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DIY SPCC Plans for Tier I Qualified Facilities

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TO REVIEW

- SPCC Plan Basics
- Applicability
- EPA Resources
- Defining a “Qualified Facility”
- Oil Inventory
- Review of Tier I SPCC Plan Streamlined Template
- Final Thoughts

SPCC PLAN BASICS

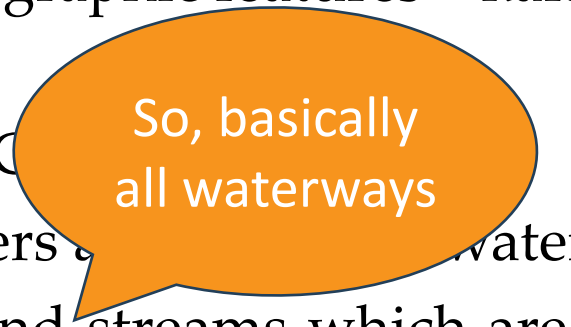
- Spill Prevention, Control, and Countermeasures (SPCC) Plan includes:
  - Description of oil handling processes
  - Spill prevention measures
  - Discharge and drainage
  - Resources for preventing an oil discharge to waterways
  - Oil inventory
  - Monthly Inspections
  - Annual Training
  - Periodic review and revisions

SPCC PLAN APPLICABILITY

- Applicability for MS4 Facilities:
  - Is the total aggregate capacity of aboveground oil storage containers (≥ 55-gallon capacity) greater than 1,320 gallons of oil?
  - Is the total aggregate capacity of completely buried storage tanks greater than 42,000 gallons of oil? (≥ 55-gallons and tanks not subject to UST Regulations)
  - Could the facility reasonably be expected to discharge oil in quantities that may be harmful into navigable waters or adjoining shorelines?
    - 40 CFR 110 defines a discharge of oil that:
      - Causes a sheen or discoloration on the surface of the water
      - Causes a sludge or emulsion to be deposited to the water's surface or
      - Violates a water quality standard

