

YOUR SPCC PROGRAM: A CHECK UP

**Avoid Common Issues Seen
with SPCC Programs**

Amy M. Reed, P.E.

SAFETY MOMENT – PEDESTRIAN/RUNNER SAFETY

- ▶ Stay on the sidewalk where sidewalks are provided – it's the law!
- ▶ If you aren't on the sidewalk make sure to walk on the side of the road and face on-coming traffic
- ▶ Dress like a traffic cone, not a ninja!!



WHO NEEDS AN SPCC PLAN?

- ▶ An oil release from a facility can impact navigable waters or adjoining shorelines AND
- ▶ Aboveground oil storage in containers 55 gallons or larger and totals $\geq 1,320$ gallons and/or
- ▶ Underground oil storage $> 42,000$ gallons ONLY IF USTS not regulated by state program

ALL OILS ARE REGULATED EVEN THE EDIBLE ONES!

- ▶ Gasoline
- ▶ Diesel Fuel
- ▶ Jet Fuel
- ▶ Motor Oil
- ▶ Grease
- ▶ Asphalt
- ▶ Vegetable Oil
- ▶ Soybean Oil



MYSTERIOUS LIQUIDS – IS IT AN OIL?

- ▶ Use SDS to determine if water soluble or will float on water



WHAT'S A NAVIGABLE WATER IN SPCC WORLD?

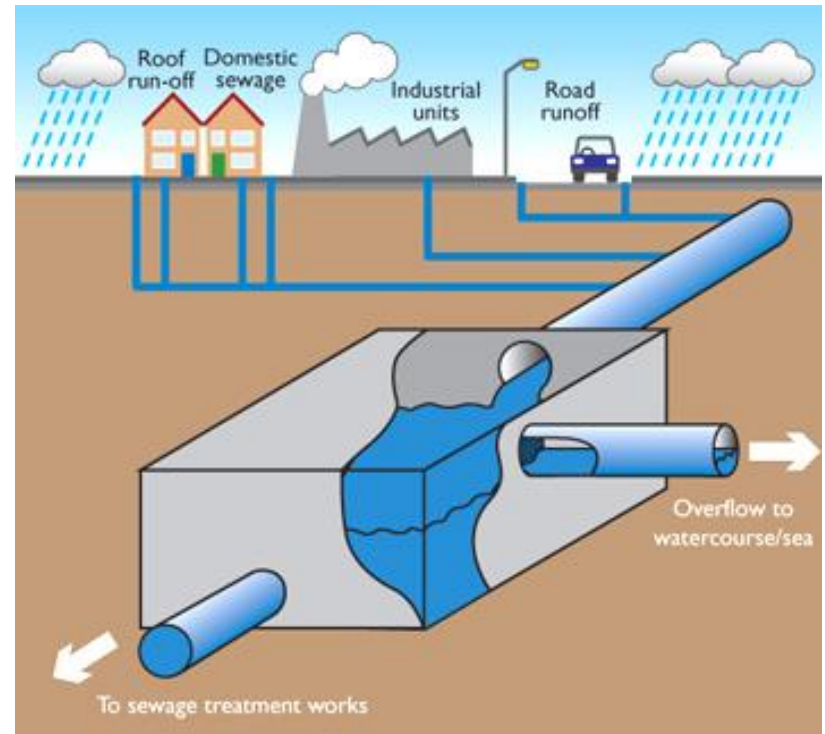
- ▶ Lakes
- ▶ Rivers
- ▶ Streams
- ▶ Oceans
- ▶ Combined Sewer Systems
- ▶ Drainage Ditches
- ▶ Wetlands
- ▶ Intermittent Streams



Throw out row row
row your boat!
Combined sewers,
intermittent
streams, and
drainage ditches
count!

COMBINED SEWERS, REALLY?

- ▶ Combined sewers typically discharge to the POTW
- ▶ During periods of high rainfall, combined sewers may discharge to stream or river
- ▶ Because a release to a combined sewer could potentially impact a navigable water, combined sewers are considered navigable waters



DO I REALLY NEED AN SPCC PLAN?

