

Track One Speed Learning:

Ramifications of Triggering “Substantial Harm” Within the SPCC Plan

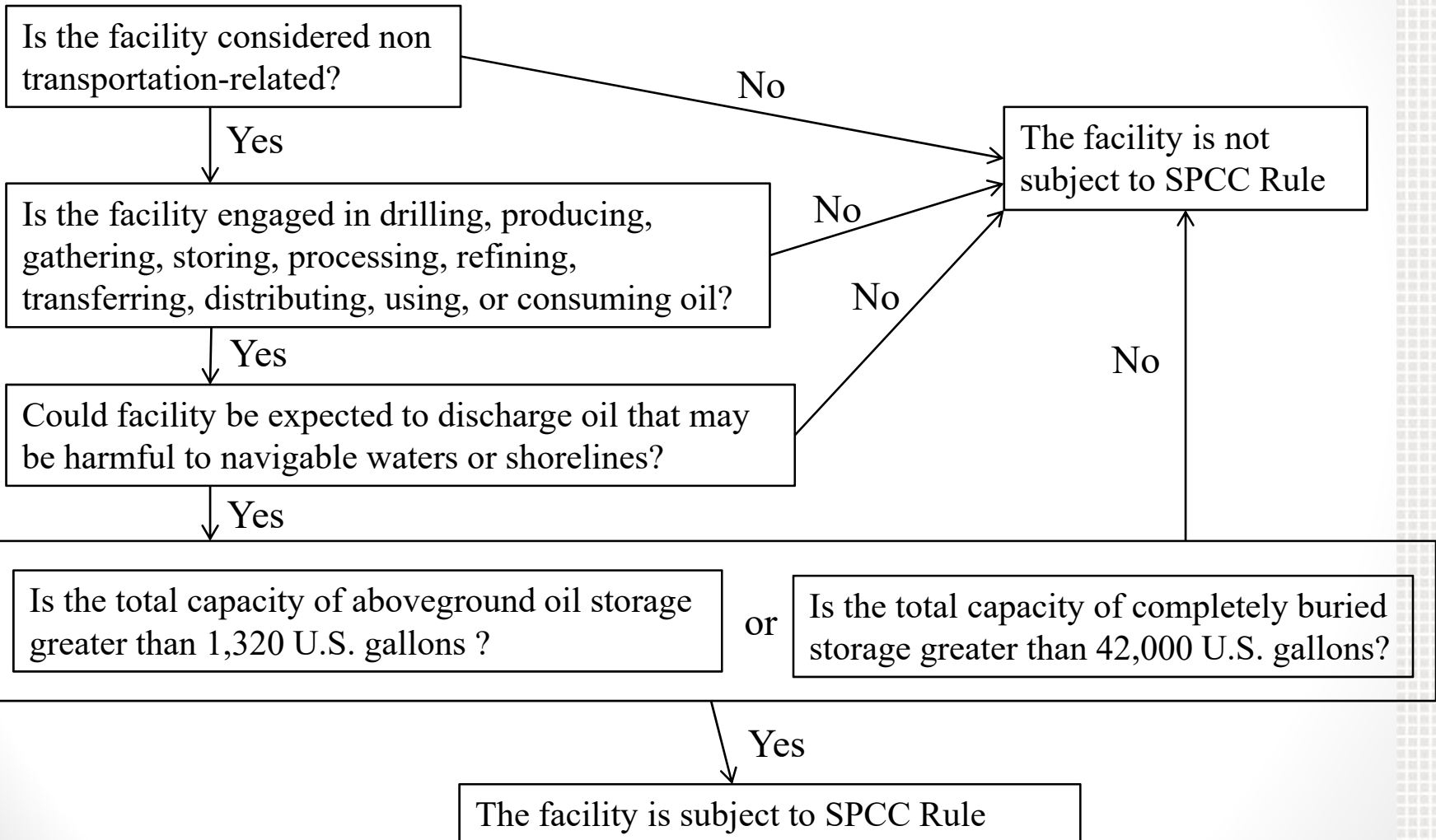
Rohn Hamilton, P.E.
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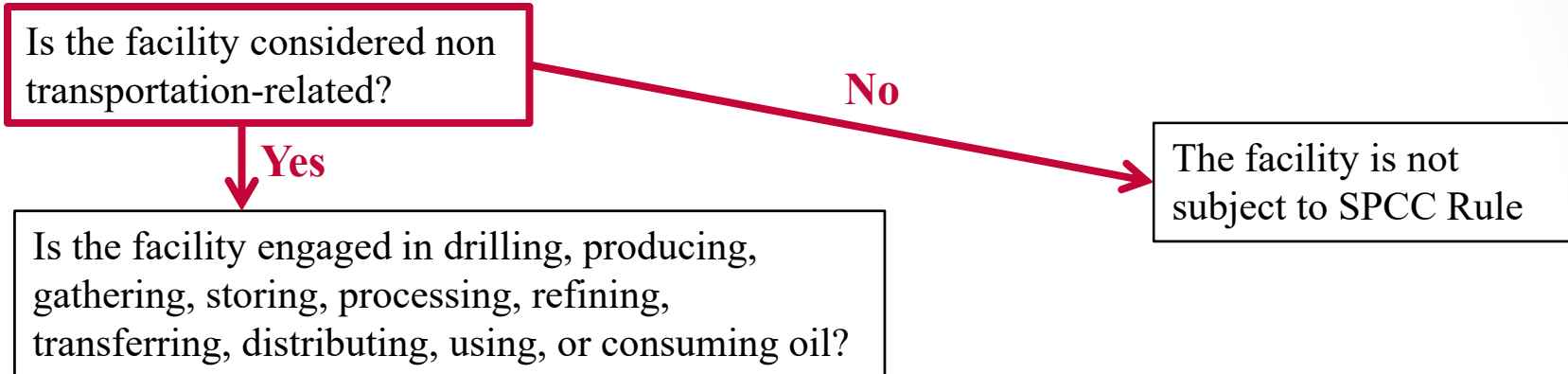
Ramifications of Triggering “Substantial Harm” within the SPCC Plan