SPCC PLAN APPLICABILITY

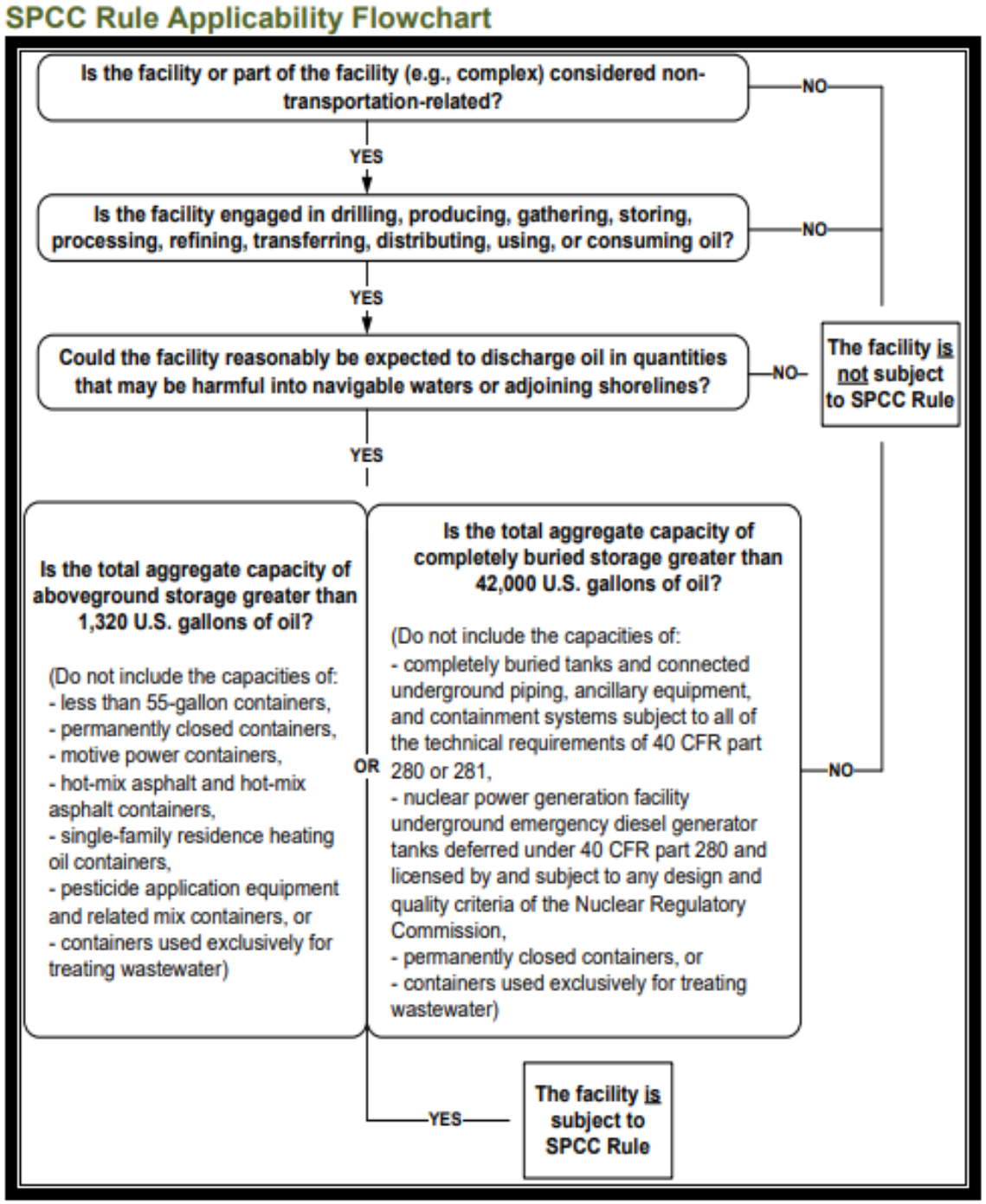
- "Reasonably be Expected" is not defined, but should consider:
  - Past discharges
  - Facility location, quantities stored
  - On-site conduits and underground features – sanitary sewers, storm sewers, utility lines, groundwater protection area
  - Unique geological or geographic features – karst
  - Precipitation runoff
- "Navigable Waters" for SPCC
  - All actual navigable waters a… …Waters
  - Intrastate lakes, rivers, and streams which are utilized by interstate travelers for recreational or other purposes; and
  - Intrastate lakes, rivers, and streams from which fish or shellfish are taken and sold in interstate commerce.



SPCC PLAN APPLICABILITY

- Non-Transportation Related means onshore (land) storage or use of oils; not in an INDOT capacity or transported across roadways

- If YES, then your facility needs an SPCC Plan



USEPA RESOURCES

- EPA Resources – included in app
  - USEPA SPCC Qualified Facilities Applicability – fact sheet
  - USEPA Tier I Qualified Facility SPCC Plan Template (sample) Word
  - USEPA Tier I Qualified Facility SPCC Plan Template (blank) PDF
- Other Resources:
  - Garage Scenario, Garage Diagram & Sample Tier I Qualified Facility SPCC Plan
  - SPCC Guidance for Regional Inspectors
  - Example calculations for cylindrical tanks and vertical tanks

WHAT IS A QUALIFIED FACILITY?

Qualified Facility Applicability

If the facility total aboveground oil storage capacity is 10,000 gallons or less…		
And…	**And the facility has…**	**Then the facility is a:**
In the three years before the SPCC Plan is certified, the facility has had no discharges to navigable waters or adjoining shorelines as described below: • A single discharge of oil greater than 1,000 gallons, or • Two discharges of oil each greater than 42 gallons within any 12-month period.	No individual aboveground oil containers greater than 5,000 gallons;	**Tier I Qualified Facility:** Complete and self-certify Plan template (Appendix G to 40 CFR part 112) in lieu of a full PE-certified Plan or other self-certified SPCC Plan.
	Any individual aboveground oil container greater than 5,000 gallons;	**Tier II Qualified Facility:** Prepare a self-certified Plan in accordance with all applicable requirements of §112.7 and subparts B or C of the rule, in lieu of a PE-certified Plan.

- Refers to the amount that have actively reached a navigable water (waterway), not total amount spilled

WHAT IS A QUALIFIED FACILITY?

