler) = general containment for most likely spill

The Table G-4: Spill prediction

Completing a GREAT Tier I Qualified Facility SPCC Plan
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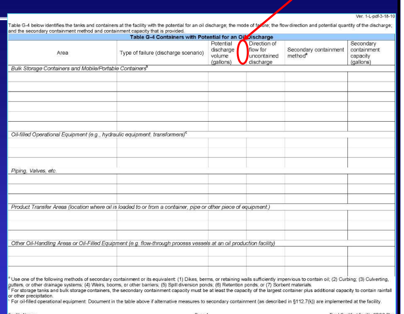
Page 4

Tier II and full PE Plans must also include Flow Rate (gpm or other)

- G-4: Spill prediction
  - i.e. 'Containers with the potential for oil discharge'
  - Covers
    - Bulk tanks & containers
    - Oil filled equipment
    - Piping & valves
    - Product transfer & loading/unloading areas
    - Overall oil handling areas



Completed sample in a minute…

Completing a GREAT Tier I Qualified Facility SPCC Plan
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Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided.

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)
Bulk Storage Containers and Mobile/Portable Containers[b]					
Oil-filled Operational Equipment (e.g., hydraulic equipment, transfor…					
Piping, Valves, etc.					
Product Transfer Areas (location where oil is loaded to or from a co…					
Other Oil-Handling Areas or Oil-Filled Equipment (e.g. flow-through…					

Include:
- Everything listed on Table G-2… and connected piping runs
- Areas where tanks, IBCs or drums are filled or emptied
- Areas where oil containers are moved or transported

Yes! You can combine similar areas or be somewhat generic.

Use additional pages if necessary (try the Word version of the Plan template for additional Table G-4s).

[a] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.
[b] For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.
[c] For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

Facility Name: ______________________ Page 4 Tier I Qualified Facility SPCC Plan

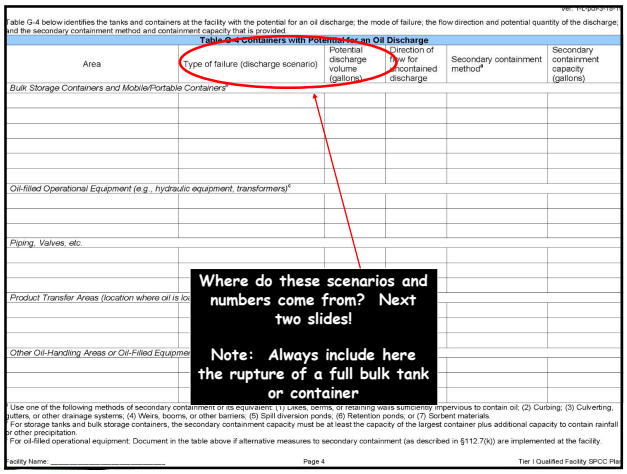

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Table G-4 Containers with Potential for an Oil Discharge

Area	Type of failure (discharge scenario)	Potential discharge volume (gallons)	Direction of flow for uncontained discharge	Secondary containment method[4]	Secondary containment capacity (gallons)
Bulk Storage Containers and Mobile/Portable Containers[5]					
Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)[6]					
Piping, Valves, etc.					
Product Transfer Areas (location where oil is lo					
Other Oil-Handling Areas or Oil-Filled Equipme					

Where do these scenarios and numbers come from? Next two slides!

Note: Always include here the rupture of a full bulk tank or container

[4] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.
[5] For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.
[6] For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

Facility Name: _____ Page 4 Tier I Qualified Facility SPCC Pla

Failure Modes Based on General Experience

- Typical failure mode/scenario?
  - Common modes/scenarios:
    - **Catastrophic failure** (always for bulk containers and tanks)
    - **Overfills**
    - **Piping connection leaks/weeps**
    - **Loading or unloading hose ruptures**
    - **Hose connection failures**
    - **Weeps/leaks from valves, fittings or gaskets**
    - **Weeps/leaks from small structural defects or damage**
    - **Portable tank/drum tip over during movement**
    - **Spearing IBCs with a forklift**

Potential Discharge Volume?

- List/describe a couple of various failure scenarios
  - Estimated / calculated discharge rate for each event or scenario
    - ✦ Calculated / estimated flow rates
      - **Fuel truck loading pump rate**
      - **Size of crack, hole or weep and likely release rate**
      - **Estimated time for discovery and response**

Can assume that inspection & response procedures would be followed (and all required supplies are present)… whether they ARE is an implementation and inspection issue

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Potential Discharge Volume?

- Likely quantity that would be discharged?
  - Based on experience & research (as before)
  - Determination is subjective (as before)
    - Not rocket science or a formal statistical analysis
  - e.g. Tank/container overfills & hose ruptures:
    - Est. flow rate x time to shut it down
      - Drums/IBCs: ~10 gpm x 30 sec. (0.5 min) = ~ 5 gallons
      - Fuel trucks = ~120 gpm x 30 sec. (0.5 min) = ~ 60 gallons
  - e.g. Drum / IBC handling (tip over or forklift spear)
    - ~25 gpm x 1 min = 25 gallons to 150 gallons
  - e.g. Mill or hydraulic press leak
    - ~ 1 – 10 gpm x 5 min = 1 gallon to 50 gallons

Potential Discharge Volume Based on A Little Math

- Catastrophic failure:
  - Full capacity amount
- Overfills:
  - (Rate of filling) x (Likely time to recognize and shut off flow)
- Loading or unloading hose ruptures:
  - (Rate of filling [pump rate]) x (Likely time to recognize & shut off flow) + (Volume remaining in hose)
- Hose connection failures:
  - (Rate of filling) x (Likely time to recognize & shut off flow) + (Volume remaining in hose)
- Piping connection leaks/weeps:
  - Consider pressure, diameter, time to notice and time to correct
- Weeps/leaks from valves, fittings or gaskets:
  - Consider pressure, diameter, time to notice and time to correct
- Weeps/leaks from small structural defects or damage:
  - Consider pressure, type/magnitude of defect, time to notice and time to correct
- Portable tank/drum tip over during movement:
  - Time and ability to re-orient container or re-cap
- Spearing drums or IBCs with a forklift:
  - Leave forks IN... small volume vs pull forks OUT... larger volume

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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?

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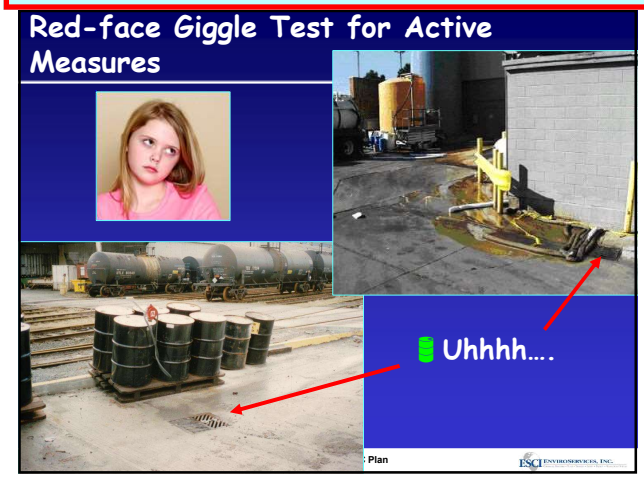

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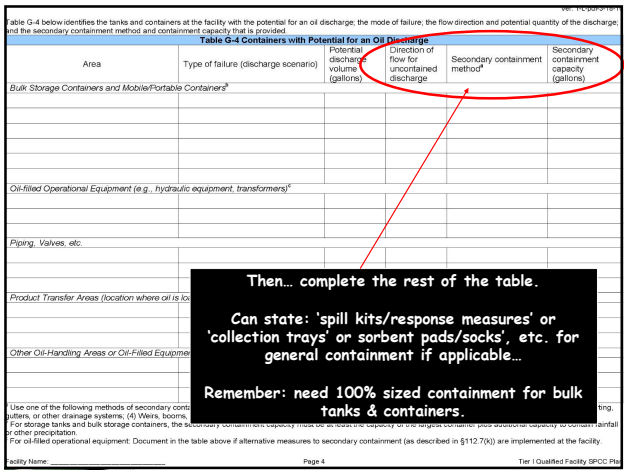
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Table G-4 Containers with Potential for an Oil Discharge

Area	Type of failure (discharge scenario)	Potential discharge volume (gallons)	Direction of flow for uncontained discharge	Secondary containment method[a]	Secondary containment capacity (gallons)
Bulk Storage Containers and Mobile/Portable Containers[b]					
Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)[c]					
Piping, Valves, etc.					
Product Transfer Areas (location where oil is lo					
Other Oil-Handling Areas or Oil-Filled Equipme					

Then… complete the rest of the table.

Can state: 'spill kits/response measures' or 'collection trays' or sorbent pads/socks', etc. for general containment if applicable…

Remember: need 100% sized containment for bulk tanks & containers.

Use one of the following methods of secondary conti… (1) Dikes, berms, or retaining walls; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, … ting, or other precipitation.
For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

Facility Name: _____ Page 4 Tier I Qualified Facility SPCC Pla

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 – 960	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 Pla

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Spill supplies ('DRIZIT') staged at the tank loading/unloading area.
Plan states typical failure mode, volume and rate is loading hose rupture with 60 gallons released (30 seconds to respond at 120 gpm pump rate).
Flow direction (per Plan) is down-gradient to the left.
Must evaluate whether the 1/3 barrel of 'DRIZIT' is sufficient, and whether other containment method(s) are used.

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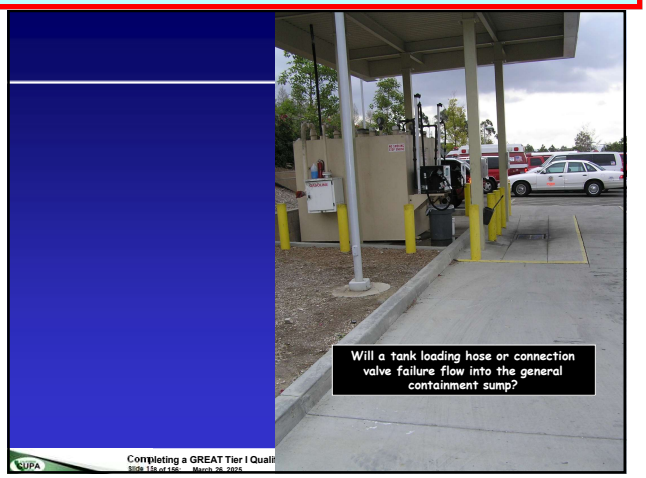

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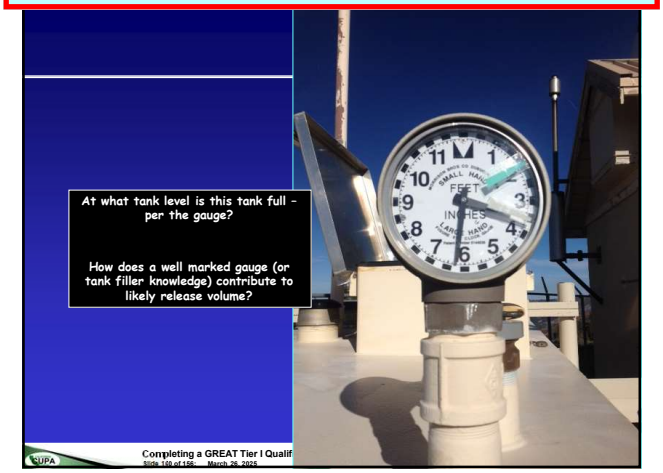

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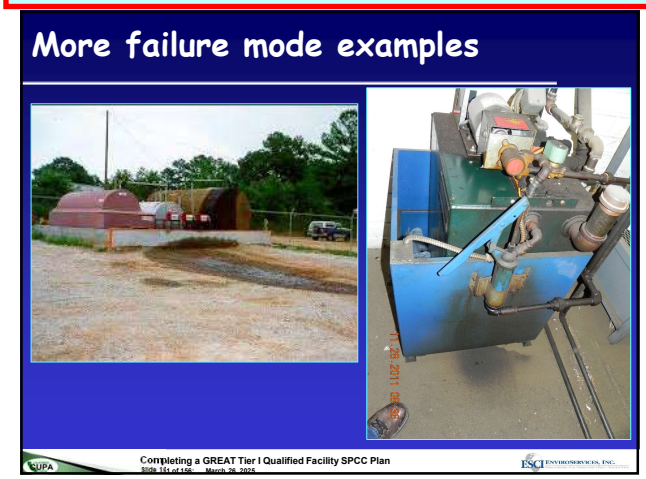

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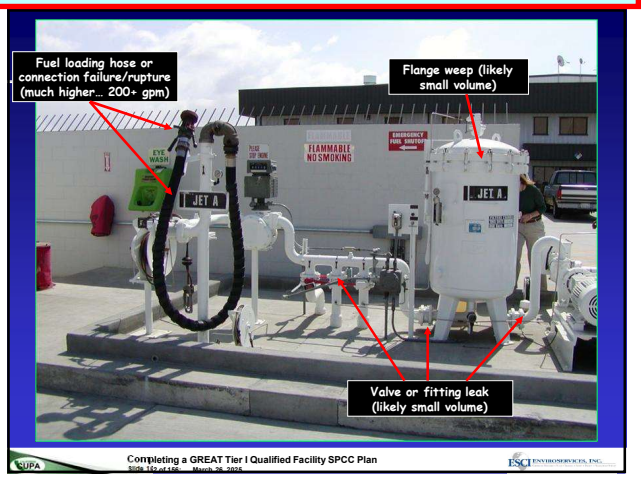

The Universally Sketchy Assumption

- Can assume that inspection & response procedures would be followed (and all required supplies are present)… whether they ARE is an implementation and inspection issue
  - ACTION!

Completing a GREAT Tier I Qualified Facility SPCC Plan

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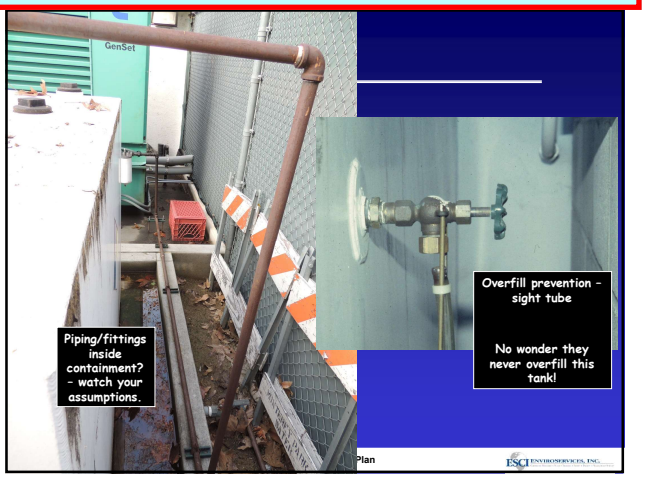

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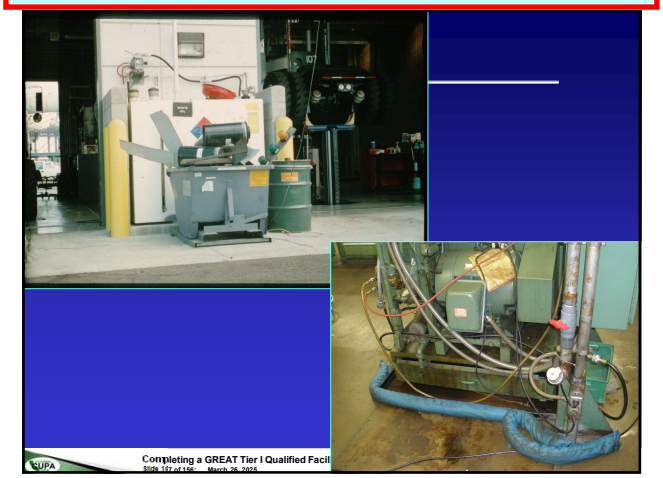

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Area	Type of failure (discharge scenario)	Potential discharge volume (gallons)	Direction of flow for uncontained discharge	Secondary containment method[a]	Secondary containment capacity (gallons)
Bulk Storage Containers and Mobile/Portable Containers[b]					
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 Pla

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I hate that table…..

Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided.

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[4]	Secondary containment capacity (gallons)
Bulk Storage Containers and Mobile/Portable Containers[3]					
Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)[5]					

See following pages

Spill Prediction (examples using my own format)

Table 6-2 Spill Prediction

Potential Event	Maximum Potential Release Volume (gallons)[1]	Maximum Potential Discharge Rate[2]	Direction of Flow[3]	Secondary Containment
Recycled/Recyclable Oil Tanks RO-T 1 through 5				
Failure of AST (collapse or puncture below liquid level)	1,900 max	Gradual to instantaneous	North via swales to o/w separator to infiltration area	Concrete secondary containment
Tank overfill	60	20 gal/min		
Piping failure	50	5 gal/min		
Loading or unloading hose failure	60	20 gal/min		
Used Oil Tank UO-T 2				

[1] As of January 2009 – Calif. OES became the California Emergency Management Agency.
[2] Maximum potential release volume based on the estimated time required to detect a release associated with the identified event and to shut off the flow or isolate the equipment multiplied by the maximum potential discharge rate for that event. Discharge time factors assume trained vendor and facility personnel following relevant procedures for managing leaks or spills, and leaks from operational equipment occurring during facility operational hours.
[3] Maximum potential discharge rate determined from engineering experience, pump rates as determined through experience or discussions with delivery or recycling vendors. Discharge volume factors assume trained vendor and facility personnel following relevant procedures for managing leaks or spills.
[4] Assumes containment breach – no matter how unlikely.

Potential Event	Maximum Potential Release Volume (gallons)	Maximum Potential Discharge Rate	Direction of Flow	Secondary Containment
#3 Oils Cones Box				
Failure of aboveground tank (collapse or puncture below product level)	500	Gradual to instantaneous	N to low spot in yard	Steel secondary containment
Tank overfill	5 to 50	5 gal/min	N to low spot in yard	Steel secondary containment; line inspection before use, & spill kit
Loading or unloading line failure	5 to 50	5 gal/min	N to low spot in yard	Partial secondary containment, line inspection before use, & spill kit
Fuels Area Tanks #4 and 5				
Failure of aboveground tank (collapse or puncture below product level)	330 - 550	Gradual to instantaneous	N to drainage ditch on highway	Secondary containment
Tank overfill	5 to 50	5 gal/min	N to drainage ditch on highway	Secondary containment
Loading or unloading line failure	5 to 50	5 gal/min	N to drainage ditch on highway	Partial secondary containment, line inspection before use, & spill kit
Fuels Area Tanks #6, 7, and 8				
Failure of aboveground tank (collapse or puncture below product level)	1,000 to 3,000	Gradual to instantaneous	N to drainage ditch on highway	Secondary containment
Tank overfill	5 to 50	5 gal/min	N to drainage ditch on highway	Secondary containment, fill procedures & spill kit
Loading or unloading line failure	5 to 50	5 gal/min	N to drainage ditch on highway	Partial secondary containment, line inspection before use, & spill kit
Fuel Trucks #9 and 10				
Failure of Tank on truck	55 to 750	Gradual to instantaneous	N to drainage ditch on highway (mobile variable locations)	Secondary containment on vehicle, spill kits
Tank overfill	5-50	5 gal /min	N to drainage ditch on highway (mobile)	Secondary containment on vehicle, spill kits
Loading or unloading line failure	1 to 500	5 gal/min	N to drainage ditch on highway (mobile)	Secondary containment on vehicle, line inspection before use & spill kits

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Table G-4 Containers with Potential for an Oil Discharge

Area/Container	Type of Failure/Discharge Scenario	Potential Discharge Volume (gallons)	Direction of Flow	Secondary Containment Method	Secondary Containment Capacity (gallons)
Bulk Storage Containers & Mobile/Portable Containers (including associated piping systems and tank loading areas)					
Fleet Product Oil Tanks # 1 - 6	Tank rupture	250	Out Fluid/Oil Room (or out piping within shop) and • Into shop and catch drains at roll-up doors, or • Out building to paved area then down to street and municipal storm drain	Double-wall tank	>250
	Piping rupture	1 – 25			
	Loading hose/connection failure during tank loading	1 – 25		Spill absorbents & active measures/spill response; roll-up door catch drains	Up to 30
Fleet Used Oil Tank	Tank rupture	500	Out Fluid/Oil Room (or out piping within shop) and • Into shop and catch drains at roll-up doors, or • Out building to paved area then down to street and municipal storm drain	Double-wall tank	>500
	Piping rupture	1 – 25			
	Loading hose/connection failure during tank loading or unloading	1 – 25		Spill absorbents & active measures/spill response; roll-up door catch drains	Up to 30
Fleet Oil/Grease Drums	Drum rupture	55	Into shop and catch drains at roll-up doors	Containment pallets or units	>55
	Spill during filling/transfer	1 - 10		Spill absorbents & active measures/spill response; roll-up door catches drains	Up to 30

Area/Container	Type of Failure/Discharge Scenario	Potential Discharge Volume (gallons)	Direction of Flow	Secondary Containment Method	Secondary Containment Capacity (gallons)
ISD Emergency Generator Fuel Tank	Tank rupture	250	West through fence to street and municipal storm drain	Double-wall tank	>480
	Piping rupture	1 – 25			
	Loading hose/connection failure during tank loading	1 – 25		Spill absorbents & active measures/spill response; roll-up door catch drains	Up to 30
Electrical Warehouse Portable Light Tower/Generator	Tank rupture	102	Into Warehouse then out door to paved area then down to street and municipal storm drain	Raised door/spill threshold at door	>150
	Loading hose/connection failure during tank loading	1 – 15		Spill absorbents & active measures/spill response; roll-up door catch drains	Up to 30
Facilities Emergency Generator	Tank rupture	100	South through fence to drainage swale then to municipal storm drain	Double-wall tank	>100
	Piping rupture	1 – 25			
	Loading hose/connection failure during tank loading	1 – 30		Spill absorbents & active measures/spill response; roll-up door catch drains	Up to 30
Water Division Portable Emergency Generator	Tank rupture	250	West through fence to drainage swale then to municipal storm drain	Double-wall tank	>110
	Loading hose/connection failure during tank loading	1 – 30		Spill absorbents & active measures/spill response; roll-up door catch drains	Up to 30
Street Services Fuel, Distillate & Asphalt Drums	Drum rupture	55	Into Conex unit then out Conex door shop to drainage swale then to municipal storm drain	Containment pallets or units	>55

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Page 5

- 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

Need a name and title here

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Related to Inspections: Pg 9 Section A, Table G-10 (more later)

- Associated bulk tank
- Section A provides mor
  - content or coverage of
  - & containers
    - The Page 5 Table G-5 insp
      procedures should include
      in Table G-10
  - Not applicable to oil filled
    areas, oil handling areas

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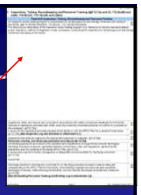
Page 5 Inspections & Testing Detail

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, 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)]*	☐

- Must have a written inspection/testing program in place
  - Narratively describe the program (see next slide)
  - Must have written procedures for inspections, testing and records (see slide following for an example)

Written Inspection/Testing Program and Procedures (Uncle Steve's recommendation)



- Example next… but in summary:
- Applies only to tanks & containers
  - Not oil filled equipment
- Make sure the inspection program description includes all tanks & containers
  - ✦ If the inspections are different for different tanks or containers (e.g. waste vs product) – then state so in the description
  - Description must include:
    1. Reference to the industry inspection standard(s) used
    2. Scope of the inspection program (i.e. what conditions or items are being inspected)
    3. Schedule of inspections (how frequently are they being done)
    4. Methods of inspection or test (how are the inspections conducted)
    5. Person conducting inspections or testing (who will perform the inspections and what are their qualifications)
    6. Records (describe the inspection recordkeeping)

Sample

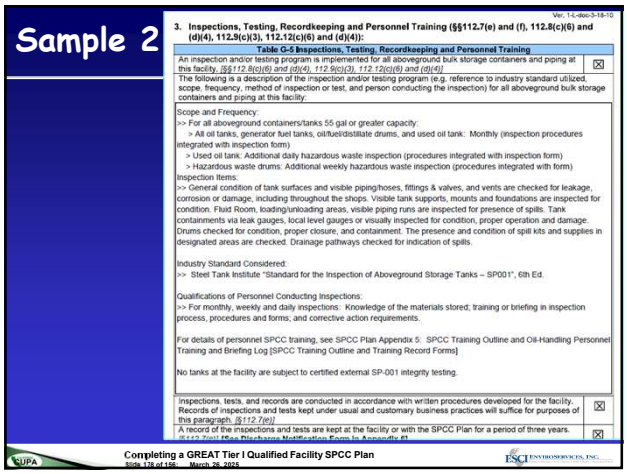
- YOUR program may be different!
  - Don't just blindly copy this sample
- … And obviously:
  - Implement as described!

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: Industry Standard Reference: Steel Tank Institute SP-001 (integrated into US EPA's Tier I SPCC Plan Template). Scope: Inspection of the following for damage, deterioration, corrosion, or visible oil discharges/accumulations: > 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). Schedule: > Weekly for hazardous waste oil drums > Monthly for all other tanks and drums > Within 7 days following any material repairs to tanks Method of Inspection or Test: Visual inspection by trained facility personnel using detailed inspection log sheet. Person Conducting Inspections or Testing: Designated facility personnel trained in the SPCC Plan; inspection/testing procedures, methods and scope; corrective action requirements; general recordkeeping and inspection record requirements. Records: 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 protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the con… A person who reports to … revention. *[§112.7(f)]*	☐ ☐

Sample for Class

Sample 2



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:

Scope and Frequency:
>> For all aboveground containers/tanks 55 gal or greater capacity:
> All oil tanks, generator fuel tanks, oil/fuel/distillate drums, and used oil tank: Monthly (inspection procedures integrated with inspection form)
> Used oil tank: Additional daily hazardous waste inspection (procedures integrated with inspection form)
> Hazardous waste drums: Additional weekly hazardous waste inspection (procedures integrated with form)

Inspection Items:
>> General condition of tank surfaces and visible piping/hoses, fittings & valves, and vents are checked for leakage, corrosion or damage, including throughout the shops. Visible tank supports, mounts and foundations are inspected for condition. Fluid Room, loading/unloading areas, visible piping runs are inspected for presence of spills. Tank containments via leak gauges, local level gauges or visually inspected for condition, proper operation and damage. Drums checked for condition, proper closure, and containment. The presence and condition of spill kits and supplies in designated areas are checked. Drainage pathways checked for indication of spills.

Industry Standard Considered:
>> Steel Tank Institute "Standard for the Inspection of Aboveground Storage Tanks – SP001", 6th Ed.

Qualifications of Personnel Conducting Inspections:
>> For monthly, weekly and daily inspections: Knowledge of the materials stored; training or briefing in inspection process, procedures and forms; and corrective action requirements.

For details of personnel SPCC training, see SPCC Plan Appendix 5: SPCC Training Outline and Oil-Handling Personnel Training and Briefing Log [SPCC Training Outline and Training Record Forms]

No tanks at the facility are subject to certified external SP-001 integrity testing.

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. ☒

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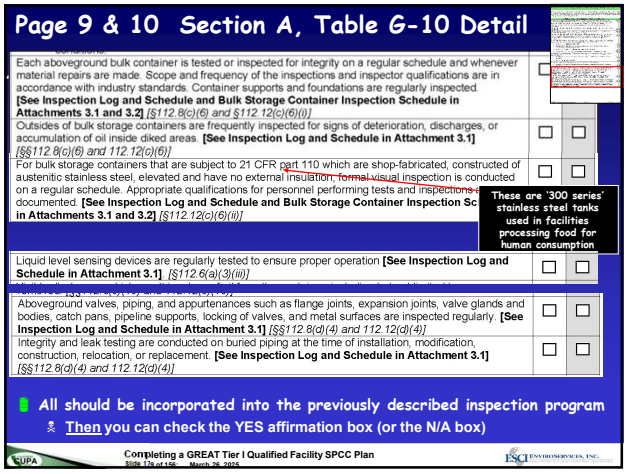
Page 9 & 10 Section A, Table G-10 Detail



Each aboveground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Scope and frequency of the inspections and inspector qualifications are in accordance with industry standards. Container supports and foundations are regularly inspected. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.8(c)(6) and §112.12(c)(6)(i)]*	☐	
Outsides of bulk storage containers are frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(c)(6) and 112.12(c)(6)]*	☐	☐
For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections ~~c~~ documented. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Sc in Attachments 3.1 and 3.2]** *[§112.12(c)(6)(ii)]*	☐	☐
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)]*	☐	☐
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. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☐	☐
Integrity and leak testing are conducted on buried piping at the time of installation, modification, construction, relocation, or replacement. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☐	☐

These are '300 series' stainless steel tanks used in facilities processing food for human consumption

- All should be incorporated into the previously described inspection program
  - Then you can check the YES affirmation box (or the N/A box)

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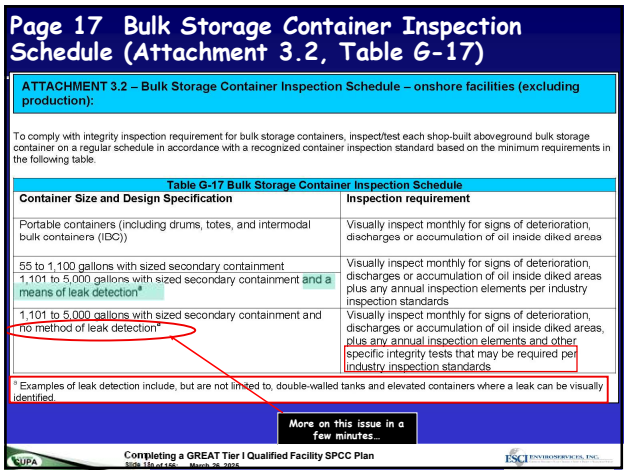
Page 17 Bulk Storage Container Inspection Schedule (Attachment 3.2, Table G-17)



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*	
1,101 to 5,000 gallons with sized secondary containment and no method of leak detection*	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

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

More on this issue in a few minutes...