- When to Accomplish an SPCC (Spill Prevention Control and Countermeasure) Plan
- Certification of the Applicability of the Substantial Harm Criteria, Attachment II
- What Criteria Triggers “Substantial Harm”?
- Substantial Harm Criteria Triggered — What is a Facility Response Plan (FRP)?

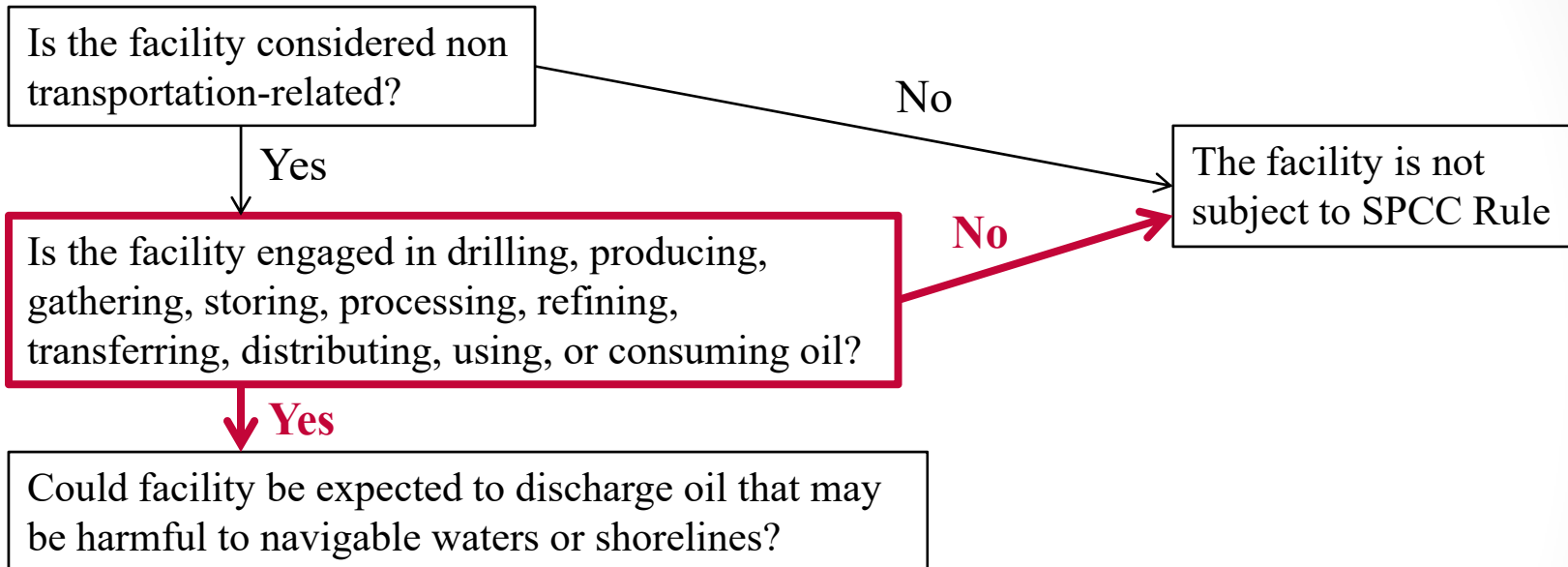