- **SPCC Rule provides streamlined requirements for certain facilities:**
  - **Smaller onsite storage amounts – less than 10,000 gallons total aboveground capacity**
  - **Sites with no past discharges to navigable water**
  - **No individual container >5,000 gallons**
- Allowed to prepare and self-certify
  - Meaning an outside consultant and Professional Engineer is not required to develop and certify your SPCC Plan
- Two types of qualified facilities – Tier I and II
- Determine which by knowing:
  - Total aboveground and underground oil storage capacity at the facility
  - Spill information and history for past 3 years

Types of oil:

Fats, Oils and Grease from Animals and Fish

Vegetable Oil

Nut and Seed Oil

Petroleum

Gasoline

Diesel Fuel

Fuel Oil

Synthetic Oil

Mineral Oil

Used/Waste Oils

Oily Water

Oily Sludge

OIL INVENTORY

The template has a handy form to complete the inventory

Determine how m the following:

1) Mobile/Portable C rums, totes and farm tanks
2) Aboveground tan ed, tanks in vaults, and bunkered tanks
3) Non-transportation trucks (used solely at the site), mobile refuelers
4) Oil-filled electrical and operating equipment (hydraulic systems, transformers, lubricating systems, etc.)

Exempt:

1) Containers less than 55-gallon capacity
2) Permanently closed containers, new containers not used yet
3) Motive power containers (vehicle fuel tanks)
4) Hot-mix asphalt or any hot-mix asphalt container
5) Underground storage tanks (40 CFR 280/281)

PROVIDED FORM

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	Diesel, off-road	2,500
A – Horizontal, single wall, cylindrical UL-142 steel tank #2 on concrete saddles and pad	Diesel, on-road	2,500
A – Horizontal, single wall, cylindrical UL-142 steel tank #3 on concrete saddles and pad	Gasoline	500
A – Vertical, single wall, cylindrical UL 142 steel tank #4 on ground	Slop oil	1,200
A – Steel tank mounted on trailer	Diesel, off-road	500
A – Steel tank mounted on pickup truck	Diesel, on-road	115
Polyethylene tote #1 (single use)	Motor oil	250
olyethylene tote #2 (single use)	Waste oil	250
teel drum #1 (single use)	Hydraulic oil	55
teel drum #2 (single use)	Lubrication oil	55
drum for adjuvant oil	Adjuvant oil	55
ingle wall, cylindrical UL 58 steel	Gasoline	500

Total Aboveground Storage Capacity [c] 7980 gallons
Total Completely Buried Storage Capacity 500 gallons
Facility Total Oil Storage Capacity 8480 gallons

The template allows for you to enter more lines into the table

Oil/Water Separators at MS4 facilities are exempt from capacity calculations as they are used as a treatment method and/or secondary containment

SPILL HISTORY

- Determine if a spill has occurred in the past 3 years
  - Does not include spills contained inside a building; leaks and drips that have been cleaned up
  - Does not include discharges resulting from natural disasters
  - Must reach a navigable water – stream, any sewer, runoff with a sheen
  - Discharging to a combined/sanitary sewer is not a reason that a spill cannot be discharged to a navigable water
- How much was discharged to a navigable water?
  - Two discharges of oil to a navigable water each >42 gallons within 12 months of each other
  - A single discharge >1,000 gallons to a navigable water

TIER I QUALIFIED FACILITY

- TIER I = less than 10,000 gallons of total above/underground storage, < 5,000 gallons container size, and no qualifying spills
  - Use the streamlined SPCC Plan Template -> www.epa.gov/oilspill
- TIER II = less than 10,000 gallons of total above/underground storage, > 5,000 gallons container size, and no qualifying spills
  - Develop full SPCC Plan per rule but may choose to self-certify instead of a professional engineer certifying. Owner (Mayor) self-certifies:
    - The Plan has been prepared in accordance with accepted and sound industry practices and standards and with the rule requirements;
    - Procedures for required inspections and testing have been established;
    - The Plan is being fully implemented;
    - The facility meets the qualifying criteria;
    - The Plan does not deviate from rule requirements except as allowed and as certified by a PE; and
    - Management approves the Plan and has committed resources to implement it.

INSTRUCTIONS

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

Please note: Editorial comments for the purposes of this guidance document are identified by red italicized text to distinguish this information from the template text.

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.[8] 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-ification when a required rule element does not apply to your facility. Use of the "N/A" column is optional and is not required le.