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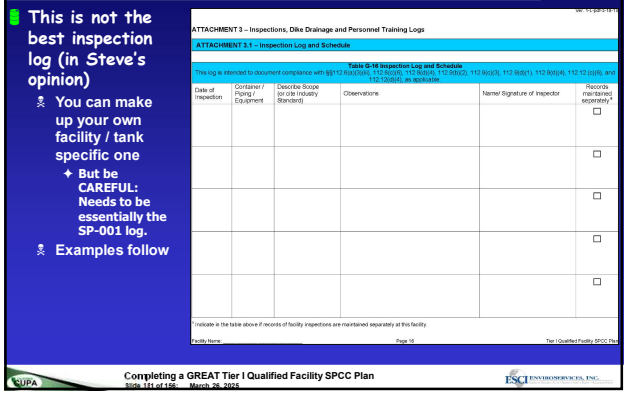
Page 16 Inspection Log and Schedule (Attachment 3.1, Table G-16)

- This is not the best inspection log (in Steve's opinion)
  - You can make up your own facility / tank specific one
    - But be CAREFUL: Needs to be essentially the SP-001 log.
  - Examples follow


ATTACHMENT 3 – Inspections, Dike Drainage and Personnel Training Logs

ATTACHMENT 3.1 – Inspection Log and Schedule

Table G-16 Inspection Log and Schedule

This log is intended to document compliance with §§112.8(c)(6), 112.8(c)(8), 112.8(d)(4), 112.8(h)(2), 112.9(c)(3), 112.9(d)(1), 112.9(d)(4), 112.12.(c)(6), and 112.12(d)(4), as applicable

Date of Inspection	Container / Piping / Equipment	Describe Scope (or cite Industry Standard)	Observations	Name/ Signature of Inspector	Records maintained separately?
					☐
					☐
					☐
					☐
					☐

Indicate in the table above if records of facility inspections are maintained separately at this facility.

Facility Name: _____ Page 16 Tier I Qualified Facility SPCC Plan

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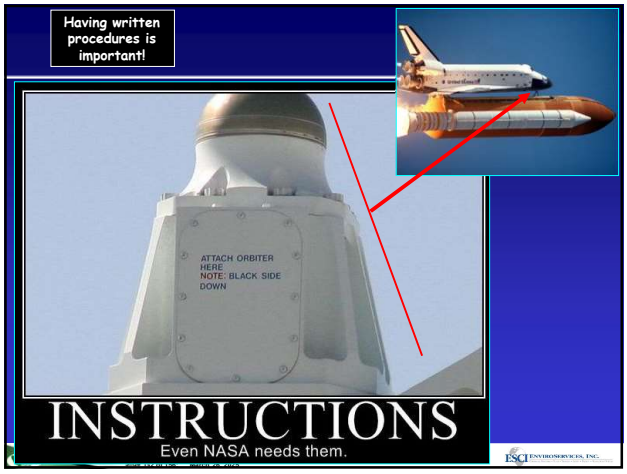

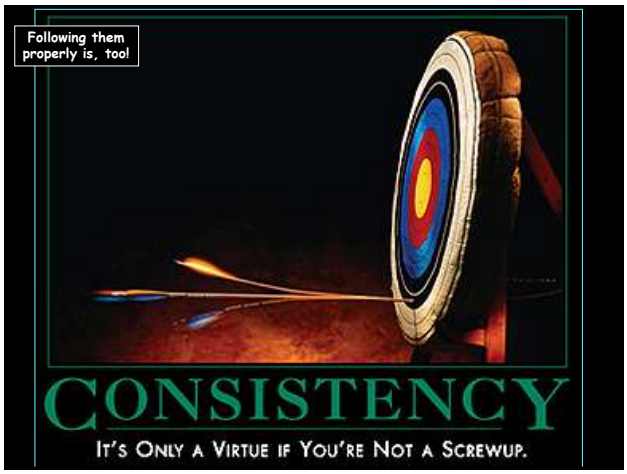

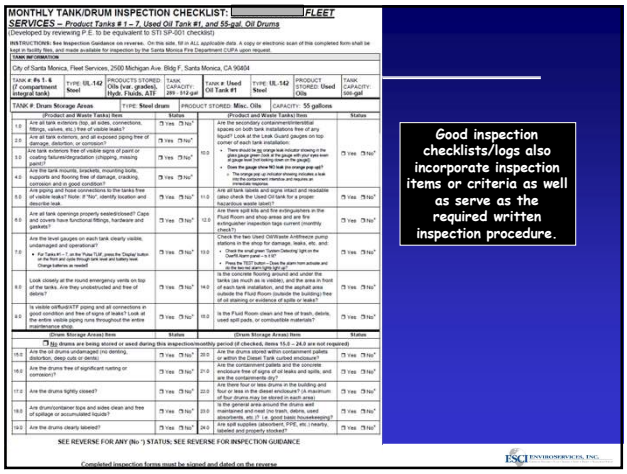

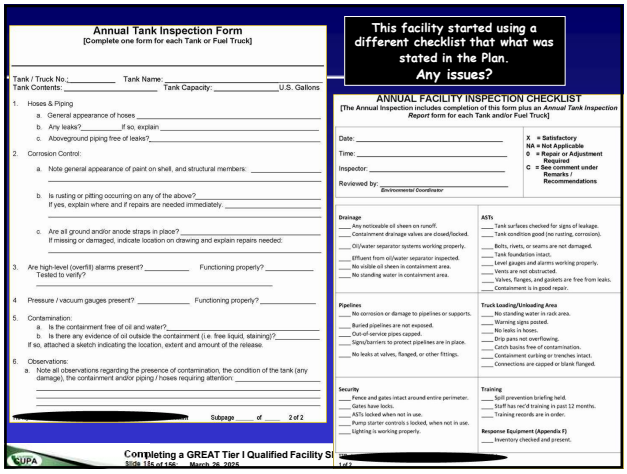

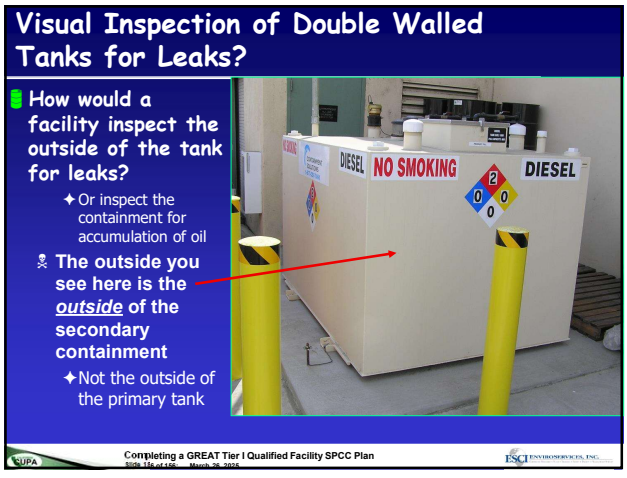

Visual Inspection of Integral Double Walled Tanks for Leaks?

- Most have provisions for the use of interstitial space leak detection or monitoring
  - Some tanks *are* already equipped with leak detectors
    - Manufacturer or supplier optional equipment
    - ✦Mechanical or electronic systems
    - Locally or remotely reported
  - Most tanks are not so equipped
    - ✦Facilities may assume that visually inspecting the outside of the tank (the outside surface) is sufficient… but it's not
      - A likely potential compliance issue (2002 US EPA memo raised the issue)

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Verification?

- In SPCC Plan
  - Plan should describe if interstitial space is monitored
- Is it??
  - Look at tank top for 'monitor port' or other sensor/ detector port
    - ✦Is it just capped… or is there a sensor or monitor?

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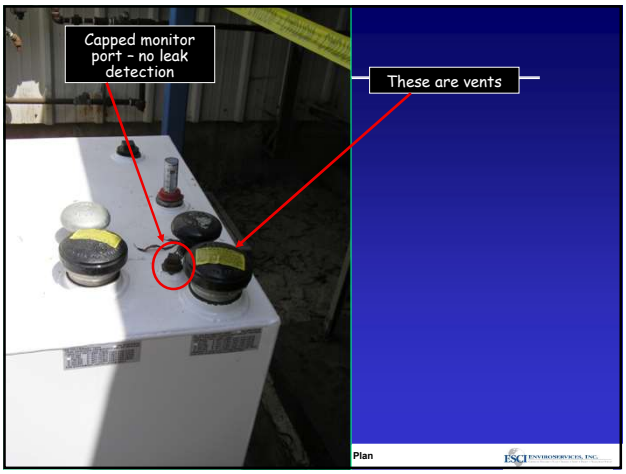

Plan

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Page 5 Personnel, Training & Procedures Detail

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]**	☐

- Training must be provided to oil-handling personnel at least once
  - With specific required subject coverage
- Spill prevention briefings must be conducted annually
  - Specific topics
- This person is probably… YOU!

Required Training & Annual Briefings

- Two types of training is required by 40 CFR 112.7(f)
  1. Relatively detailed training of oil handling personnel in the SPCC Plan and its implementation
     - No specified frequency
     - Specific subject/topical content requirements
  2. Spill prevention briefings
     - Annual frequency
     - A few subject content requirements

Required Training

- Facility must train oil-handling personnel (40 CFR 112.7(f)(1))
  - Training for oil-handling employees (and those with oil spill prevention responsibilities)
  - At a minimum, this training must include:
    1. Applicable pollution control laws and regulations
    2. Operation & maintenance of oil discharge prevention systems/equipment
    3. Discharge procedures protocols
    4. General facility operations
    5. Contents of the SPCC Plan

Required Annual Briefings

- Facility must schedule and conduct annual discharge prevention briefings for oil-handling personnel (40 CFR 112.7(f)(3))
  - ...to assure adequate understanding of the SPCC Plan for the facility
  - Briefings must highlight and describe:
    - ✦Known (harmful) discharges to navigable waters
    - ✦Failures, malfunctioning components, and
    - ✦Any recently developed precautionary measures
- As long as training or briefings meet the topical coverage
  - Briefings can be integrated with other trainings

Page 19 (Attachment 3.4, Table G-19) Oil-Handling Personnel Training & Briefing Log

- Make sure:
  - Description / Scope contains the required content (see the Page 5 detail)
    - ✦Write it in the space each time
- Or use your own training sign in sheet
  - Make sure it details the training session description or scope
    - ✦And it meets the subject requirements (for training or annual briefings), and retain these records for at least 3 years

ATTACHMENT 3.4 – Oil-handling Personnel Training and Briefing Log

Table G-19 Oil-Handling Personnel Training and Briefing Log

Date	Description / Scope	Attendees

Environmental Training Attendance Record

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

☐ Instructor/Facilitator: Page: ____ of ____

Environmental Training Attendance Record

Training Course: *Spill Prevention, Control &Countermeasure Plan & Haz Mat Emergency Response* *(Annual Briefing)*

☐ Instructor/Facilitator: Page: ____ of ____

Training Date/Time: / Location:

☐ SPCC Training Outline-Non-Facilitated Page: ____ of ____

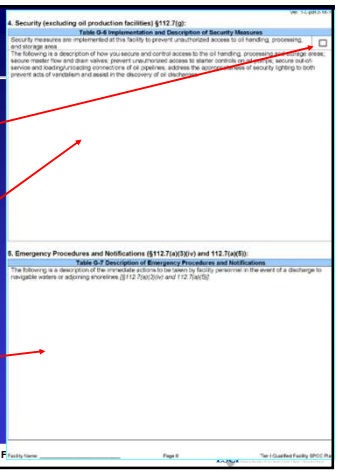
Topics Covered:

- 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)
- Review of emergency response basic requirements
  - CERS Consolidated Contingency Plan
  - Oil Spill Emergency Procedures
- Spill reporting requirements

Printed Name (first, last)	Signature	Department / Function	Date of Hire

Page 6

- G-6: Security Measures
  - Affirmation of implementation of security measures
  - Narrative description of the security measures used
- G-7: Emergency Procedures & Notification
  - Narrative description of the emergency response actions to be taken


4. Security (excluding oil production facilities) §112.7(g):
Table G-6 Implementation and Description of Security Measures
Security measures are implemented at this facility to prevent unauthorized access to oil handling, processing, and storage area.
The following is a description of how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.
5. Emergency Procedures and Notifications (§112.7(a)(3)(iv) and 112.7(a)(5)):
Table G-7 Description of Emergency Procedures and Notifications
The following is a description of the immediate actions to be taken by facility personnel in the event of a discharge to navigable waters or adjoining shorelines (§112.7(a)(3)(iv) and 112.7(a)(5))

Completing a GREAT Tier I Qualified F
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Page 6 Security Measures Detail

4. Security (excluding oil production facilities) §112.7(g):

Table G-6 Implementation and Description of Security Measures	
Security measures are implemented at this facility to prevent unauthorized access to oil handling, processing, and storage area.	☐
The following is a description of how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges:	

Sample in a minute…

- Narratively describe how your facility meets these security requirements… e.g.:
  - All entry gates and doors are secured from unauthorized access either with locks or attended posts (guard, receptionist, etc.)
  - Valves and tank controls are secured with locks
  - Facility is equipped with security and area lighting on timers, photosensors or motion sensors

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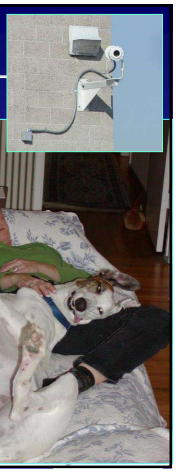
Security

- Must address the security of listed specific and general areas of the facility (40 CFR 112.7(g))
  - Specific methods are up to the facility
    - ✦Performance-oriented
  - The methods or measures used must be described in the SPCC Plan



Completing a GREAT Tier I Qualified Facility SPCC Pl
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Security (continued)

- Required security elements
  - Secure & control access to all oil handling, storage & processing areas / equipment
  - Secure master flow and drain valves
  - Prevent unauthorized access to starter controls
  - Secure out of service & loading/unloading connections
  - Address appropriateness of security lighting to discourage vandalism and facilitate discharge discovery & response

Example Security Measures

The entire facility does not have to be fenced/secured… it may just be the tanks.

But how good is the fence?

4. Security (excluding oil production facilities) §112.7(g):

Table G-6 Implementation and Description of Security Measures

Security measures are implemented at this facility to prevent unauthorized access to oil handling, processing, and storage area.	☑

The following is a description of how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.

A) Accesss to the facility is controlled by:
- > Locked gates or doors during off-hours
- > Fencing and concrete block walls
- > Required sign-in and authorization for non-employees (managed by office employees)
- > Employees trained to challenge non-employees observed in oil-handling and other facility areas

B) Fueling and oil dispensing nozzles are locked or otherwise secured from unauthorized use or access.

C) Tank loading connections are capped, locked or otherwise secured from unauthorized access.

D) There is a big, nasty, hungry dog with sharp teeth and foul breath hiding somewhere on the property.

E) Facility is equipped with security lighting (on timers, photocells or motion sensors). Lighting is adequate to discourage vandalism and to aid discovery of oil discharges.

Sample for Class

Page 6 Emergency Procedures and Notification Detail

5. Emergency Procedures and Notifications (§112.7(a)(3)(iv) and 112.7(a)(5)):

Table G-7 Description of Emergency Procedures and Notifications

The following is a description of the immediate actions to be taken by facility personnel in the event of a discharge to navigable waters or adjoining shorelines *[§112.7(a)(3)(iv) and 112.7(a)(5)]*.

Sample in a minute...

- Summarize your 'Emergency Response Plans & Procedures' from your *Consolidated Contingency Plan* forms submitted in CERS
  - Reference the Plan in your narrative as well
  - Make sure your action plans are consistent with any active general containment measures you described in the SPCC Plan

5. Emergency Procedures and Notifications (§112.7(a)(3)(iv) and 112.7(a)(5)):

Table G-7 Description of Emergency Procedures and Notifications

The following is a description of the immediate actions to be taken by facility personnel in the event of a discharge to navigable waters or adjoining shorelines *[§112.7(a)(3)(iv) and 112.7(a)(5)]*.

As detailed in the facility's Hazardous Materials Business Plan - Emergency/Contingency Plan...

Upon discovery of a spill or leak, facility personnel will:

1. Immediately contact/notify facility management or supervision.

2. If the source or cause of the spill/discharge can be safety shut off, personnel will immediately attempt to do so.

3. Management/supervision will determine if the spill/discharge poses a threat to health, safety, property or the environment (including any spill entering a storm drain, off site waterway or leaving the property) - and will immediately notify the CUPA, Calif. EMA and the National Response Center. 9-1-1 will be called is necessary

4. If the spill/discharge can be safely cleaned up by facility personnel using available spill supplies - they will do so (in accordance with the facility's Business Emergency Plan).