When to Accomplish an SPCC Plan



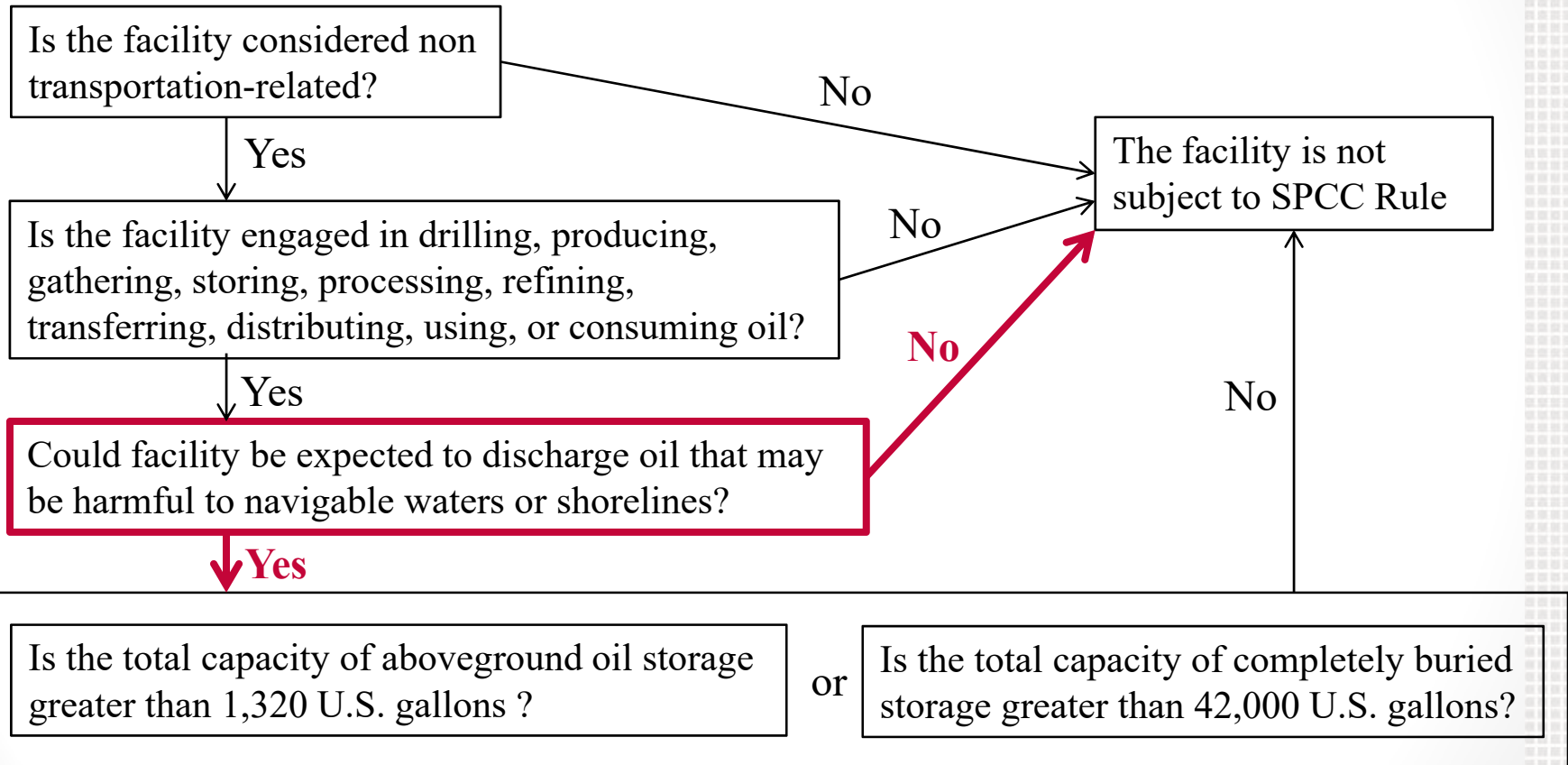
When to Accomplish an SPCC Plan



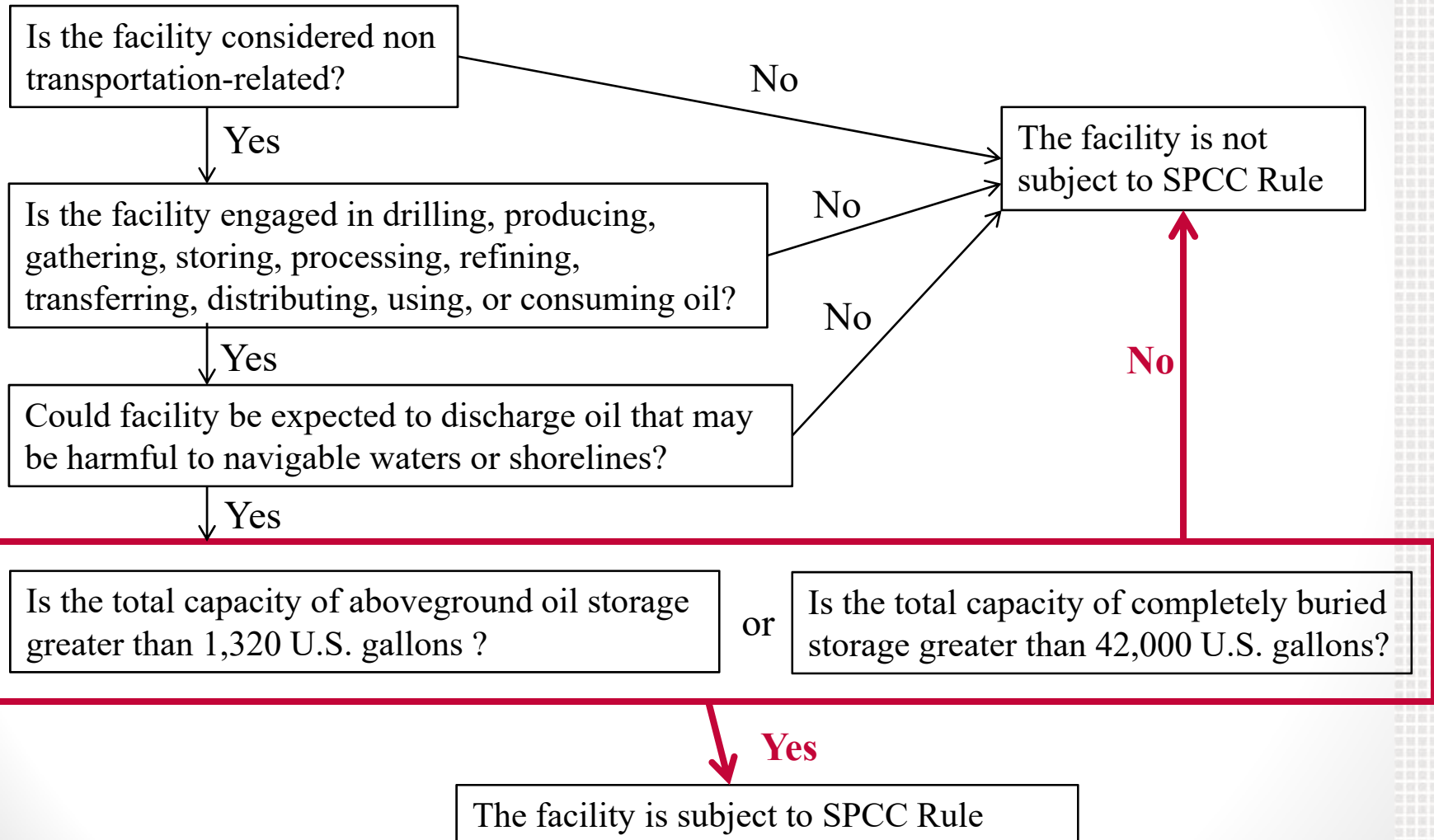
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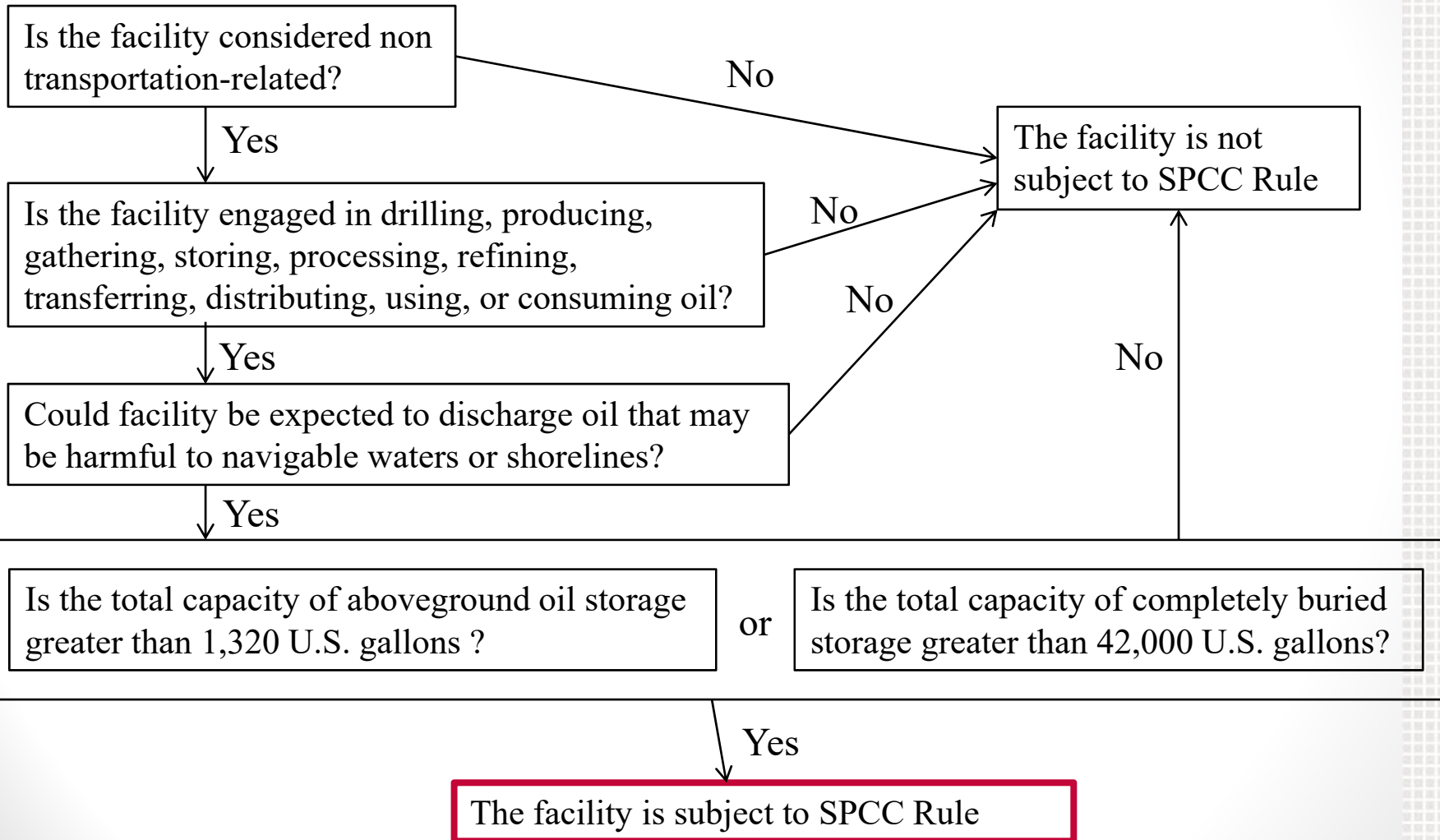
When to Accomplish an SPCC Plan



When to Accomplish an SPCC Plan



When to Accomplish an SPCC Plan



Certification of the Applicability of the Substantial Harm Criteria Facility, Attachment II

Does the facility have an oil storage capacity that is greater than or equal to 42,000 gallons and conduct operations that include over-water transfers to or from vessels?