This would be an MS4

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.

This example Plan does not include Sections B and C. These sections are not applicable to the farm addressed in this sample Plan.

INSTRUCTIONS

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).¶

Both would apply to MS4s

ey·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·any·amendment.¶

SELF-CERTIFICATION

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 THE MAYOR 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.

SELF-CERTIFICATION

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 *John Doe* Title: THE MAYOR

Name John Doe Date: 09/15/2023

GENERAL INFORMATION

- Basic information; likely have in your SWQMP – responsible entities list or SWPPP

Tier I Qualified Facility SPCC Plan

Facility information in this example SPCC Plan is identified by blue text to distinguish this information from the template text.

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	Doe's Family Farm				
Facility Address	2024 South Buerkle Street				
City	Stuttgart	State	AR	ZIP	72160-6508
County	Arkansas	Tel. Number	(870) 163 – 1651		
Owner or Operator Name	John Doe				
Owner or Operator Address	2024 South Buerkle Street				
City	Stuttgart	State	AR	ZIP	72160-6508
County	Arkansas	Tel. Number	(870) 163 – 1651		
Owner or operator Name	Same as above				
Owner or Operator Address	Same as above				
City		State		ZIP	

PLAN REVIEW AND AMENDMENTS

- Complete review at least every 5 years; amend after facility changes within 6 months

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]**	☒

PROVIDED FORMS

ATTACHMENT 1 – Five Year Review and Technical Amendment Logs

ATTACHMENT 1.1 – Five Year Review Log

By signing below, I am certifying that I have completed a review and evaluation of the SPCC Plan for this facility, and will/will not am this Plan as a result.

An owner or operator must review and evaluate the SPCC Plan at least once every five years from the signature date of the Plan. A review of the Plan must also be completed whenever there is a change in the facility which affects the potential for a discharge of oil. In addition, the owner or operator has to amend the Plan within six months of review to include more effective prevention and control technology if the technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge to navigable waters or adjoining shorelines. The owner or operator must implement any Plan amendment resulting from the review as soon as possible, but no longer than six months after the amendment.

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	
	☐	☐	
	☐		

Meaning moving/adding oil storage areas or containers

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

Would not include name changes, oil names, etc.

SECONDARY CONTAINMENT

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.

Secondary containment structures, e.g., dikes or berms, can be constructed with various materials such as: metal, concrete, earthen materials, liners, asphalt, and other coatings. Although different materials can be used, the material and containment construction must enable the secondary containment structure to prevent discharges to navigable waters or adjoining shorelines. For the secondary containment structure to serve this purpose, it must be able to contain the oil spill until it is cleaned up. Whether it can do this depends primarily on the ability of the containment material to slow down or prevent the flow of the spill through the material, (i.e., the material's imperviousness to the spill). Note that the rule does not specify how to design the secondary containment system to meet the impervious standard. The facility owner or operator determines how best to provide secondary containment based on good industry practices, oil product properties, and other specific factors and conditions at the facility.

Note that EPA considers shop-fabricated double-walled tanks that employ overfill and leak detection measures and are constructed to industry standards as meeting the secondary containment requirements in the SPCC rule. This clarification can be found in EPA Memorandum, Subject: Use of Alternative Secondary Containment Measures at Facilities Regulated under the Oil Pollution Prevention Regulation (40 CFR Part 112), OSWER 9360.8-38, More detailed information on secondary containment, including design and construction, is available in the SPCC Guidance for Regional Inspectors, EPA 550-B-05-001, at http://www.epa.gov/emergencies/content/spcc/spcc_guidance.htm.

SECONDARY CONTAINMENT TERMS

- GENERAL – addresses the most likely discharge from mobile refuelers, oil-filled operational or pr[illegible]nt, non-transportation tank trucks, transfer areas, and piping --- Sources [illegible]urned off
- SPECIFIC/SIZED – addresses major container failures from bulk storage containers, mobile/portable containers, and tank batteries --- sized for entire contents
- ACTIVE (measures deployed in a timely manner after a spill occurs) – temporary barriers (soil berm around active spill), spill mats, drain covers, oil-dri, drip pans
- PASSIVE (permanent barriers) – dikes, berms, retaining walls, curbing, trenches, retention ponds, sumps, buildings
- SUFFICIENTLY IMPERVIOUS [illegible]capable of containing oil and must be constructed so that any dis[illegible]e before clean up occurs

Drums & Totes

Does not mean indefinitely, just long enough to cleanup

SECONDARY CONTAINMENT

- Inside Storage – Could use multiple methods to contain entire contents – building, containment pallet, trench, etc.
- Drums & totes to have containment for largest capacity of largest container
  - Example: 4 drums on a pallet -> Must be able to contain 55-gallons

Spill Containment Workstation - 2 Drum

Low-profile workstations protect floors from spills and leaks from 55-gallon drums.