- ▶ Do you have the aboveground or underground oil capacity?
- ▶ Remove all manmade structures from the equation
- ▶ Will a release get to navigable waters?
- ▶ In most scenarios, the answer is YES!
- ▶ If no, document your reasoning and maintain in your environmental files



SPCC Program Elements

**Description of Oil
Storage/Usage**

Personnel Training

Site Plan

SPCC Inspections

Secondary Containment

**Tank Integrity
Testing**

**Internal/External Spill
Notification**

Fail-Safe Devices

Spill response procedures

**What can we
do better?**

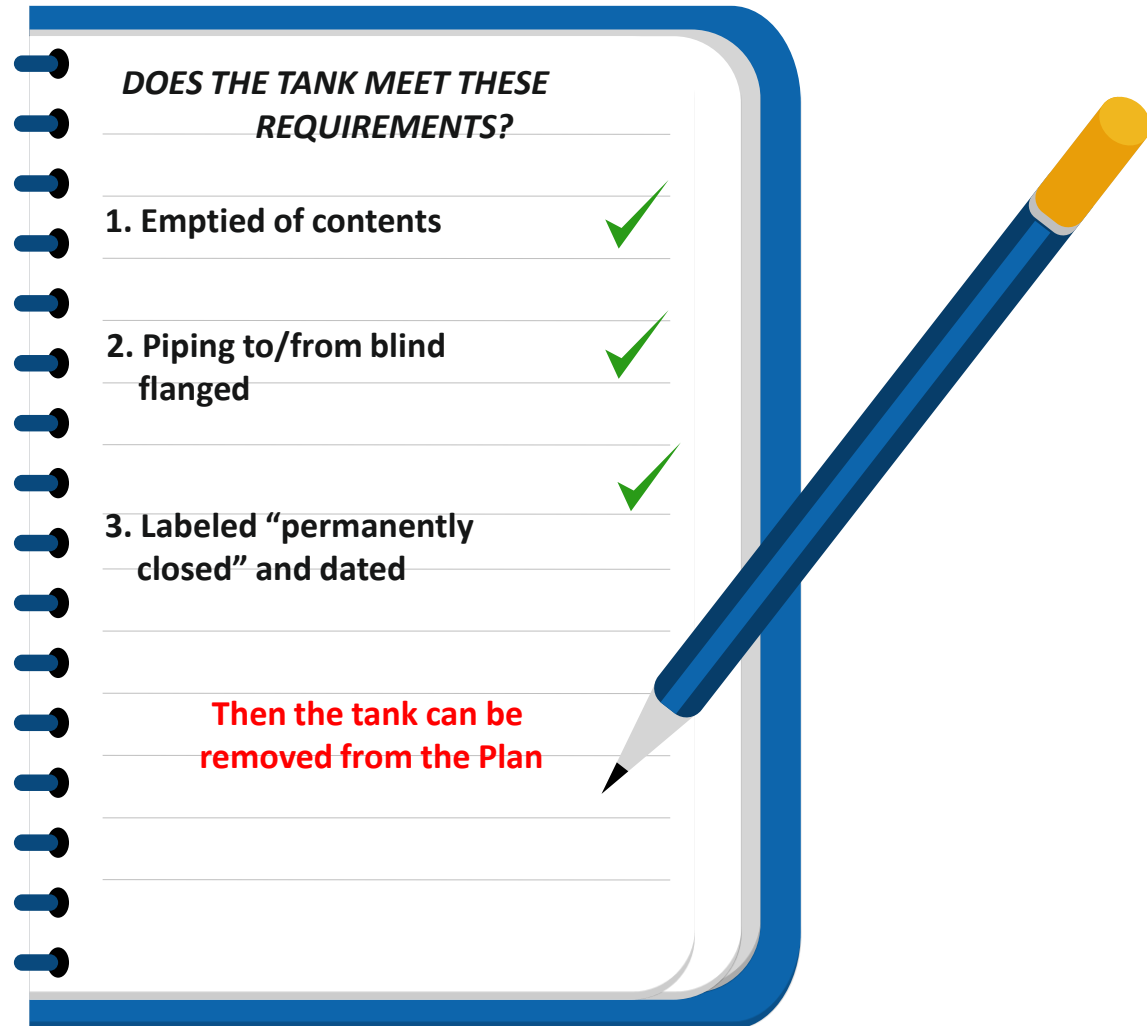
REGULATED CONTAINERS

- ▶ Storage tanks, totes, and drums
- ▶ Oil-Filled Equipment (Transformers, Hydraulic Reservoirs)
- ▶ Oil-Filled Manufacturing Equipment



**Remember to
include hydraulic
reservoirs on
elevators and batch
mixing equipment**

PERMANENTLY CLOSED CONTAINERS



DOES THE TANK MEET THESE REQUIREMENTS?