Yes

No—proceed to questions below

2. Does the facility have an oil storage capacity greater than or equal to one million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation with any aboveground storage area?

Yes

No—proceed to next question

3. Does the facility have an oil storage capacity greater than or equal to one million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C–III to this appendix or a comparable formula 1) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA’s “Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments” (see Appendix E to this part, section 13, for availability) and the applicable Area Contingency Plan.

Yes

No—proceed to next question

4. Does the facility have an oil storage capacity greater than or equal to one million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula 1) such that a discharge from the facility would shut down a public drinking water intake?

Yes

No—proceed to next question

5. Does the facility have an oil storage capacity greater than or equal to one million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes

No—proceed to next question

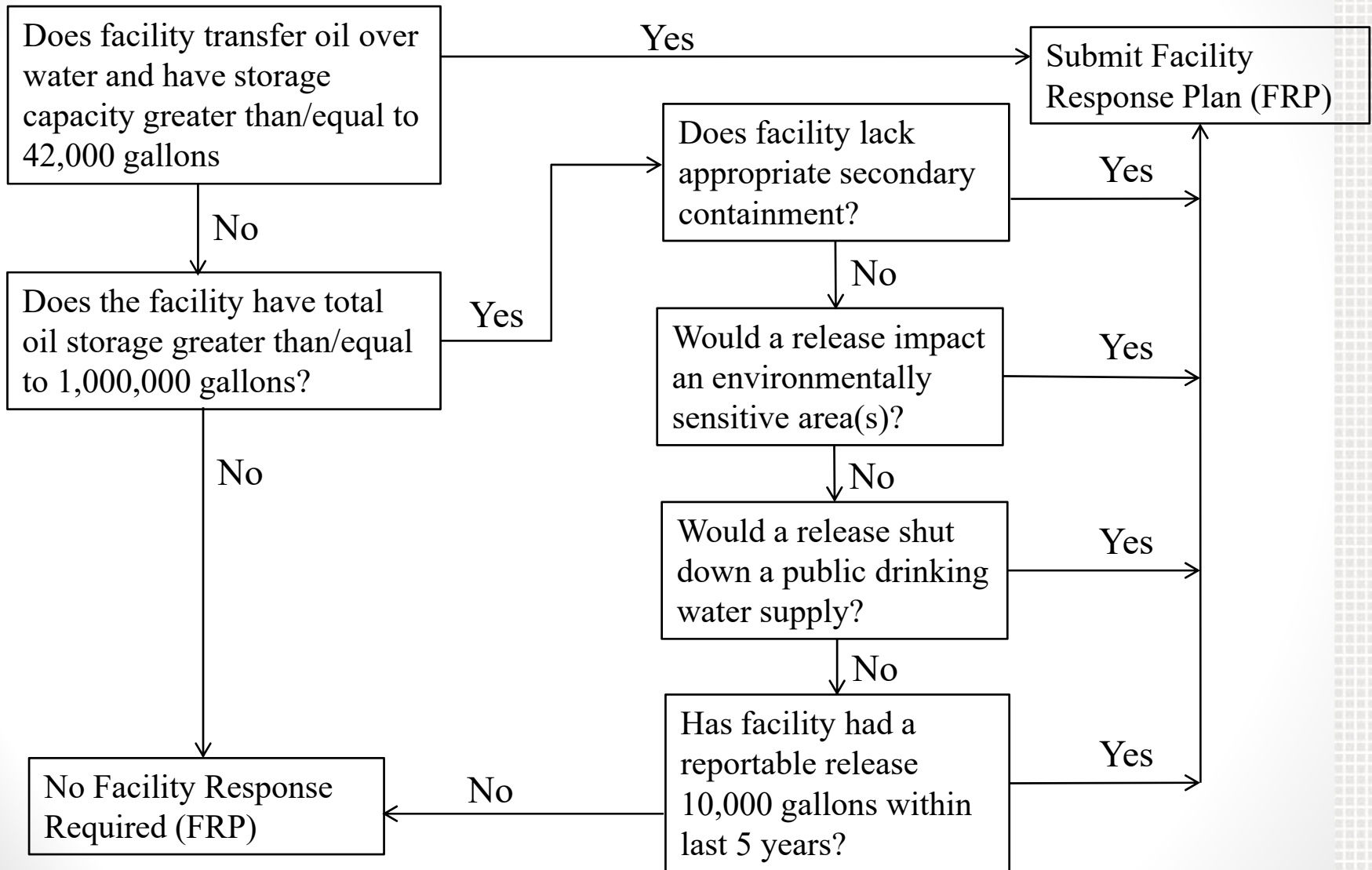
Certification I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature _____