- Configure drum handling and dispensing areas.
- Tough, **high-density polyethylene** construction.
- Resists chemicals, rust and corrosion.
- Withstands extreme temperatures -20° to 120°F.
- Non-skid, easy-to-clean removable grates.
- Meets EPA, SPCC and NPDES regulations.

24 Gallons
$170

More Images & Video

MODEL NO.	DESCRIPTION	DIMENSIONS L x W x H	LOAD CAP. (LBS.)	SUM CAP.	WT. (LBS.)	PRICE EACH 1	PRICE EACH 3+	IN STOCK SHIPS TODAY
H-4036	2 Drum	49 x 25 x 6"	2,500	24 Gal.	33	$170	$160	1 ADD

SHIPS VIA MOTOR FREIGHT

66 Gallons
$500

(0) Write a review Ask a question

4 Drum Plastic Pallet With Dra

Model No: 1645

$500.00

Login to view discounted pricing

− 1 +

Need a bulk or special or

Compliance

SUPPORTS SPC

SECONDARY CONTAINMENT

- Inside Storage – the impervious floors/wall may serve as containment
  - Don't store near entrances/doorways or high traffic areas

Recommend Moving – signs of drips, poor housekeeping, no other containment

Exception – Double-Walled containment, trench to oil/water separator, safety bollards

SECONDARY CONTAINMENT

- Inside Storage – the impervious floors/wall may serve as containment
  - Not impervious if have major structural damage or opening between wall & floor

Plywood to Concrete, oil storage adjacent – Recommend sealant

Good - Concrete to Concrete

Good – concrete to concrete, building in a building

SECONDARY CONTAINMENT

- Inside Storage – the impervious floors/wall may serve as containment
  - Not for bulk storage tanks
  - Floor drains connected to stormwater
    - Possibility if floor drain is plugged or always covered
  - While interior floor drains connected to the sanitary sewer may work for MS4GP, it does NOT for SPCC unless connected to oil/water separator
    - Most POTWs are not capable of treating slugs of fuel or oil
    - Likely adhere to pumps and tanks and inhibit/bypass the treatment process
    - Most Ordinances do not allow for the discharge of fuels or oils to sanitary sewer system

SECONDARY CONTAINMENT

- Outside Storage – Sized to contain the largest capacity of the largest container with freeboard for precipitation
  - Remember to account for space taken up by other tanks or containers
  - Provide General containment (spill kit) for transfers and pipes
- Freeboard = 110% or 25-year, 24-hour storm event
- Implement requirements for drainage log
- No additional sized containment for double-walled tanks
- Under the SPCC Rule, containment is not required for containers <55 gallons

DISCHARGE POTENTIAL – PROVIDED FORM

- Sample template provides examples of failure modes

Could be leaks, overfill or complete tanks failure

Most likely – human error

Puncture?

Don't forget to include

containment method and containment capacity that is provided.