5. In all cases - if the spill/discharge may threaten a storm drain on site or threaten to leave the property, employees will attempt to place sorbents in the spill path or around drains to block the spill - if it can be done safety.

6. The facility's hazardous waste contractor will be called to assist in clean up if necessary.

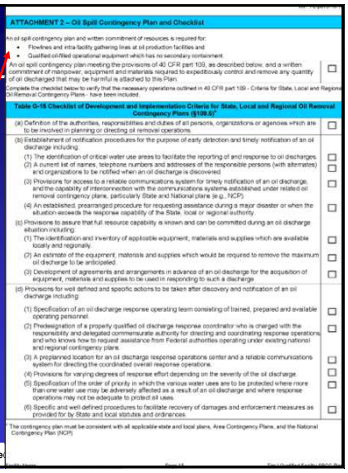
7. All collected spill residues will be properly disposed of as a hazardous waste.

Sample for Class

Facility Name: Sample Class facility Page 6 Tier I Qualified Facility SPCC Plan

Page 15 (Attachment 2) Oil Spill Contingency Plan

- An OSCP is a specific type of emergency plan
  - OSCP standards in 40 CFR 109.5
  - Limited applicability
  - Most APSA-regulated tank facilities will not need a 40 CFR 109 OSCP
  - You can leave Page 15 blank or write N/A on it


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.

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) 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., 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 which 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) Predesignation 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.

(6) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.

The contingency plan must be consistent with all applicable state and local plans, Area Contingency Plans, and the National Contingency Plan (NCP).

Page 7

- G-8: Contact List (for emergencies)
  - Copy from your CERS CCP
    - 'Emergency Contacts' form
    - Other numbers from the 'Agency Notification' form
  - Keep all forms and Plans current and consistent!

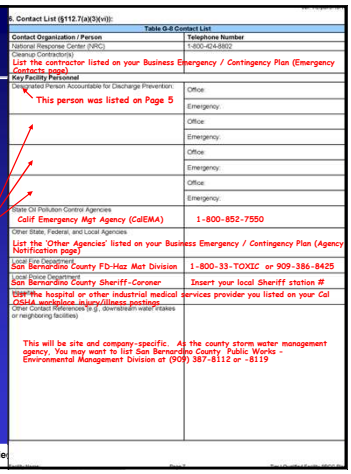

6. Contact List (§112.7(a)(3)(vi)):

Table G-8 Contact List

Contact Organization / Person	Telephone Number
National Response Center (NRC)	1-800-424-8802
Cleanup Contractor(s)	List the contractor listed on your Business Emergency / Contingency Plan (Emergency Contacts page)
Key Facility Personnel	
Designated Person Accountable for Discharge Prevention:	This person was listed on Page 5
	Office:
	Emergency:
	Office:
	Emergency:
	Office:
	Emergency:
	Office:
	Emergency:
State Oil Pollution Control Agencies	
Calif Emergency Mgt Agency (CalEMA)	1-800-852-7550
Other State, Federal, and Local Agencies	
List the 'Other Agencies' listed on your Business Emergency / Contingency Plan (Agency Notification page)	
Local Fire Department	
San Bernardino County FD-Haz Mat Division	1-800-33-TOXIC or 909-386-8425
Local Police Department	
San Bernardino County Sheriff-Coroner	Insert your local Sheriff station #
List the hospital or other industrial medical services provider you listed on your Cal OSHA workplace injury/illness postings	
Other Contact References (e.g., downstream water intakes or neighboring facilities)	This will be site and company-specific. As the county storm water management agency, You may want to list San Bernardino County Public Works - Environmental Management Division at (909) 387-8112 or -8119

Page 8

- G-9: Notification Procedures
  - Instructions and a compliance affirmation
    - Instructions consistent with your CUPA's Emergency / Contingency Plan 'Agency Notification' page
- SPCC-Specific Spill Reporting
- I add Calif. reporting to my QF Plans
  - I have full Acrobat…

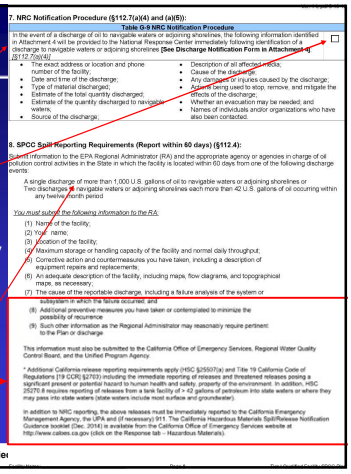

7. NRC Notification Procedure (§112.7(a)(4) and (a)(5)):

Table G-9 NRC Notification Procedure

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information identified in Attachment 4 will be provided to the National Response Center immediately following identification of a discharge to navigable waters or adjoining shorelines **[See Discharge Notification Form in Attachment 4]**. *[§112.7(a)(4)]*

- The exact address or location and phone number of the facility;
- Date and time of the discharge;
- Type of material discharged;
- Estimate of the total quantity discharged;
- Estimate of the quantity discharged to navigable waters;
- Source of the discharge;
- Description of all affected media;
- Cause of the discharge;
- Any damages or injuries caused by the discharge;
- Actions being used to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation may be needed; and
- Names of individuals and/or organizations who have also been contacted.

8. SPCC Spill Reporting Requirements (Report within 60 days) (§112.4):

Submit information to the EPA Regional Administrator (RA) and the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located within 60 days from one of the following discharge events:

A single discharge of more than 1,000 U.S. gallons of oil to navigable waters or adjoining shorelines or
Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons of oil occurring within any twelve month period

You must submit the following information to the RA:

(1) Name of the facility;
(2) Your name;
(3) Location of the facility;
(4) Maximum storage or handling capacity of the facility and normal daily throughput;
(5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
(6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
(7) The cause of the reportable discharge, including a failure analysis of the system or subsystem in which the failure occurred; and
(8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence
(9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

This information must also be submitted to the California Office of Emergency Services, Regional Water Quality Control Board, and the Unified Program Agency.

* Additional California release reporting requirements apply (HSC §25507(a) and Title 19 California Code of Regulations [19 CCR] §2703) including the immediate reporting of releases and threatened releases posing a significant present or potential hazard to human health and safety, property of the environment. In addition, HSC 25270.8 requires reporting of releases from a tank facility of > 42 gallons of petroleum into state waters or where they may pass into state waters (state waters include most surface and groundwater).

In addition to NRC reporting, the above releases must be immediately reported to the California Emergency Management Agency, the UPA and (if necessary) 911. The California Hazardous Materials Spill/Release Notification Guidance booklet (Dec. 2014) is available from the California Office of Emergency Services website at http://www.caloes.ca.gov (click on the Response tab – Hazardous Materials).

Page 8 Emergency Notification Detail

7. NRC Notification Procedure (§112.7(a)(4) and (a)(5)):

Table G-9 NRC Notification Procedure

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information identified in Attachment 4 will be provided to the National Response Center immediately following identification of a discharge to navigable waters or adjoining shorelines **[See Discharge Notification Form in Attachment 4]**. *[§112.7(a)(4)]*

- The exact address or location and phone number of the facility;
- Date and time of the discharge;
- Type of material discharged;
- Estimate of the total quantity discharged;
- Estimate of the quantity discharged to navigable waters;
- Source of the discharge;
- Description of all affected media;
- Cause of the discharge;
- Any damages or injuries caused by the discharge;
- Actions being used to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation may be needed; and
- Names of individuals and/or organizations who have also been contacted.

- Consistent with CUPA's Agency Notification instructions in Emergency/Contingency Plan
  - In fact… just follow the County's instructions
- Will meet APSA reporting requirements of HSC 25270.8

Page 9 SPCC Spill Reporting Detail

8. SPCC Spill Reporting Requirements (Report within 60 days) (§112.4):

Submit information to the EPA Regional Administrator (RA) and the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located within 60 days from one of the following discharge events:

A single discharge of more than 1,000 U.S. gallons of oil to navigable waters or adjoining shorelines or
Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons of oil occurring within any twelve month period

You must submit the following information to the RA:

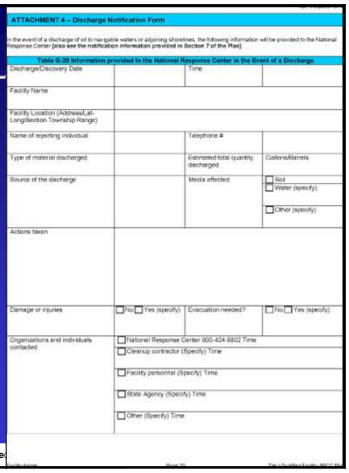
(1) Name of the facility;
(2) Your name;
(3) Location of the facility;
(4) Maximum storage or handling capacity of the facility and normal daily throughput;
(5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
(6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
(7) The cause of the reportable discharge, including a failure analysis of the system or subsystem in which the failure occurred; and
(8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence
(9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

* * * * *

- These are additional requirements for formal reporting to US EPA Region IX and the RWQCB in the event of a major oil discharge to navigable waters

Page 20 (Attachment 4, Table G-20) Discharge Notification Form

- You can alternatively make your own discharge notification form
  - This form is not required to be submitted to US EPA for a discharge
  - Some CUPAs requires a written report within xx days
    - Can use this form if it has state and local reporting details



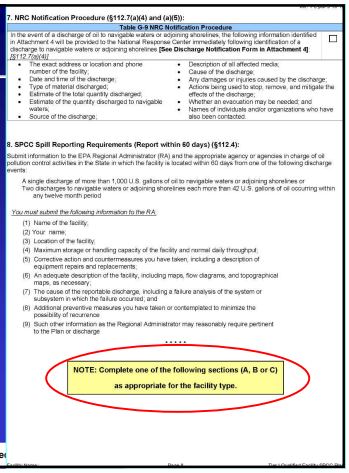
ATTACHMENT 4 – Discharge Notification Form

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information will be provided to the National Response Center (**also see the notification information provided in Section 7 of the Plan**)

Table G-20 Information provided to the National Response Center in the Event of a Discharge

Discharge/Discovery Date		Time	
Facility Name			
Facility Location (Address/Lat-Long/Section Township/Range)			
Name of reporting individual		Telephone #	
Type of material discharged		Estimated total quantity discharged	Gallons/Barrels
Source of the discharge		Media affected	☐ Soil ☐ Water (specify) ☐ Other (specify)
Actions taken			
Damage or injuries	☐ No ☐ Yes (specify)	Evacuation needed?	☐ No ☐ Yes (specify)
Organizations and individuals contacted	☐ National Response Center 800-424-8802 Time ☐ Cleanup contractor (Specify) Time ☐ Facility personnel (Specify) Time ☐ State Agency (Specify) Time ☐ Other (Specify) Time		

- Now go to Section A
  - Sections B & C (page 12 – 13) likely do not apply
  - B & C facilities are oil production-related and therefore exempted by APSA
  - Still US EPA regulated



7. NRC Notification Procedure (§112.7(a)(4) and (a)(5)):

Table G-9 NRC Notification Procedure

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information identified in Attachment 4 will be provided to the National Response Center immediately following identification of a discharge to navigable waters or adjoining shorelines **[See Discharge Notification Form in Attachment 4]**

§§112.7(a)(4)

- The exact address or location and phone number of the facility;
- Date and time of the discharge;
- Type of material discharged;
- Estimate of the total quantity discharged;
- Estimate of the quantity discharged to navigable waters;
- Source of the discharge;
- Description of all affected media;
- Cause of the discharge;
- Any damages or injuries caused by the discharge;
- Actions being used to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation may be needed; and
- Names of individuals and/or organizations who have also been contacted.

8. SPCC Spill Reporting Requirements (Report within 60 days) (§112.4):

Submit information to the EPA Regional Administrator (RA) and the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located within 60 days from one of the following discharge events:

A single discharge of more than 1,000 U.S. gallons of oil to navigable waters or adjoining shorelines or
Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons of oil occurring within any twelve month period

You must submit the following information to the RA:

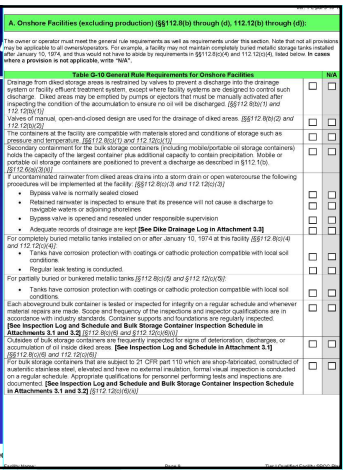
(1) Name of the facility;
(2) Your name;
(3) Location of the facility;
(4) Maximum storage or handling capacity of the facility and normal daily throughput;
(5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
(6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
(7) The cause of the reportable discharge, including a failure analysis of the system or subsystem in which the failure occurred; and
(8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence
(9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

* * * * *

NOTE: Complete one of the following sections (A, B or C) as appropriate for the facility type.

Page 9 Section A

- Table G-10: General Rule requirements for Onshore Facilities
  - Continues on Page 10
  - Essentially – additional requirements for:
    - Bulk containers/tanks & associated components
      - Sized containment
      - Specific inspection elements
      - Overfill prevention
      - Discharge correction
    - Drainage of containment areas
    - Discharge controls
  - Mostly compliance affirmation checkboxes
    - With N/A boxes



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-10 General Rule Requirements for Onshore Facilities		N/A
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)]*	☐	☐
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)]*	☐	☐
Secondary containment for the bulk storage containers (including mobile/portable oil storage containers) holds the capacity of the largest container plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). *[§112.8(c)(2)(i)]*	☐	☐
If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following procedures will be implemented at the facility. *[§§112.8(c)(3) and 112.12(c)(3)]*		
• Bypass valve is normally sealed closed	☐	☐
• 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 under responsible supervision	☐	☐
• Adequate records of drainage are kept **[See Dike Drainage Log in Attachment 3.3]**	☐	☐
For completely buried metallic tanks installed on or after January 10, 1974 at this facility *[§§112.8(c)(4) and 112.12(c)(4)]*		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☐
• Regular leak testing is conducted.	☐	☐
For partially buried or bunkered metallic tanks *[§112.8(c)(5) and §112.12(c)(5)]*		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☐
Each aboveground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Scope and frequency of the inspections and inspector qualifications are in accordance with industry standards. Container supports and foundations are regularly inspected. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§§112.8(c)(6) and §§112.12(c)(6)(i)]*	☐	☐
Outside of bulk storage containers are frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(c)(6) and 112.12(c)(6)]*	☐	☐
For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are documented. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.12(c)(6)(ii)]*	☐	☐

Page 9 G-10 Detail: Diked Area Drainage

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-10 General Rule Requirements for Onshore Facilities		N/A
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)]*	☐	☐

- If a diked or curbed containment area is equipped with discharge valves, pipes or fittings:
  - Including double walled tanks, containment pallets for drums, etc.
  - Valves, pipes and fittings must be manually operated, and of open-and-closed design (not flapper valves)
  - If containment is pumped out, it must be manually pumped and only <u>after</u> documented inspection of accumulation for oil

Drainage Controls (from containment areas)

- Objective: Prevent oil-contaminated water from escaping the facility and becoming a harmful navigable water discharge
  - Storm water permitting and storm water pollution prevention plan restrictions are essentially the same

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Draining Containment to a Treatment System

- Containment areas may be drained or pumped out into facility drainage or effluent treatment systems only if the treatment system is designed to control oil discharges to waterways
  - e.g. oil/water separation and oil/water clarifier treatment systems
    - They must be specifically designed to handle and remove oil

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Is Draining Containment *Required*?