1. Emptied of contents ✓
2. Piping to/from blind flanged ✓
3. Labeled “permanently closed” and dated ✓

Then the tank can be removed from the Plan

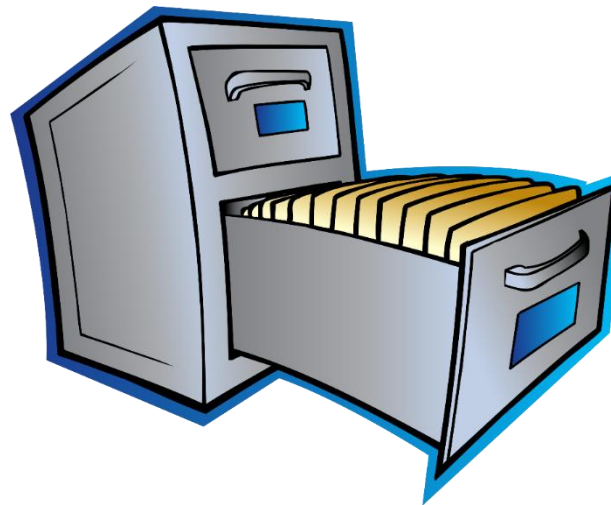
ANNUAL TRAINING REQUIREMENT

- ▶ Instruction in operation and maintenance of spill prevention equipment
- ▶ Instruction of pollution control laws, rules and regulations
- ▶ DOCUMENT the training



IMPROVEMENTS TO INSPECTION PROGRAMS

- ▶ Document inspections on a detailed inspection form
- ▶ Document where corrective action is required
- ▶ Use inspection to capture issues with containment



COMMON CONTAINMENT ISSUES

- ▶ Cracks in containment walls
- ▶ Corrosion in steel containment
- ▶ Critter holes
- ▶ Vegetation





CRACKED CONTAINMENT



VEGETATION IN CONTAINMENT – EXAMPLE 1



VEGETATION IN CONTAINMENT – EXAMPLE 2



FRAYED LINERS



IMPROPER USE OF SPILL CONTAINMENT PALLET



SPILLS IN DRUM CONTAINMENT

STORM WATER IN CONTAINMENT AREAS

- ▶ Tank Corrosion
- ▶ Containment Corrosion
- ▶ Close valves after draining
- ▶ Inspect for sheen prior to discharging and document



CONTAINMENT FULL OF STORM WATER

TANK INTEGRITY TESTING

- ▶ API 653: Field-Erected Tanks
- ▶ 2002 EPA Memorandum on Shop-Fabricated Tanks is Outdated
- ▶ Steel Tank Institute (STI) SP001: Shop-Fabricated Tanks issued in 2011
- ▶ STI-SP001: Tank <5,000 gallons with containment requires monthly and annual inspections
- ▶ STI-SP001: Tank >5,000 gallons or tanks without secondary containment require additional integrity testing and leak testing by a certified inspector at intervals specified by STI

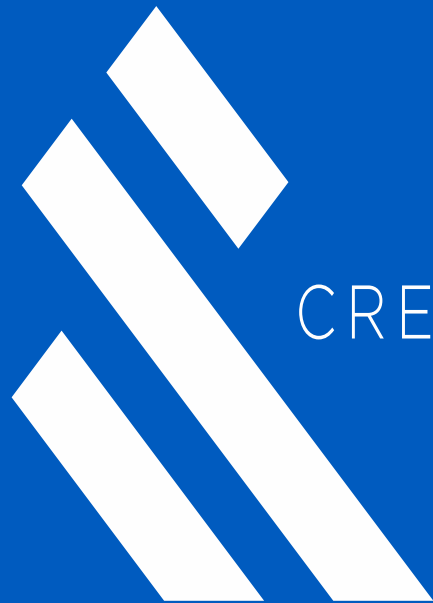
RECORDKEEPING

- ▶ Three Years: Training, Inspection Forms, Storm Water Inspections
- ▶ Life of the Tank: Tank Integrity Testing

QUESTIONS – CONTACT ME!

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CREATE AMAZING.