Table G-4 Containers with Potential for an Oil Discharge

	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 Co... Containers[b]					
2,500 gal off-roa...	Tank overfill, fitting leak, seam failure	10 – 2,500	South East	Concrete pad and earthen berm	6,732
2,500 gal on-road diesel tank	Tank overfill, fitting le... failure	...2,500	South East	Concrete pad and earthen berm	6,732
500 gal off-road diesel tank on trailer	Tank overfill or fitting...		Radial	Spill kit	Absorbs up to 25
115 gal on-road diesel tank on pickup truck	Tank overfill or fitting...		Radial	Spill kit	Absorbs up to 25
250 gal waste oil tote (inside shop)	Tank overfill	< 1	Radial	Spill containment pallet	300
55 gal hydraulic oil drum (inside shop)	Fitting leak	< 1	Radial	Spill containment pallet	66
500 gal gasoline UST	Tank overfill	2.5 – 15	South East	Double wall	> 500
Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)[c]					
None					
Piping, Valves, etc.					
Aboveground piping between diesel and gasoline tanks and dispensers	Fitting leak or failure	1	South East	Concrete pad and earthen berm	6,732
Buried piping between gasoline UST and dispenser	...or failure	1	Radial below ground	double wall buried piping	Double wall
Motor, hydraulic, lubrica... oil dispensing hoses	...or failure, hose failure	< 1	Radial	Spill kit	Absorbs up to 25
Product Transfer Areas (loca... where oil is loaded to or from a container, pipe or other piece of equipment.)					
Diesel and gasoline fuel tr...fer area	Receiving tank overfill, fitting leak or failure, fuel transfer hose failure	1 – 15	South East	Spill kit	Absorbs up to 25
Refueling areas at the personal vehicle gasoline dispenser and UST and in the field near equipment	Receiving container overfill, fitting leak or failure, fuel transfer hose failure	1 – 15	Radial or South East	Spill kit	Absorbs up to 25

INSPECTIONS & RECORDS

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

Inspect Monthly

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 inspect...	☒

See Attachment 3.2 also

TRAINING

- Conduct annual training – checklist, webinar, etc.

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: James Johnson /Production Manager	☒
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]**	☒

PROVIDED FORMS

- Training for oil-handling personnel to be completed annually

ATTACHMENT 3.4 – Oil-handling Personnel Training and Briefing Log

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

SECURITY

- Prevent unauthorized access to fuel pumps; provide lighting to identify a spill

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 residence in the farm's main area is about 200 yards away with a full view of the fuel storage and transfer area. If there was a spill, we would be close by to smell the fuel.
2) Tank fill pipes are capped and locked when not in use; these tanks do not have drain valves.
3) Fuel dispensers and their pump control switches are locked when not in use.
4) The drums and totes are located in the shop, which is locked when not in use.
5) Motion-activated lights are mounted above the entrance to the shop and at the fuel storage and transfer area next to the tank berm. We can see the lights from the house and when they come on, we check to see if there are trespassers or problems with the equipment.
6) Fuel nurse tank and the pick-up truck with tank are parked in a shed, which is locked when they are not in use.

EMERGENCY PROCEDURES

- Likely already have in a SWPPP

If not -> Look at IDEM's Emergency Response Quick Reference Sheet

5. Emergency Procedures and Notifications (§

Table G-7 Description of E[illegible]tions
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 fuel transfer operation.
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 spill kit is in the area opposite the fuel dispensers at the fuel storage and transfer area.
b. A spill kit is in the shop.
c. Each shed has a spill kit.
d. A spill kit is in the nurse tank truck cab and on the nurse tank trailer.
4) Contact regulatory authorities and other response personnel and organizations (see subsection 6).

CONTACT LIST

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) WP Company (Waste Oil Disposal Contractor)	 870-555-8000
Key Facility Personnel	
Designated Person Accountable for Discharge Prevention: James Johnson, Production Manager	Office: 870-555-1651
	Emergency: 123-456-7890 (cell phone)
	Office:
	Emergency:
	Office:
	Emergency:
	Office:
	Emergency:
State Oil Pollution Control Agencies Department of Emergency Management (ADEM), AR Department of Environmental Quality (ADEQ)	1-800-322-4012

Also included are numbers for hospital, downstream users/property owners

NATIONAL RESPONSE CENTER

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.	

SPILL REPORTING REQUIREMENTS

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 (Region VI)

(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

After a spill – do you still meet the requirements for a Qualified Facility?