- Yes: If there is oil in the containment
  - 40 CFR 112.8(c)(10) requires prompt removal of accumulations of oil in secondary containment
- No: If there is just water (e.g. storm water) in the containment
  - Must assure there is still sufficient freeboard for precipitation
  - And that the storm water is free of sheen

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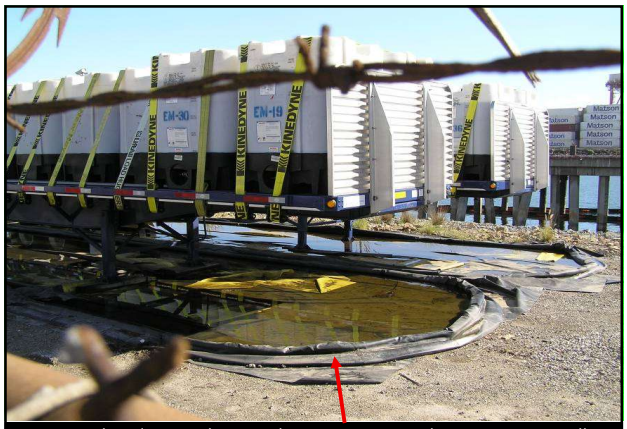
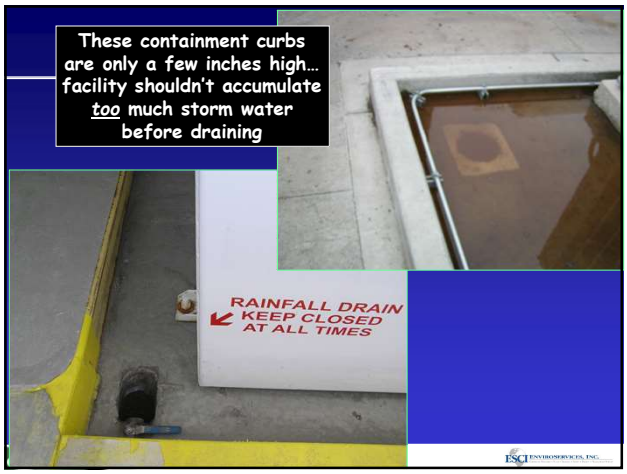
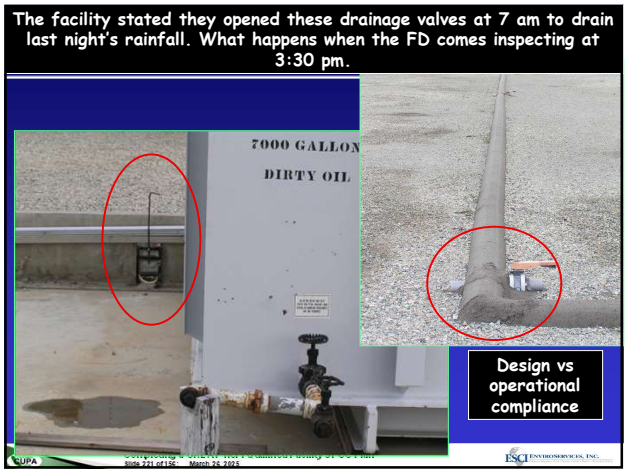
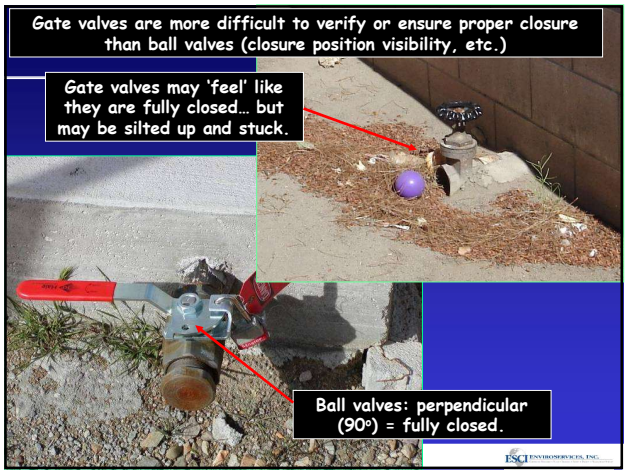


As more liquid accumulates in this containment – the containment walls expand/rise to a max. 12"







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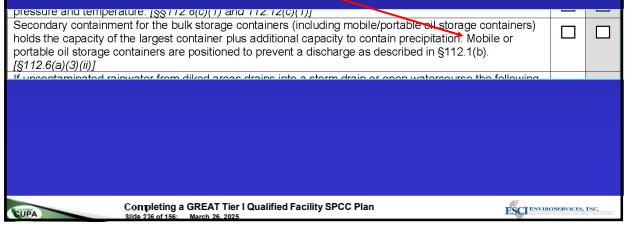
Page 9 G-10 Detail: Tank / Container Compatibility

- Shouldn't be a problem to just check the box
  - Be aware… do you have any corrosive/acidic additives in your oil? Anything under pressure?

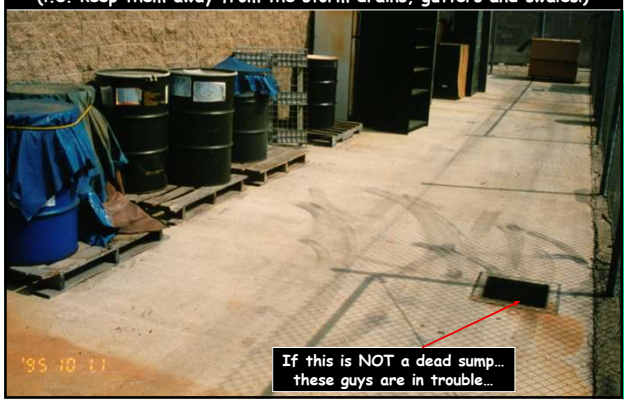
The containers at the facility are compatible with materials stored and conditions of storage such as pressure and temperature. *[§§112.8(c)(1) and 112.12(c)(1)]*	☐	☐

Page 9 G-10 Detail: Secondary Containment for Bulk Containers

- Already discussed secondary containment…
  - But be aware of the 'discharge prevention positioning' requirement for portable containers and tanks



In addition to containment requirements… portable containers must be positioned to prevent a discharge to navigable waters
(i.e. keep them away from the storm drains, gutters and swales!)



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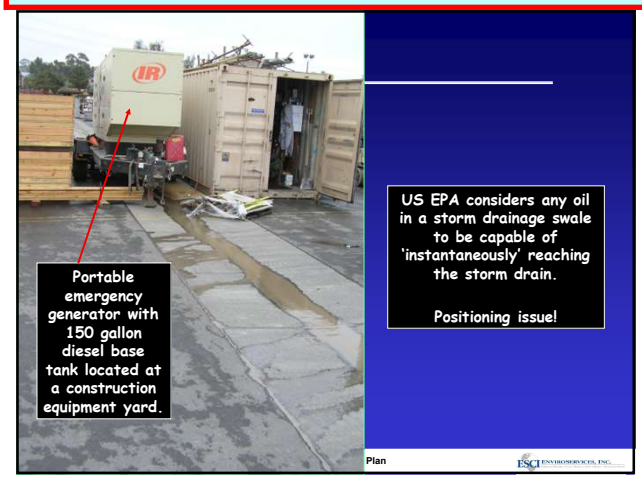
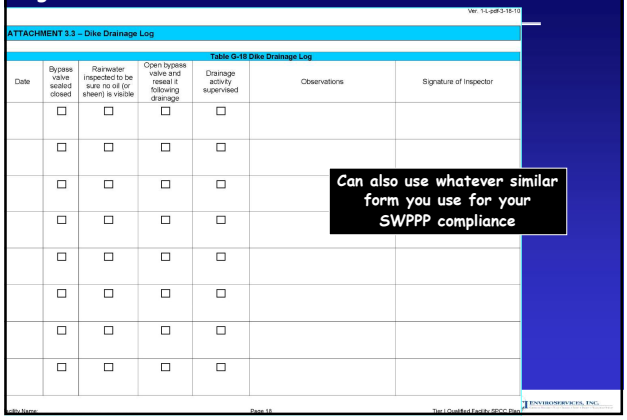


Page 9 G-10 Detail: Drainage of Uncontaminated Rainwater from Diked Areas

If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following procedures will be implemented at the facility: *[§§112.8(c)(3) and 112.12(c)(3)]*		
• Bypass valve is normally sealed closed	☐	☐
• 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 under responsible supervision	☐	☐
• Adequate records of drainage are kept **[See Dike Drainage Log in Attachment 3.3]**	☐	☐
For completely buried metallic tanks installed on or after January 10, 1974 at this facility *[§§112.8(c)(4)*		

- **These requirements apply IF you drain contained stormwater directly to the storm water drain, creek or stream**
  - **If you always let it evaporate or percolate into containment (dirt/gravel) floor – these will not apply**
- **These are consistent with SWPPP requirements**
  - ✦Do you have a SWPPP?
- **Must ensure you follow all four requirements**
  - ✦Make sure personnel are properly trained

Page 18 (Attachment 3.3, Table G-18) Dike Drainage Log



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ATTACHMENT 3.3 – Dike Drainage Log

Table G-18 Dike Drainage Log

Date	Bypass valve sealed closed	Rainwater inspected to be sure no oil (or sheen) is visible	Open bypass valve and reseal it following drainage	Drainage activity supervised	Observations	Signature of Inspector
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		

Can also use whatever similar form you use for your SWPPP compliance

Facility Name: Page 18 Tier I Qualified Facility SPCC Plan

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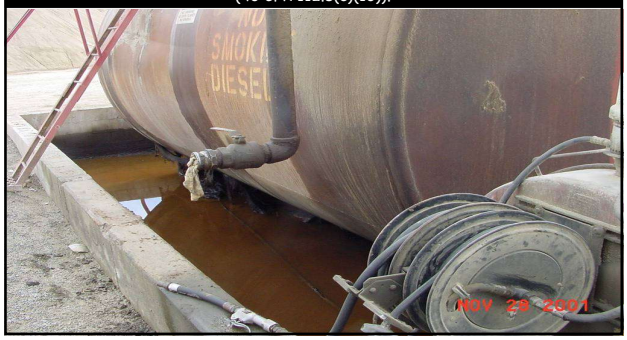
For some containment dikes/areas… there is so much oil residue, the facility would never be able to simply discharge the contained water in compliance. They could contain it as a waste, however. Letting it just accumulate may adversely impact the available containment volume. This facility is likely not complying with requirement to frequently inspect for accumulation of oil inside diked areas (40 CFR 112.8(c)(6) or prompt removal of oil accumulation in diked areas (40 CFR 112.8(c)(10)).



Page 9 G-10 Detail: Corrosion Protection for Buried Metallic Tanks

- California UST requirements are WAY more strict than these…

For completely buried metallic tanks installed on or after January 10, 1974 at this facility *[§§112.8(c)(4) and 112.12(c)(4)]*:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☐
• Regular leak testing is conducted.	☐	☐
For partially buried or bunkered metallic tanks *[§112.8(c)(5) and §112.12(c)(5)]*:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☐

- Don't forget the "N/A" check boxes if these do not apply to you

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Page 9 G-10 Detail: Inspections and Integrity Testing for Bulk Tanks and Containers

- We already covered these requirements

Each aboveground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Scope and frequency of the inspections and inspector qualifications are in accordance with industry standards. Container supports and foundations are regularly inspected. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.9(c)(6) and §112.12(c)(6)(i)]*	☐	☐
Outsides of bulk storage containers are frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(c)(6) and 112.12(c)(6)]*	☐	☐
For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are documented. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.12(c)(6)(ii)]*	☐	☐

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Page 10 Section A

- Table G-10: General Rule requirements for Onshore Facilities
  - Continued from Page 9
  - Covers
    - Overfill prevention
    - Additional inspections
    - Discharge/ leak correction

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:	☐	☐
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)]*	☐	☐
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. *[§§112.8(c)(10) and 112.12(c)(10)]*	☐	☐
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. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☐	☐
Integrity and leak testing are conducted on buried piping at the time of installation, modification, construction, relocation, or replacement. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☐	☐

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Page 10 G-10 Detail: Overfill Prevention

- Applies to bulk containers and tanks
  - Must have either
    - Overfill prevention system(s)
    - Documented overfill prevention procedure
  - Must describe the system(s) and/or procedure(s) you use
  - Must regularly test them for proper operation

Sample for Class Ver. 1-L-pdf-3-18-10

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: > Bulk fuel storage tanks (T-1 and T-2) are equipped with level gauges (clock gauge and/or pop-up float level gauge). > Lube oil tanks (T-3 and T-4) and all hydraulic systems are equipped with sight gauges/tubes. > Hazardous waste drums are equipped with pop up float level indicators or large opening fill funnels (providing visual level verification by looking into funnel opening). Written procedures posted at all bulk tank and drum locations specify that tank/drum liquid levels be checked prior to filling/loading activity, and that levels are constantly visually monitored by employees and/or fuel/oil vendors during filling/loading activities. Gauges and indicators are tested by observation during filling activities for proper operation and checked for damage during monthly inspections.	☐	☑
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)]*	☐	☑

Overfill Prevention

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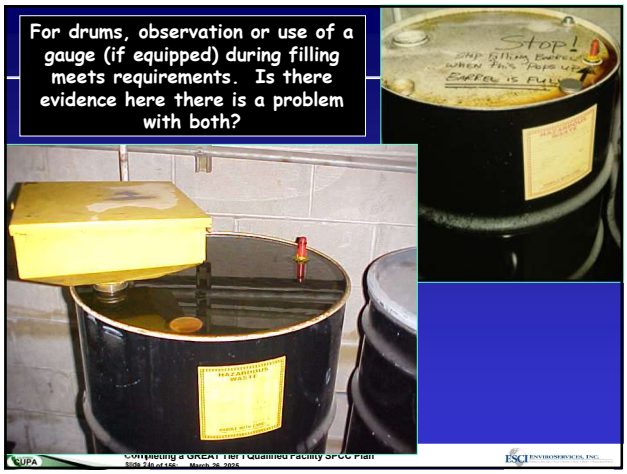
For drums, observation or use of a gauge (if equipped) during filling meets requirements. Is there evidence here there is a problem with both?



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Overfill Prevention

That the facility/vendor is following a tank filling procedure which includes visual verification and monitoring of the tank level by sticking the tank level, or looking into the tank fill port, etc. and verifying amount to be (manually) pumped

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Overfill Prevention

- Again: not just the engineering
  - Need procedures so personnel know what the numbers and alarms *mean*

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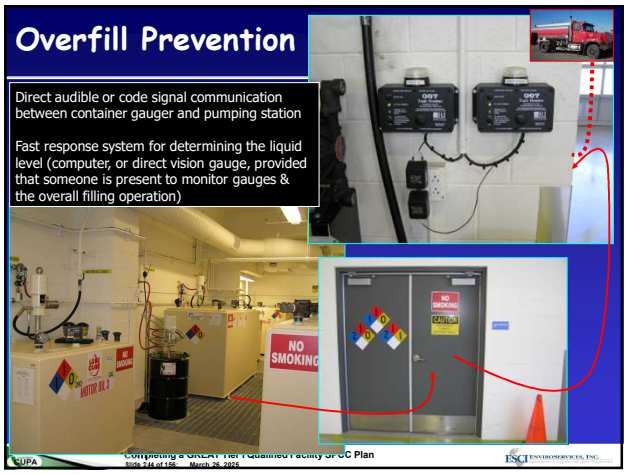

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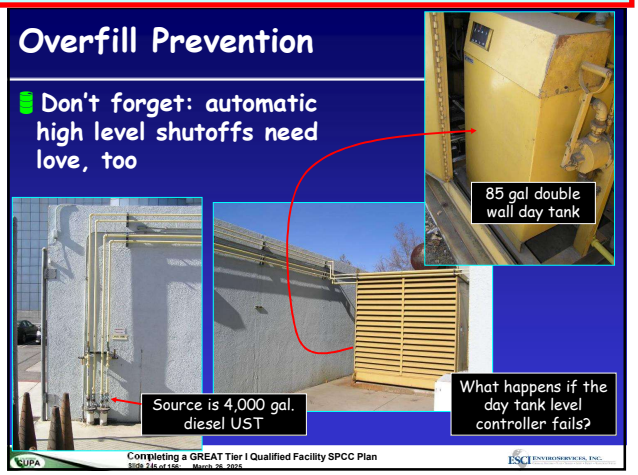

Page 10 G-10 Detail: Correction of Visible Discharges

- Simple requirement… easy to check the affirmation box
  - Usually identified as a routine part of inspections
  - But very subjective… and troublesome!