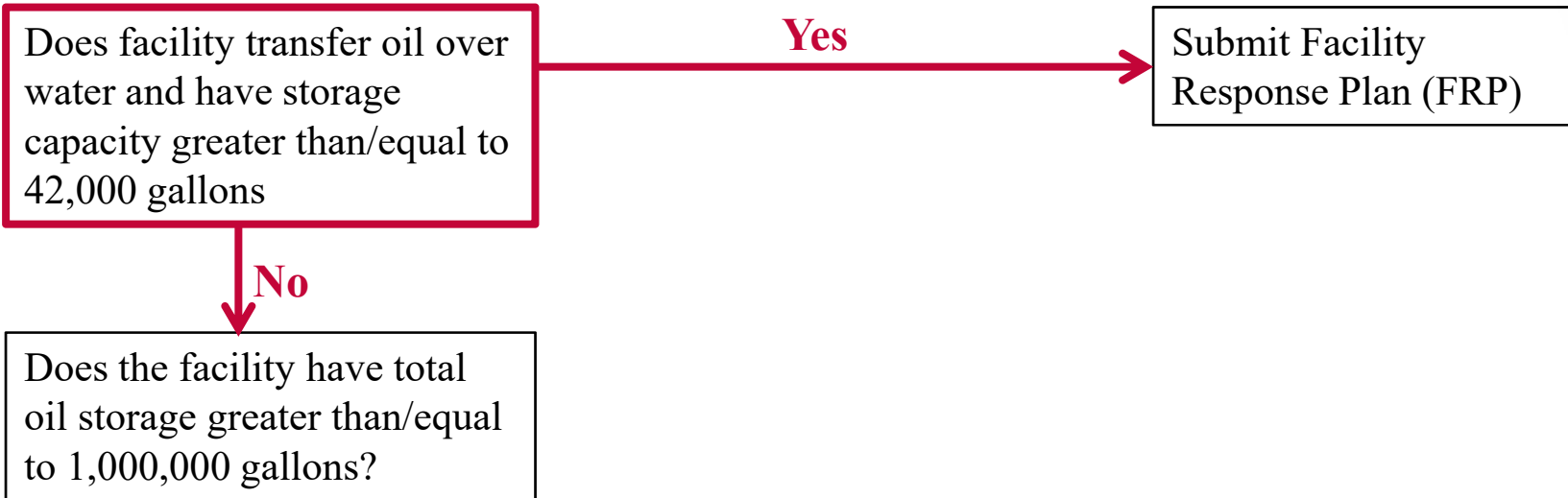
Name (please type or print) _____

Date _____

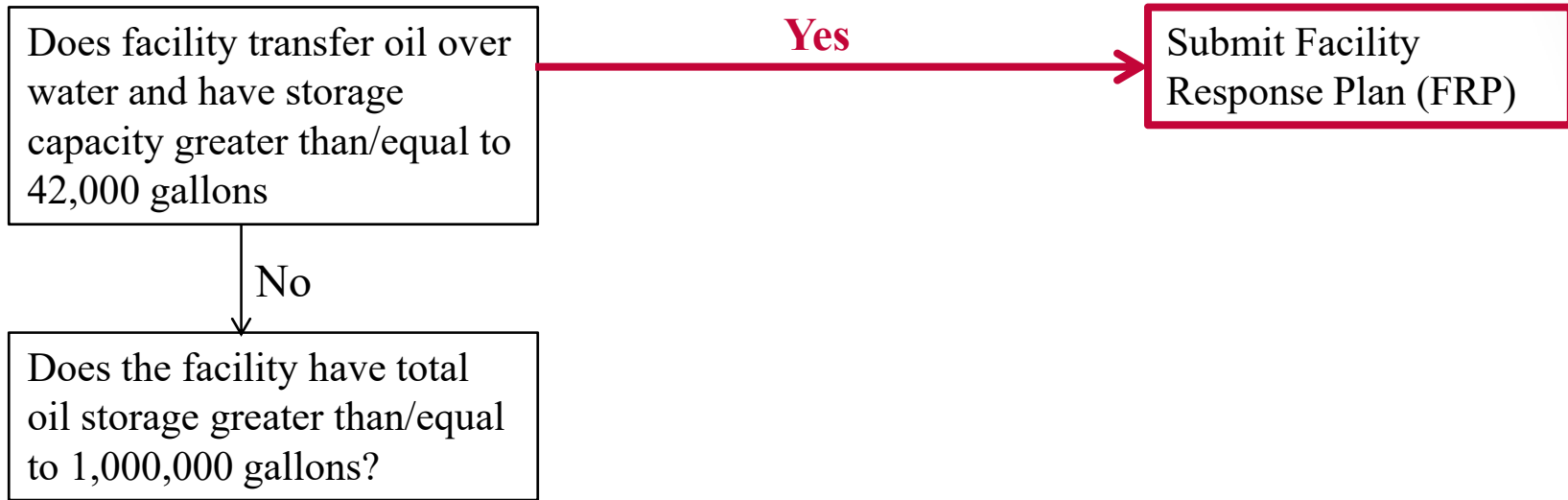