PROVIDED FORMS

- Spill Report 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			

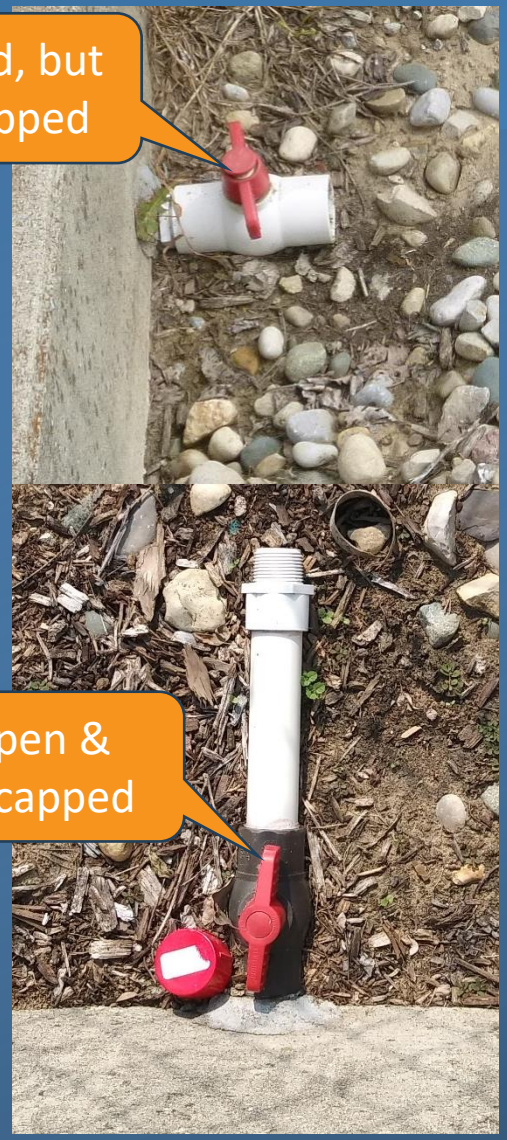
GENERAL REQUIREMENTS

- Drainage valve open for tank containments = NO secondary containment
- Inspect monthly

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 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]**	☒	☐



PROVIDED FORMS

- Visually assess accumulated precipitation for a sheen before releasing

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
	☐	☐	☐	☐		
	☐	☐	☐	☐		

GENERAL REQUIREMENTS

- Provided attachments will help you through this

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 deterior or accumulation of oil inside diked areas. **[See Inspection Log and Schedule in A** *[§§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)]*	☐	☒

Home-made

PROVIDED ATTACHMENTS

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)): 250-gal. motor oil and waste oil totes: 55-gal steel hydraulic and lubrication oil drums Trailer-mounted Fuel nurse tank Pickup truck fuel nurse tank	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside containment pallets
55 to 1,100 gallons with sized secondary containment: 500-gal. gasoline tank #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]: 2,500-gal. off-road diesel tank #1 2,500-gal, on-road diesel tank #2	
1,101 to 5,000 gallons with sized secondary containment and no method of leak detection[a]: 1,200-gal, slop oil tank #4	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

GENERAL REQUIREMENTS

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 fuel delivery procedures: 1) Gauge AST and check the level gauge to prevent tank overfill. 2) Set parking brake and use chock blocks to prevent movement; inspect fittings and fueling damage. 3) Place drip pans under valve-hose fitting connections. 4) Monitor the liquid level in the receiving tank during transfer to prevent tank overfill. 5) If an oil spill occurs, the spill kit will be used to contain the spill. Main spill kit is located opposite the fuel dispensers at the fuel storage and transfer area. Dispenser and mobile refueler fueling procedures: 1) Before filling motorized equipment, shutoff all engines and set parking brakes; do not leave filling operation unattended. 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. 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.	☒	☐
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)]*	☒	☐

MOST IMPORTANTLY – Be present and pay attention during transfers

PROVIDED FORMS

- If aboveground tanks are leased from a company, ask what type of inspections and/or maintenance they conduct on the tanks

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]
	Aboveground pipes	Visual inspections			☐
	Buried pipes	Monthly interstitial monitoring and leak testing at time of installation, modification, construction, relocation, or replacement			☐
	ASTs 2,500-gal. off-road diesel tank #1 55-gal steel hydraulic, lubrication, and adjuvant oil drums Trailer-mounted Fuel nurse tank Pickup truck fuel nurse tank	Visual inspections (STI SP001, Standard for the Inspection of Aboveground Storage Tanks)			☐

FINAL THOUGHTS…

- If you are required to have an SPCC Plan, you do not have to develop a SWPPP under the MS4GP per IDEM
- Use common sense when selecting secondary containment
  - Poor housekeeping = containment pallet
  - Good housekeeping = location/building as containment

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