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. *[§§112.8(c)(10) and 112.12(c)(10)]*	☐	☐

- Loss of oil or accumulations of oil vs. normally operating tank with long service history

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Visible Discharge Correction

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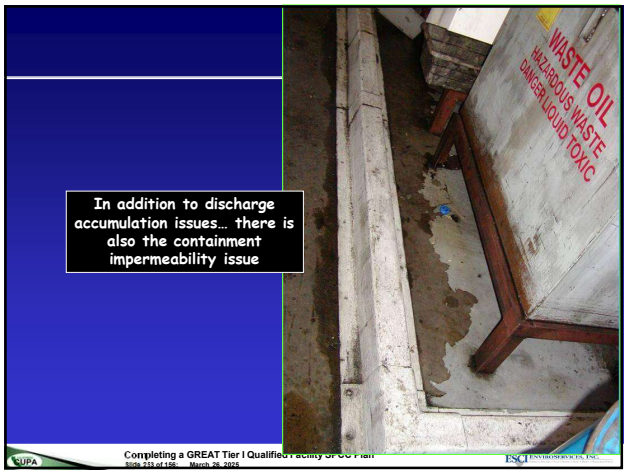
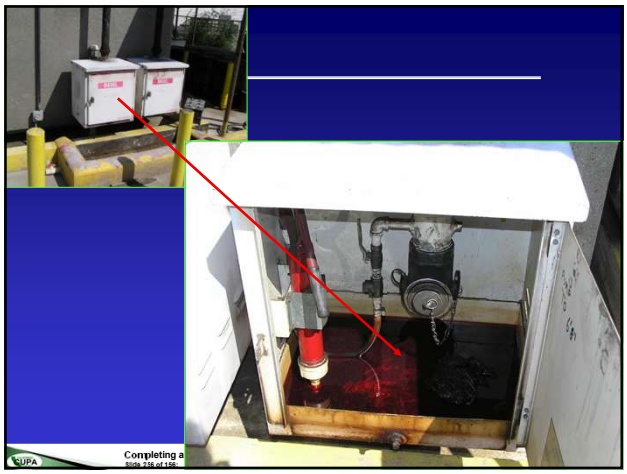
The inspector should look into the secondary containment on this tank… there may have been a 'loss of oil from the container' and an accumulation of oil in the containment.

An obvious compliance issue (if oil accumulation is not promptly removed and discharge corrected)





Page 10 G-10 Detail: Inspections and Testing of Piping

- We already covered the routine inspection of piping associated with bulk tanks & containers

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. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☐	☐
Integrity and leak testing are conducted on buried piping at the time of installation, modification, construction, relocation, or replacement. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☐	☐

- If there is buried oil piping at your facility, must assure these testing requirements are met
  - Maintenance and construction personnel must be made aware
  - Similar to UST piping testing requirements
    - ✦But… this piping may not be considered part of an UST system

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Final Thoughts

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Managing and Reviewing From Inspector's Perspective: Physical Facility

- **Make sure facility diagram and table match physical facility**
  - ✦Tanks, container areas, loading/unloading areas, etc.
- **Visual compliance systems are a big help**
  - ✦Procedures posted at the point of use
    - **Loading/unloading areas, drainage valves, drum storage areas, hydraulic equipment**
    - **Include posted emergency procedures at each area**
  - ✦Signs to keep valves closed, etc.
  - ✦Well marked spill kits and drain covers
  - ✦Inspection forms describing procedure & conditions/items to inspect
    - **Assure forms referenced in Plan match the forms used**
    - **Assure forms contain all required conditions/items**

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Managing and Reviewing From Inspector's Perspective: Physical Facility

- **Housekeeping and cleanliness are key**
  - ✦Does it look like you're doing what you say you're doing?
    - **Containments clean and dry**
    - **Tank, drum and OF equipment exteriors clean**
    - **Ability to inspect all sides of tanks**

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)**
A – Horizontal, single wall, cylindrical UL-142 steel tank #1 on concrete saddles and pad	Waste oil	1,500
A – Steel drums #1 to # 6, each 65 gallons in shell capacity	Lube oil	390
A – Steel drums #7, #8, and #9, each 65 gallons in shell capacity	Automatic transmission fluid	195
A – Steel drum #10	Gear oil	65
A – Steel drums #11 and #12, each 65 gallons in shell capacity	Hydraulic oil	130
A – Rectangular, double-walled tank #2 consisting of a polyethylene inner tank enclosed with a steel outer jacket	Heating oil	275
A – Horizontal, double-walled, cylindrical UL-142 and F921 fire resistant steel tank #3 with on-tank dispenser and on steel saddles	Kerosene	500

Total Aboveground Storage Capacity [c]	3,055	gallons
Total Completely Buried Storage Capacity	0	gallons
Facility Total Oil Storage Capacity	3,055	gallons

This is an example from USEPA's Tier I class at the 2022 CUPA Conference

Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided.

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)
Bulk Storage Containers and Mobile/Portable Containers[b]					
1,500 gal waste oil tank #1	Tank overfill, fitting leak, seam failure	<1 – 1,500	South to undeveloped lot	Concrete pad and dike	2,356
65 gal lube oil drums #1 to #6 (inside shop)	Fitting leak, seam failure	<1 – 65	To shop floor	Steel leak tray	80
65 gal other oil product drums #7 to #12 (inside shop)	Fitting leak, seam failure	<1 – 65	To shop floor	Steel leak tray	80
Heating oil tank #2	Tank overfill, fitting leak, seam failure	<1 – 275	South to undeveloped lot	Double wall	280
Kerosene tank #3	Tank overfill, fitting leak, seam failure	<1 – 500	South to undeveloped lot	Double wall	515
Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)[c]					
None with container ≥ 55 gallons					
Piping, Valves, etc.					
Oil dispensing hoses and appurtenances (inside shop)	Fitting leak or failure, hose failure	< 1	To shop floor	Spill kit and drip pans	Absorbs up to 30/pans contain up to 2
Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)					
Automotive oil servicing in shop and filling oil dispensing system drums	Handling drips and spills, drum overfill, transfer hose failure	<1 pt – 0.5	To shop floor	Catch pans and spill kit	Absorbs up to 30/pans contain up to 2
Gasoline, heating oil, and kerosene unload areas	Receiving tank overfill, fitting leak or failure, fuel transfer hose failure	1 – 20	Radial to concrete pavement	Spill kit	Absorbs up to 30
Gasoline dispensing island	Vehicle gas tank overfill, fitting leak or failure, fuel transfer hose failure	1 – 2	Radial to concrete pavement	Spill kit	Absorbs up to 45
Kerosene dispensing	Portable container overfill, fitting leak or failure, fuel transfer hose failure	< 0.5	Radial to concrete pavement	Spill kit	Absorbs up to 30
Other Oil-Handling Areas or Oil-Filled Equipment (e.g. flow-through process vessels at an oil production facility)					
None					

[a] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

[b] For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.

[c] For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

This is an example from USEPA's Tier I class at the 2022 CUPA Conference

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:

1) All employees are trained to do visual inspections of oil storage and transfer areas and equipment. An assigned knowledgeable employee does periodic visual inspections of the aboveground oil storage containers 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.

2) The liquid level gauges on the waste oil AST, heating oil AST, and kerosene AST are inspected and calibrated at least annually following the manufacturer's procedures by a qualified technician. The heating oil AST's mechanical vent whistle is tested with each delivery of fuel oil; the kerosene AST's liquid level gauge-activated high-level alarm is inspected monthly and functionally tested annually following manufacturer's procedures by a qualified employee. Attachment 3.1 documents these inspections.

3) An assigned employee also visually inspects the dispensers on the kerosene AST and at the gasoline island for indications of deterioration and discharges, including the transfer hoses, valves, and other fittings, at least daily following the manufacturer's procedures.

4) Employees inspect the 1,500 gal waste oil tank concrete dike on a weekly basis for signs of deterioration, discharges (e.g., from tank leaking fittings or seams and transfer spills), or accumulation of oil. In addition, employees inspect the dike containment after any heavy rainfall. These inspections are documented in Attachment 3.1. The dike containment does not have a drain for storm water. Collected rain is pumped from the dike containment and discharged to the ground only after the inspection shows that there is no oil or oil sheen present in the rainwater collected in the dike. If oil or oil sheen is detected on rainwater in the dike, the oily rainwater is pumped into the 1,500-gal waste oil tank for disposal by the waste oil hauler contractor or the contractor is requested to remove the oily rainwater in the dike for disposal. Each drainage activity is recorded in Attachment 3.3. Record keeping for disposal of waste oil or oil-contaminated water accumulated in the berm area is in Attachment 3.3 of this plan.

5) If an employee encounters a spill during an inspection of the oil storage or transfer equipment, the employee will immediately take the necessary actions outlined in Table G-7.

6) An assigned employee inspects spill kits monthly to check equipment serviceability and ensure fully stocked kits.

4. Security (excluding oil production facilities) §112.7(g):

Table G-6 Implementation and Description of Security Measures	
Security measures are implemented at this facility to prevent unauthorized access to oil handling, processing, and storage area.	☒

The following is a description of how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges:

1) The facility is open for gasoline and kerosene sales 24 hours every day and is attended around the clock.
2) All tank fill pipes are capped and locked when not in use; tanks do not have drain valves.
3) The automotive maintenance shop is open for service for 10 hours, Monday through Saturday, and the shop is locked outside business hours.
4) The dispenser pump controls are inside the gasoline sales and customer service area, attended 24 hours every day, in a locked utility room. The attendant can shut off pumps remotely from the attendant station in the sales and customer service area; the entrance to the attendant station is kept locked when the automotive maintenance shop is closed.
5) The kerosene on-tank dispenser pump control is kept locked and only facility employees are authorized to unlock, turn the pump on, and transfer kerosene into customer containers.
6) The gasoline dispensing island is lit and all facility entrances have security lights above and outside the entrances. There are also wall-mounted flood lamps that illuminate the 1,500-gal waste oil, heating oil, and kerosene AST locations.

5. Emergency Procedures and Notifications (§112.7(a)(3)(iv) and 112.7(a)(5)):

Table G-7 Description of Emergency Procedures and Notifications

The following is a description of the immediate actions to be taken by facility personnel in the event of a discharge to navigable waters or adjoining shorelines *[§112.7(a)(3)(iv) and 112.7(a)(5)]*:

1) Shutdown pumping in event of a spill during any fuel transfer operation or an emergency at the fuel dispensers.
2) Eliminate potential sources of ignition such as open flames or sparks.
3) If possible, safe, and trained to do so, identify and secure source of the discharge and contain the discharge with sorbents, sandbags, or other material from the spill kits.

    a. The main and largest spill kit is kept in the attendant area.
    b. The second spill kit is kept behind the service shop.
    c. The third spill kit is kept inside the service shop.
    d. The fourth spill kit is kept between the 1,500-gal waste oil AST dike and the 500-gal kerosene AST.

4) Contact regulatory authorities and other response personnel and organizations (see next page).

6. Contact List (§112.7(a)(3)(vi)): *This is an example from USEPA's Tier I class at the 2022 CUPA Conference*

Table G-8 Contact List	
Contact Organization / Person	**Telephone Number**
National Response Center (NRC)	1-800-424-8802
Cleanup Contractor(s) RO Co. (Waste Oil Disposal Contractor) *Owners or operators of SPCC-regulated facilities are not required to have signed contracts or agreements with cleanup contractors under the SPCC rule. Although no formal written agreement to respond is required by the SPCC rule, the owner or operator must identify phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge to navigable waters or adjoining shorelines.*	 717-888-8000
Key Facility Personnel	
Designated Person Accountable for Discharge Prevention: James Fixer, Head Mechanic	Office: 717-888-7777
	Emergency: 717-555-9190 (cell phone)
	Office:
	Emergency:
	Office:
	Emergency:
	Office:
	Emergency:
State Oil Pollution Control Agencies South Central Region PA Department of Environmental Protection (DEP)	 877-333-1904 1-800-541-2050 (Backup)
Other State, Federal, and Local Agencies EPA Region III York County Department of Emergency Services	 Office: 215-814-5000 Emergency: 1-800-424-8802 (NRC) 911
Local Fire Department	911
Local Police Department	911
Hospital Malham General Hospital, 1700 Patient Blvd., Malham, PA 17402	717-888-0811
Other Contact References (e.g., downstream water intakes or neighboring facilities) Wayne Storey, Construction Tools and Lumber Tonney Smart, Smart Auto Paint and Detailing	 717-888-6921 (Office) 717-888-0055 (Office)

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: Tank truck gasoline*, heating oil, and kerosene delivery procedures: 1) Manually gauge receiving tank to confirm liquid level in tank and quantity to be delivered to prevent tank overfill; reconcile with inventory records and ATG, as applicable. Tanks will not be filled beyond 90% of their capacity. 2) Set parking brake and use chock blocks to prevent movement; inspect fittings and fueling hose for damage before starting fuel transfer operation. The fuel delivery person makes all hook-ups. 3) Place drip pans under valve-hose fitting connections. 4) The person responsible for monitoring the delivery will remain attentive and observe the entire fuel delivery, be prepared to stop the flow of fuel from the truck to the tank at any time, and respond to any unusual condition, leak, or spill which may occur during delivery. During heating oil and kerosene unloading, monitor the tank vent whistle on the heating oil tank and the liquid high-level alarm on the kerosene tank prior to initiating and during transfer. For delivery to the fuel oil tank, shutdown delivery if the vent whistle cannot be heard or the vent whistle stops sounding. For delivery to the kerosene tank, shutdown delivery when high-level alarm goes off. Secure all valves on tank truck before truck departure and inspect for leakage. 5) Following complete delivery, the fuel delivery person is responsible for disconnecting all hook-ups. 6) Record accurate readings for product and water in tank after fuel delivery, verify the amount of fuel received and make sure fill ports are properly secured. 7) If an oil spill occurs, the spill kit will be used to contain the spill. The main spill kit is located in the gasoline sales and customer service area. The maximum spill that would occur during an overfill while unloading gasoline is estimated at 20 gallons (a 4-inch truck fuel delivery hose, 30 feet in length, holds about 20 gallons). The maximum heating oil and kerosene unload rate is 25 gallons per minute (gpm) or 0.4 gallons per second (gps); the expected maximum amount to be spilled in an overfill incident during heating oil or kerosene unloading is about 3 gallons (0.4 gps x 8 seconds maximum to shutdown fuel transfer pump). Gasoline dispenser customer fueling procedures: 1) Before dispenser filling, shutoff engine and cell phone. 2) Do not top off tank after automatic shut-off. 3) If an oil spill occurs, the spill kit will be used to contain the spill. The maximum dispenser pumping rate is 10 gpm or less than 0.2 gps. In the event of a dispenser equipment failure such as a filling hose rupture or a vehicle fuel tank overfill, the expected maximum amount to be spilled is about 2 gallons (0.2 gps x 10 seconds maximum to shutdown dispenser fuel delivery pump). Kerosene dispenser fuel transfers: 1) Customers are prohibited from operating the kerosene dispenser, including transferring kerosene into their containers; employees will transfer kerosene into only authorized containers. 2) Do not top off container when filling; shutoff and lock the dispenser pump after completing transfer. 3) If an oil spill occurs, the spill kit will be used to contain the spill. The maximum dispenser pumping rate is 5 gpm or less than 0.1 gps. In the event of a dispenser equipment failure such as a filling hose rupture or a container overfill, the expected maximum amount to be spilled is less than 0.5 gallon (0.1 gps x 5 seconds maximum to shutdown dispenser fuel delivery pump). Transfers into waste oil AST: Gauge AST (manually or via visual gauge) to confirm liquid level in tank to prevent tank overfill. Transfers into waste oil tote: Transfer all waste oil into the tote fill port using a funnel. If an oil spill occurs, the spill kit in the shop will be used to contain the spill. Transfers into oil dispensing system drums: Confirm liquid level in drum glass sight gauge before transferring oil product into drum from supplier's tote and monitor sight gauge during filling to prevent drum overfill; a drum will not be filled beyond 55 gallons. The maximum transfer rate of the supplier's pump is 7.5 gpm or 0.1 gps. In the event of an overfill incident during the transfer, the expected maximum amount to be spilled is 0.5 gallons (0.1 gps maximum transfer rate x 5 seconds maximum to shutdown transfer pump)	☒	☐

ATTACHMENT 3 – Inspections, Dike Drainage and Personnel Training Logs

This is an example from USEPA's Tier I class at the 2022 CUPA Conference

ATTACHMENT 3.1 – Inspection Log and Schedule

Table G-16 Inspection Log and Schedule

This log is intended to document compliance with §§112.6(a)(3)(iii), 112.8(c)(6), 112.8(d)(4), 112.9(b)(2), 112.9(c)(3), 112.9(d)(1), 112.9(d)(4), 112.12.(c)(6), and 112.12(d)(4), as applicable.