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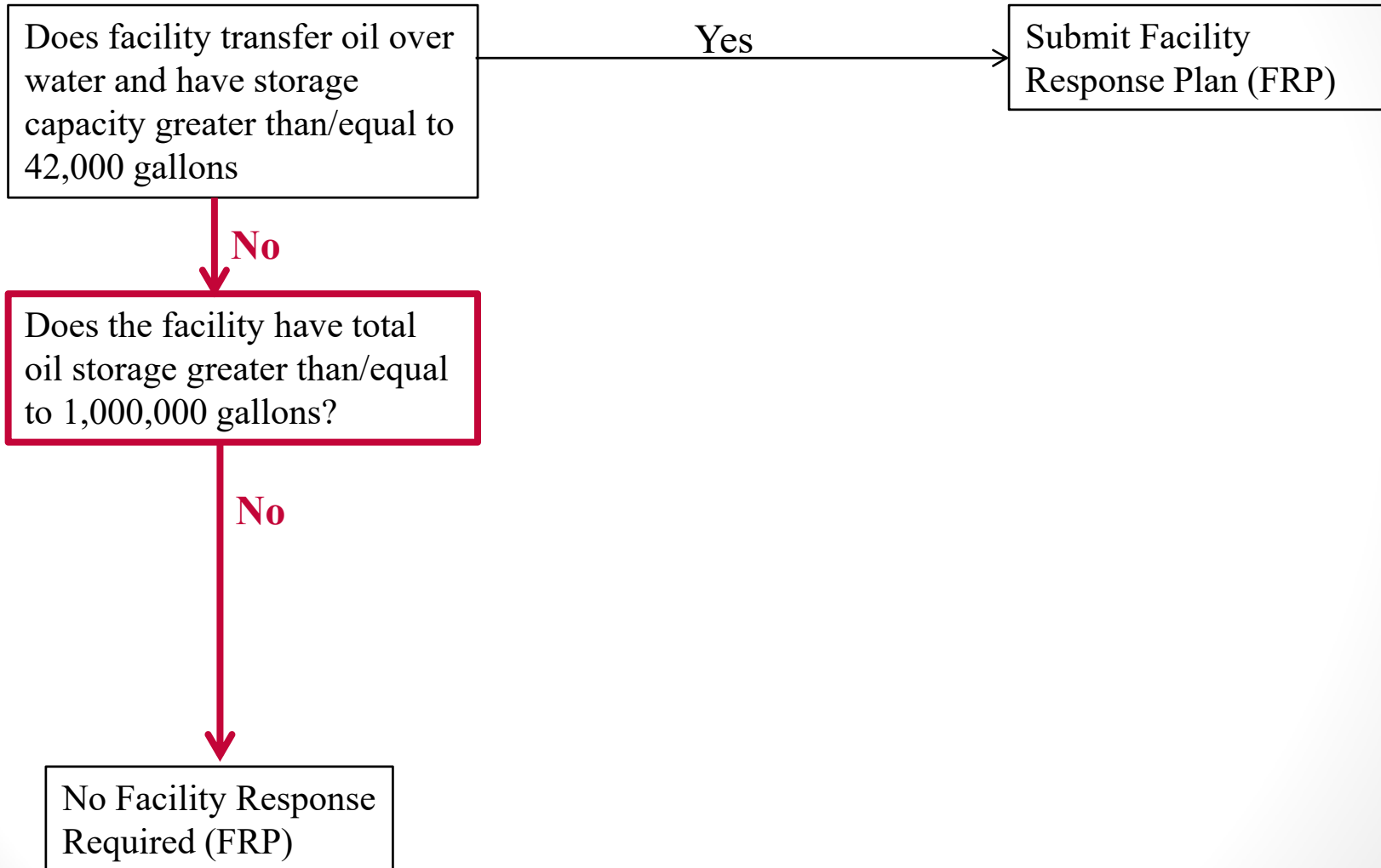
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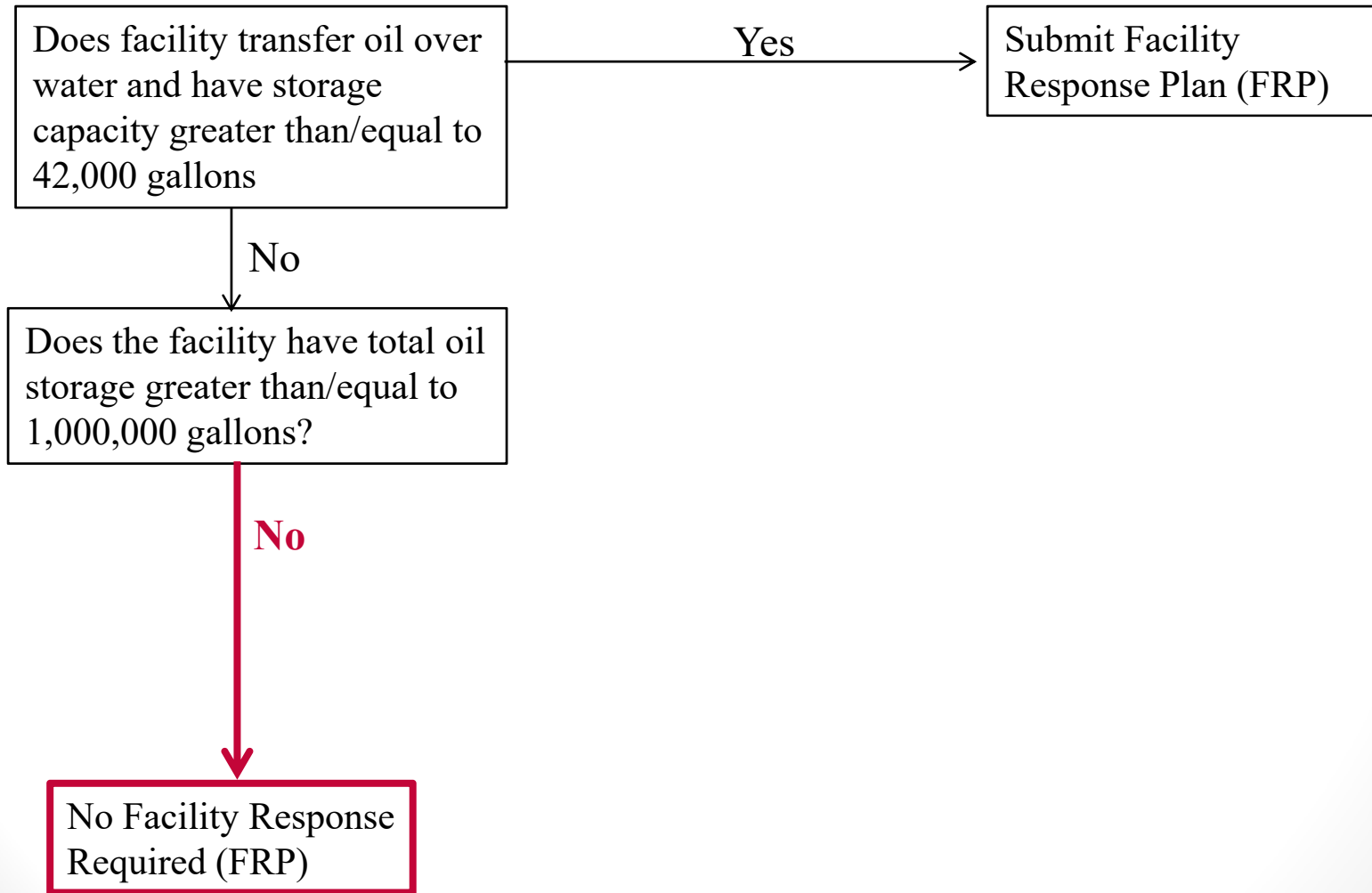