Date of Inspection	Container / Piping / Equipment	Describe Scope (or cite Industry Standard)	Observations	Name/ Signature of Inspector	Records maintained separately [a]
	ASTs • 1,500-gal. waste oil tank #1 • 275-gal. heating oil tank #2 • 500-gal. kerosene tank #3 • 65-gal. drums #1 to #12	Monthly and annual visual inspections as all containers meet Category 1 criteria (STI SP001, Standard for the Inspection of Aboveground Storage Tanks)			☐
	Secondary containment dike	Weekly visual inspections and after heavy rainfall			☐
	Liquid level gauges and high-level alarms	Gauges- Annual inspections and calibration following manufacturer's procedures Vent whistle- test with each delivery and at least annual inspections following manufacturer's procedures High-level alarm- monthly inspections and annual functional test following manufacturer's procedures			☐
	Dispensers	Daily visual inspections of the dispenser sumps, fill nozzles, hoses, and fittings (manufacturer instructions)			☐
	Spill kits	Monthly visual inspections and equipment/supply inventory			☐

[a] Indicate in the table above if records of facility inspections are maintained separately at this facility.

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 containment pallets.
55 to 1,100 gallons with sized secondary containment: 65-gal. steel lube and other oil product drums #1 to #12 275-gal. heating oil AST #2 500-gal. kerosene AST #3	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside bermed area 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]: 1,500-gal. waste oil AST #1	
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.

This is an example from USEPA's Tier I class at the 2022 CUPA Conference

This is an example from USEPA's Tier I class at the 2022 CUPA Conference

Spill Prevention Control and Countermeasure (SPCC) Plan

Single Horizontal Cylindrical Tank inside a rectangular or square dike or berm

Gas and Care Express **EXAMPLE**

This worksheet calculates the secondary containment volume of a rectangular or square dike or berm for a single horizontal cylindrical tank. In this example, there are no other objects or structures within the dike or berm that will displace the volume of the secondary containment.

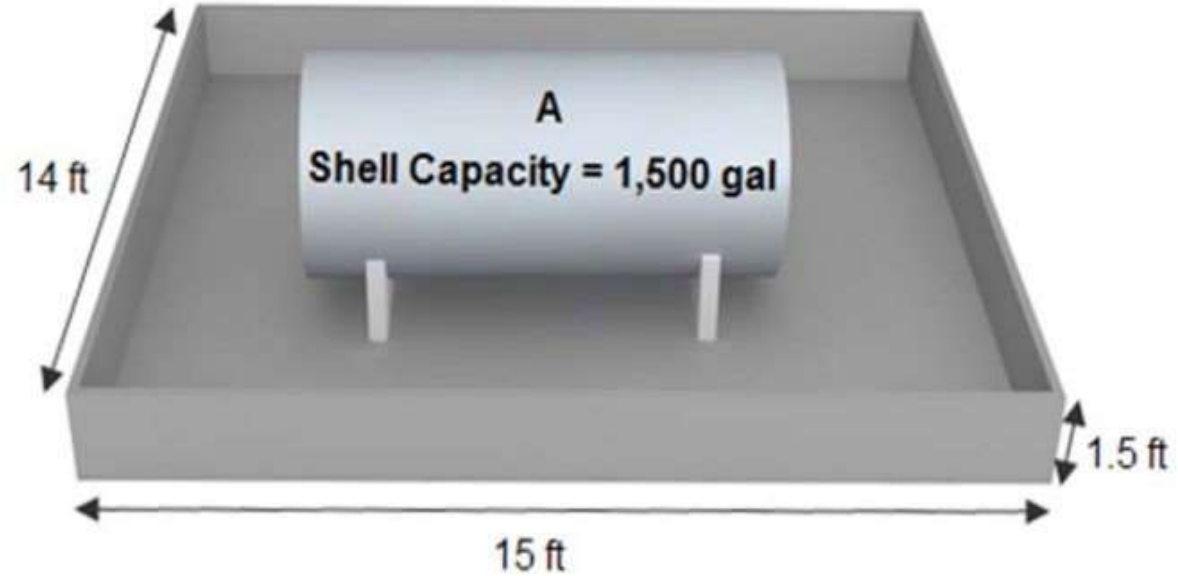
Steps:

1. Determine the volume of the secondary containment, V_{SC}
2a. Determine the volume of the tank when the tank shell capacity is unknown, V_{Tank}
2b. Determine the volume of the tank when shell capacity is known, V_{Tank}
3. Determine the percentage of the secondary containment volume, V_{SC} to the tank volume, V_{Tank}
4. Determine whether the secondary containment can contain the entire tank shell capacity with additional capacity to contain rain.

Information needed to use this worksheet:

- Tank shell capacity
  In this example, the tank is 1,500 gallons.
- Secondary containment length, width, and height
  See diagram for dimensions.
- Rainfall amount
  Rainfall can collect in the secondary containment; the selected rain event for the location is 5.6 inches.

This is an example from USEPA's Tier I class at the 2022 CUPA Conference



Disclaimer: Please note that these are simplified calculations for qualified facilities that assume:
1) the secondary containment is designed with a flat, level floor; 2) the wall height is equal for all four walls; and 3) the corners of the secondary containment system are 90 degrees. Additionally, the calculations do not include displacement for support structures or foundations.

1. Determine the volume of the secondary containment, V_{SC}

Secondary Containment Area, A_{SC} = 15 (Length, ft) x 14 (Width, ft)

= 210 ft^2 (b)

V_{SC} (ft^3) = 210 (b, ft^2) x 1.5 (Height, ft) = 315 ft^3 (c)

To convert the secondary containment volume from cubic feet to gallons for the template, then:

V_{SC} *(gallons)* = 315 (c, ft^3) x 7.48 (ft^3/gal) = 2,356 gal (c)

2a. Determine the volume of the tank when the tank shell capacity is unknown, V_{Tank}

N/A for this example because we know the volume of the tank

Tank radius (ft) = [ ] ÷ 2 = [ ] ft
Diameter (ft)

V_{Tank} *(ft³)* = 3.14 X [( )²] x [ ] = [ ] ft^3
Radius² $(ft)^2$ | Tank Height (ft) | d

2b. Determine the volume of the tank when shell capacity is known, V_{Tank}

a is the tank shell capacity from page 1

V_{Tank} (ft^3) = 1,500 x 0.1337 = 200.5 ft^3
a (gal) | ft^3/gal | e

3. Determine the percentage of the secondary containment volume, V_{SC} to the tank volume, V_{Tank}[1] (to determine whether the volume of the containment is sufficient to contain the tank's entire shell capacity).

c is the secondary containment volume
d / e is the tank volume calculated in Step 2 of this worksheet

V_{SC}/V_{Tank} = 315 (c, ft^3) ÷ 200.5 (d or e, ft^3) = 1.57 (f)

% = 1.57 (f) x 100 = 157 (g)

Percentage, **g**, is 157% which is greater than 100%. The capacity of the secondary containment is sufficient to contain the shell capacity of the tank. However, we must also account for rain that can collect in the dike or berm. See Step 4.

This is an example from USEPA's Tier I class at the 2022 CUPA Conference

4. Determine whether the secondary containment can contain the entire tank shell capacity with additional capacity to contain rain.

If rain can collect in a dike or berm, the SPCC rule requires that secondary containment for bulk storage containers have additional capacity to contain rainfall or freeboard. The rule does not specify a method to determine the additional capacity required to contain rain or the size of the rain event for designing secondary containment. However, industry practice often considers a rule of thumb of 110% of the tank capacity to account for rainfall. A dike with a 110% capacity of the tank may be acceptable depending on the shell size of the tank, local precipitation patterns, and frequency of containment inspections. In a different geographic area, a dike or berm designed to hold 110% for the same size tank may not have enough additional containment capacity to account for a typical rain event in that area. The 110% standard may also not suffice for larger storm events. If you want to determine a conservative capacity for a rain event, you may want to consider a 24-hour 25-year storm event. It is the responsibility of the owner or operator[2] to determine the additional containment capacity necessary to contain rain. A typical rain event may exceed the amount determined by using a 110% "rule of thumb" so it is important to consider the amount of a typical rain event when designing or assessing your secondary containment capacity.

Rainfall data may be available from various sources such as local water authorities, local airports, and the National Oceanic and Atmospheric Administration (NOAA).

Selected Rainfall Event:

24— Hr 25— Yr Rainfall (in) = 5.6 (**h**) in

Rainfall (ft) = 5.6 (h (in)) ÷ 12 (in/ft)

0.5 (**i**) ft

Volume of Rain to be Contained, V_{Rain} (ft^3) = 0.5 (i (ft)) x 210 (b (ft^2)) = 105 (**j**) ft^3

b is the area of secondary containment calculated in Step 1 of this worksheet

Total Containment Capacity Required (ft^3) = 105 (j (ft^3)) + 200.5 (d or e (ft^3))

d / e is the tank volume calculated in Step 2 of this worksheet

305.5 (**k**) ft^3

The volume of the secondary containment in **c** is 315 ft^3, which is greater than the required containment capacity in **k** (305.5ft^3). Therefore, the secondary containment is sufficient to contain the shell capacity of the tank and has sufficient additional capacity to contain a typical rainfall amount.

U.S. ENVIRONMENTAL PROTECTION AGENCY
TIER I QUALIFIED FACILITY SPCC PLAN TEMPLATE

Instructions to Complete this Template

This template is intended to help the owner or operator of a Tier I qualified facility develop a self-certified Spill Prevention, Control, and Countermeasure (SPCC) Plan. To use this template, your facility must meet all of the applicability criteria of a Tier I qualified facility listed under §112.3(g)(1) of the SPCC rule. This template provides every SPCC rule requirement necessary for a Tier I qualified facility, which you must address and implement.

You may use this template to comply with the SPCC regulation or use it as a model and modify it as necessary to meet your facility-specific needs. If you modify the template, your Plan must include a section cross-referencing the location of each applicable requirement of the SPCC rule and you must ensure that your Plan is an equivalent Plan that meets all applicable rule requirements of 40 CFR 112.6(a)(3).

You may complete this template either electronically or by hand on a printed copy. This document is a reformatted version of the template found in Appendix G of 40 CFR part 112.[a] No substantive changes have been made. Please note that a "Not Applicable" ("N/A") column has been added to both Table G-10 (General Rule Requirements for Onshore Facilities) and Table G-11 (General Rule Requirements for Onshore Oil Production Facilities). The "N/A" column should help you complete your self-certification when a required rule element does not apply to your facility. Use of the "N/A" column is optional and is not required by rule.

All Tier I qualified facility self-certifiers must complete Sections I, II, and III. Additionally, the owner or operator of an:

- Onshore facility (excluding production) must complete Section A.
- Onshore oil production facility (excluding drilling and workover facilities) must complete Section B.
- Onshore oil drilling and workover facility must complete Section C.

Complete and include with your Plan the appropriate attachments. You should consider printing copies of the attachments for use in implementing the SPCC Plan (e.g. Attachment 3.1 - Inspection Log & Schedule; Attachment 4 - Discharge Notification Form).

To complete the template, check the box next to the requirement to indicate that it has been adequately addressed. Either write “N/A” in the column or check the box under the “N/A” column to indicate those requirements that are not applicable to the facility. Where a section requires a description or listing, write in the spaces provided (or attach additional descriptions if more space is needed).

Below is a key for the colors used in the section headers:

Sections I, II, and III: Required for all Tier I qualified facilities
Section A: Onshore facilities (excluding production)
Section B: Onshore oil production facilities (excluding drilling and workover facilities)
Section C: Onshore oil drilling and workover facilities
Attachments: 1 - Five Year Review and Technical Amendment Logs 2 - Oil Spill Contingency Plan and Checklist 3 - Inspections, Dike Drainage and Personnel Training Logs 4 - Discharge Notification Form

After you have completed all appropriate sections, certify and date your Plan, and then implement it by the compliance date. If your facility was in operation before August 16, 2002, and you do not already have a Plan, then implement this template immediately. Conduct inspections and tests in accordance with the written procedures that you have developed for your facility. You must keep with the SPCC Plan a record of these inspections and tests, signed by the appropriate supervisor or inspector, for a period of three years.

Do not forget to periodically review your Plan (at least once every five years) or to update it when you make changes to your facility. You must prepare amendments within six months of the facility change, and implement them as soon as possible, but not later than six months following preparation of any amendment.

In the event that your facility releases oil to navigable waters or adjoining shorelines, immediately call the National Response Center (NRC) at 1-800-424-8802. The NRC is the federal government's centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel.

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[a] Please note that the use of this template is not mandatory for a Tier I qualified facility. You may also meet the SPCC Plan requirement by preparing a satisfactory Tier II qualified facility Plan, preparing a satisfactory Plan that is certified by a Professional Engineer, or by developing an equivalent Plan for a Tier I qualified facility. Further information on the requirements of these methods can be found in 40 CFR part 112.6(a)(1). If you use any of these alternative methods you must include a cross reference in your Plan that shows how the equivalent Plan meets all applicable 40 CFR part 112 requirements.

Tier I Qualified Facility SPCC Plan

This template constitutes the SPCC Plan for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in §112.3(g)(1). This template addresses the requirements of 40 CFR part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design and construction) and obtain professional assistance, as appropriate.

Facility Description

Facility Name _____

Facility Address _____

City _____ State _____ ZIP _____

County _____ Tel. Number ( ) -

Owner or Operator Name _____

Owner or Operator Address _____

City _____ State _____ ZIP _____

County _____ Tel. Number ( ) -

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.

I also understand my other obligations relating to the storage of oil at this facility, including, among others:

1. To report any oil discharge to navigable waters or adjoining shorelines to the appropriate authorities. Notification information is included in this Plan.
2. To review and amend this Plan whenever there is a material change at the facility that affects the potential for an oil discharge, and at least once every five years. Reviews and amendments are recorded in an attached log [See Five Year Review Log and Technical Amendment Log in Attachments 1.1 and 1.2.]
3. Optional use of a contingency plan. A contingency plan:
    a. May be used in lieu of secondary containment for qualified oil-filled operational equipment, in accordance with the requirements under §112.7(k), and;
    b. Must be prepared for flowlines and/or intra-facility gathering lines which do not have secondary containment at an oil production facility, and;
    c. Must include an established and documented inspection or monitoring program; must follow the provisions of 40 CFR part 109; and must include a written commitment of manpower, equipment and materials to expeditiously remove any quantity of oil discharged that may be harmful. If applicable, a copy of the contingency plan and any additional documentation will be attached to this Plan as Attachment 2.

I certify that I have satisfied the requirement to prepare and implement a Plan under §112.3 and all of the requirements under §112.6(a). I certify that the information contained in this Plan is true.

Signature _____ Title: _____

Name _____ Date: ___/___/ 20_____

II. Record of Plan Review and Amendments

Five Year Review (§112.5(b)):

Complete a review and evaluation of this SPCC Plan at least once every five years. As a result of the review, amend this Plan within six months to include more effective prevention and control measures for the facility**,** if applicable. Implement any SPCC Plan amendment as soon as possible**,** but no later than six months following Plan amendment. Document completion of the review and evaluation, and complete the Five Year Review Log in Attachment 1.1. If the facility no longer meets Tier I qualified facility eligibility, the owner or operator must revise the Plan to meet Tier II qualified facility requirements, or complete a full PE certified Plan.

Table G-1 Technical Amendments (§§112.5(a), (c) and 112.6(a)(2))	
This SPCC Plan will be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects the potential for a discharge to navigable waters or adjoining shorelines. Examples include adding or removing containers, reconstruction, replacement, or installation of piping systems, changes to secondary containment systems, changes in product stored at this facility, or revisions to standard operating procedures.	☐
Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template. *[§112.6(a)(2)]* **[See Technical Amendment Log in Attachment 1.2]**	☐

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)**

Total Aboveground Storage Capacity [c] _____ gallons
Total Completely Buried Storage Capacity _____ gallons
Facility Total Oil Storage 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.

[c] Counts toward qualified facility applicability threshold.

2. Secondary Containment and Oil Spill Control (§§112.6(a)(3)(i) and (ii), 112.7(c) and 112.9(c)(2)):

Table G-3 Secondary Containment and Oil Spill Control	
Appropriate secondary containment and/or diversionary structures or equipment[a] is provided for all oil handling containers, equipment, and transfer areas to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs.	☐

[a] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided.

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)
Bulk Storage Containers and Mobile/Portable Containers[b]					
Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)[c]					
Piping, Valves, etc.					
Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)					
Other Oil-Handling Areas or Oil-Filled Equipment (e.g. flow-through process vessels at an oil production facility)					

[a] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

[b] For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.

[c] For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

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, 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]**	☐

4. Security (excluding oil production facilities) §112.7(g):

Table G-6 Implementation and Description of Security Measures	
Security measures are implemented at this facility to prevent unauthorized access to oil handling, processing, and storage area.	☐
The following is a description of how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges:	

5. Emergency Procedures and Notifications (§112.7(a)(3)(iv) and 112.7(a)(5)):

Table G-7 Description of Emergency Procedures and Notifications
The following is a description of the immediate actions to be taken by facility personnel in the event of a discharge to navigable waters or adjoining shorelines *[§112.7(a)(3)(iv) and 112.7(a)(5)]*:

6. Contact List (§112.7(a)(3)(vi)):

Table G-8 Contact List	
Contact Organization / Person	**Telephone Number**
National Response Center (NRC)	1-800-424-8802
Cleanup Contractor(s)	
Key Facility Personnel	
Designated Person Accountable for Discharge Prevention:	Office:
	Emergency:
	Office:
	Emergency:
	Office:
	Emergency:
	Office:
	Emergency:
State Oil Pollution Control Agencies	
Other State, Federal, and Local Agencies	
Local Fire Department	
Local Police Department	
Hospital	
Other Contact References (e.g., downstream water intakes or neighboring facilities)	

7. NRC Notification Procedure (§112.7(a)(4) and (a)(5)):

Table G-9 NRC Notification Procedure	
In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information identified in Attachment 4 will be provided to the National Response Center immediately following identification of a discharge to navigable waters or adjoining shorelines **[See Discharge Notification Form in Attachment 4]**: *[§112.7(a)(4)]*	☐

- The exact address or location and phone number of the facility;
- Date and time of the discharge;
- Type of material discharged;
- Estimate of the total quantity discharged;
- Estimate of the quantity discharged to navigable waters;
- Source of the discharge;
- Description of all affected media;
- Cause of the discharge;
- Any damages or injuries caused by the discharge;
- Actions being used to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation may be needed; and
- Names of individuals and/or organizations who have also been contacted.

8. SPCC Spill Reporting Requirements (Report within 60 days) (§112.4):

Submit information to the EPA Regional Administrator (RA) and the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located within 60 days from one of the following discharge events:

A single discharge of more than 1,000 U.S. gallons of oil to navigable waters or adjoining shorelines or
Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons of oil occurring within any twelve month period

You must submit the following information to the RA:

(1) Name of the facility;
(2) Your name;
(3) Location of the facility;
(4) Maximum storage or handling capacity of the facility and normal daily throughput;
(5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
(6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
(7) The cause of the reportable discharge, including a failure analysis of the system or subsystem in which the failure occurred; and
(8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence
(9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

* * * * *

NOTE: Complete one of the following sections (A, B or C) as appropriate for the facility type.

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-10 General Rule Requirements for Onshore Facilities		N/A
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)]*	☐	☐
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)]*	☐	☐
Secondary containment for the bulk storage containers (including mobile/portable oil storage containers) holds the capacity of the largest container plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). *[§112.6(a)(3)(ii)]*	☐	☐
If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following procedures will be implemented at the facility: *[§§112.8(c)(3) and 112.12(c)(3)]*		
• Bypass valve is normally sealed closed	☐	☐
• 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 under responsible supervision	☐	☐
• Adequate records of drainage are kept **[See Dike Drainage Log in Attachment 3.3]**	☐	☐
For completely buried metallic tanks installed on or after January 10, 1974 at this facility *[§§112.8(c)(4) and 112.12(c)(4)]*:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☐
• Regular leak testing is conducted.	☐	☐
For partially buried or bunkered metallic tanks *[§112.8(c)(5) and §112.12(c)(5)]*:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☐
Each aboveground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Scope and frequency of the inspections and inspector qualifications are in accordance with industry standards. Container supports and foundations are regularly inspected. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.8(c)(6) and §112.12(c)(6)(i)]*	☐	☐
Outsides of bulk storage containers are frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(c)(6) and 112.12(c)(6)]*	☐	☐
For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are documented. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.12(c)(6)(ii)]*	☐	☐

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:	☐	☐
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)]*	☐	☐
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. *[§§112.8(c)(10) and 112.12(c)(10)]*	☐	☐
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. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☐	☐
Integrity and leak testing are conducted on buried piping at the time of installation, modification, construction, relocation, or replacement. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☐	☐

B. Onshore Oil Production Facilities (excluding drilling and workover facilities) (§112.9(b), (c), and (d)):

The owner or operator must meet the general rule requirements as well as the requirements under this section. Note that not all provisions may be applicable to all owners/operators. **In cases where a provision is not applicable, write "N/A".**

Table G-11 General Rule Requirements for Onshore Oil Production Facilities		N/A
At tank batteries, separation and treating areas, drainage is closed and sealed except when draining uncontaminated rainwater. Accumulated oil on the rainwater is returned to storage or disposed of in accordance with legally approved methods. *[§112.9(b)(1)]*	☐	☐
Prior to drainage, diked areas are inspected and *[§112.9(b)(1)]*: • Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters • Bypass valve is opened and resealed under responsible supervision • Adequate records of drainage are kept **[See Dike Drainage Log in Attachment 3.3]**	☐ ☐ ☐	☐ ☐ ☐
Field drainage systems and oil traps, sumps, or skimmers are inspected at regularly scheduled intervals for oil, and accumulations of oil are promptly removed **[See Inspection Log and Schedule in Attachment 3.1]** *[§112.9(b)(2)]*	☐	☐
The containers used at this facility are compatible with materials stored and conditions of storage. *[§112.9(c)(1)]*	☐	☐
All tank battery, separation, and treating facility installations (except for flow-through process vessels) are constructed with a capacity to hold the largest single container plus additional capacity to contain rainfall. Drainage from undiked areas is safely confined in a catchment basin or holding pond. *[§112.9(c)(2)]*	☐	☐
Except for flow-through process vessels, containers that are on or above the surface of the ground, including foundations and supports, are visually inspected for deterioration and maintenance needs on a regular schedule. **[See Inspection Log and Schedule in Attachment 3.1]** *[§112.9(c)(3)]*	☐	☐
New and old tank batteries at this facility are engineered/updated in accordance with good engineering practices to prevent discharges including at least one of the following: i. adequate container capacity to prevent overfill if regular pumping/gauging is delayed; ii. overflow equalizing lines between containers so that a full container can overflow to an adjacent container; iii. vacuum protection to prevent container collapse; or iv. high level sensors to generate and transmit an alarm to the computer where the facility is subject to a computer production control system. *[§112.9(c)(4)]*	☐	☐
Flow-through process vessels and associated components are: • Are constructed with a capacity to hold the largest single container plus additional capacity to contain rainfall. Drainage from undiked areas is safely confined in a catchment basin or holding pond; *[§112.9(c)(2)]* and • That are on or above the surface of the ground, including foundations and supports, are visually inspected for deterioration and maintenance needs on a regular schedule. **[See Inspection Log and Schedule in Attachment 3.1]** *[§112.9(c)(3)]* *Or* • Visually inspected and/or tested periodically and on a regular schedule for leaks, corrosion, or other conditions that could lead to a discharge to navigable waters; and • Corrective action or repairs are applied to flow-through process vessels and any associated components as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge; and • Any accumulations of oil discharges associated with flow-through process vessels are promptly removed; and • Flow-through process vessels are provided with a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation within six months of a discharge from flow-through process vessels of more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b), or a discharge more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b) within any twelve month period. *[§112.9(c)(5)]* *(Leave blank until such time that this provision is applicable.)*	☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐

Table G-11 General Rule Requirements for Onshore Oil Production Facilities		N/A
All aboveground valves and piping associated with transfer operations are inspected periodically and upon a regular schedule. 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 are included in the inspection. **[See Inspection Log and Schedule in Attachment 3.1]** *[§112.9(d)(1)]*	☐	☐
An oil spill contingency plan and written commitment of resources are provided for flowlines and intra-facility gathering lines **[See Oil Spill Contingency Plan and Checklist in Attachment 2 and Inspection Log and Schedule in Attachment 3.1]** *[§112.9(d)(3)]* or Appropriate secondary containment and/or diversionary structures or equipment is provided for flowlines and intra-facility gathering lines to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from the pipe, will not escape the containment system before cleanup occurs.	☐ ☐	☐ ☐
A flowline/intra-facility gathering line maintenance program to prevent discharges from each flowline has been established at this facility. The maintenance program addresses each of the following: • 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; • Flowlines, 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). The frequency and type of testing allows for the implementation of a contingency plan as described under part 109 of this chapter. • Corrective action and repairs to any flowlines and intra-facility gathering lines and associated appurtenances as indicated by regularly scheduled visual inspections, tests, or evidence of a discharge. • Accumulations of oil discharges associated with flowlines, intra-facility gathering lines, and associated appurtenances are promptly removed. *[§112.9(d)(4)]*	☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐
The following is a description of the flowline/intra-facility gathering line maintenance program implemented at this facility:		

C. Onshore Oil Drilling and Workover Facilities (§112.10(b), (c) and (d)):

The owner or operator must meet the general rule requirements as well as the requirements under this section.

Table G-12 General Rule Requirements for Onshore Oil Drilling and Workover Facilities	
Mobile drilling or worker equipment is positioned or located to prevent discharge as described in §112.1(b). *[§112.10(b)]*	☐
Catchment basins or diversion structures are provided to intercept and contain discharges of fuel, crude oil, or oily drilling fluids. *[§112.10(c)]*	☐
A blowout prevention (BOP) assembly and well control system was installed before drilling below any casing string or during workover operations. *[§112.10(d)]*	☐
The BOP assembly and well control system is capable of controlling any well-head pressure that may be encountered while the BOP assembly and well control system are on the well. *[§112.10(d)]*	☐

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	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	

ATTACHMENT 1.2 – Technical Amendment Log

Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template.

Table G-15 Description and Certification of Technical Amendments

Review Date	Description of Technical Amendment	Name and signature of person certifying this technical amendment

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.	☐

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.	☐
(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., 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 which 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) Predesignation 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.	☐
(6) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.	☐

[a] The contingency plan must be consistent with all applicable state and local plans, Area Contingency Plans, and the National Contingency Plan (NCP)

ATTACHMENT 3 – Inspections, Dike Drainage and Personnel Training Logs

ATTACHMENT 3.1 – Inspection Log and Schedule

Table G-16 Inspection Log and Schedule
This log is intended to document compliance with §§112.6(a)(3)(iii), 112.8(c)(6), 112.8(d)(4), 112.9(b)(2), 112.9(c)(3), 112.9(d)(1), 112.9(d)(4), 112.12.(c)(6), and 112.12(d)(4), as applicable.

Date of Inspection	Container / Piping / Equipment	Describe Scope (or cite Industry Standard)	Observations	Name/ Signature of Inspector	Records maintained separately [a]
					☐
					☐
					☐
					☐
					☐

[a] Indicate in the table above if records of facility inspections are maintained separately at this facility.

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.

ATTACHMENT 3.3 – Dike Drainage Log

Table G-18 Dike Drainage Log

Date	Bypass valve sealed closed	Rainwater inspected to be sure no oil (or sheen) is visible	Open bypass valve and reseal it following drainage	Drainage activity supervised	Observations	Signature of Inspector
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		

ATTACHMENT 3.4 – Oil-handling Personnel Training and Briefing Log

Table G-19 Oil-Handling Personnel Training and Briefing Log		
Date	**Description / Scope**	**Attendees**

ATTACHMENT 4 – Discharge Notification Form

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information will be provided to the National Response Center **[also see the notification information provided in Section 7 of the Plan]**:

Table G-20 Information provided to the National Response Center in the Event of a Discharge			
Discharge/Discovery Date		Time	
Facility Name			
Facility Location (Address/Lat-Long/Section Township Range)			
Name of reporting individual		Telephone #	
Type of material discharged		Estimated total quantity discharged	Gallons/Barrels
Source of the discharge		Media affected	☐ Soil ☐ Water (specify) ☐ Other (specify)
Actions taken			
Damage or injuries	☐ No ☐ Yes (specify)	Evacuation needed?	☐ No ☐ Yes (specify)
Organizations and individuals contacted	☐ National Response Center 800-424-8802 Time ☐ Cleanup contractor (Specify) Time ☐ Facility personnel (Specify) Time ☐ State Agency (Specify) Time ☐ Other (Specify) Time		