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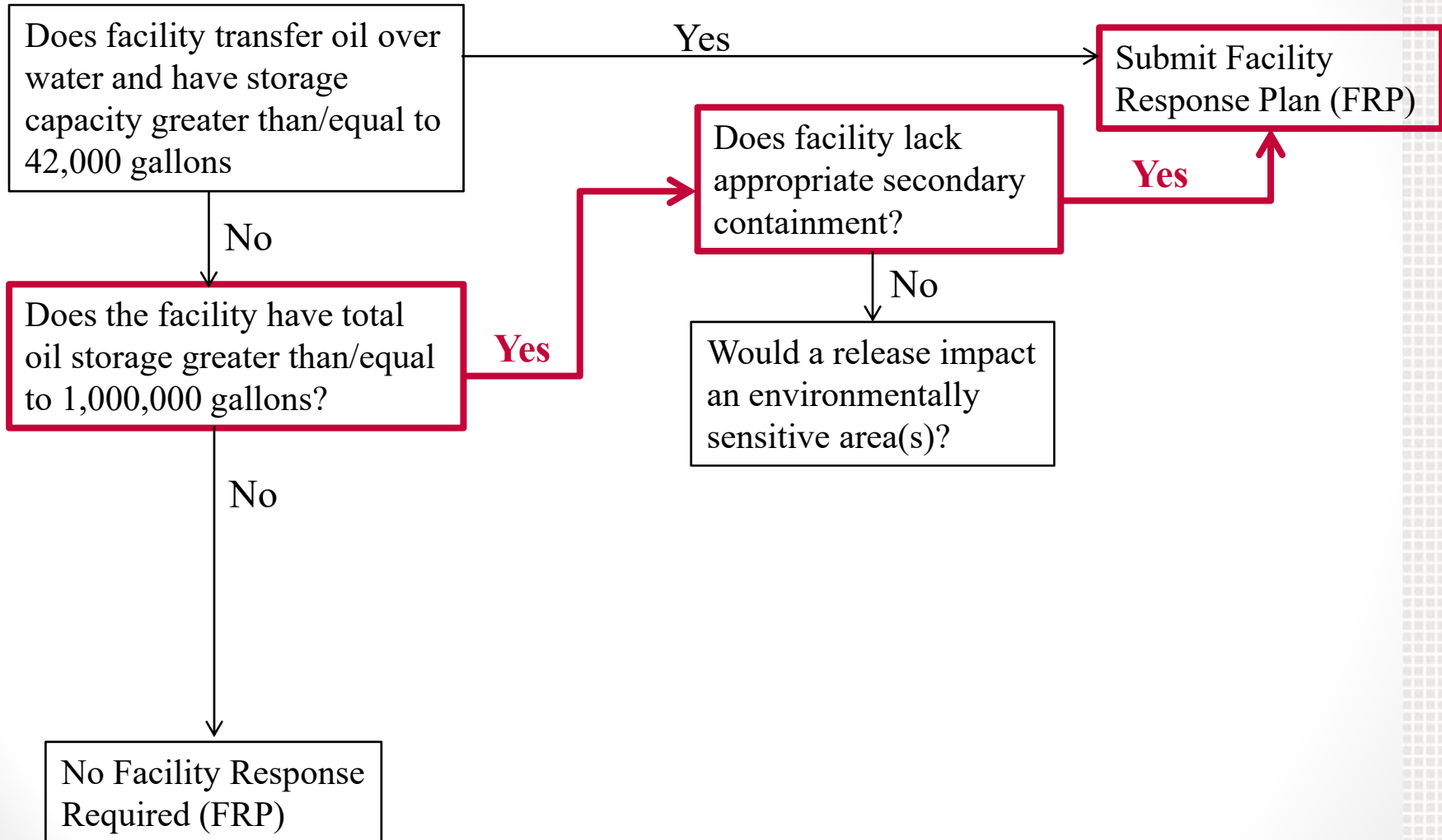
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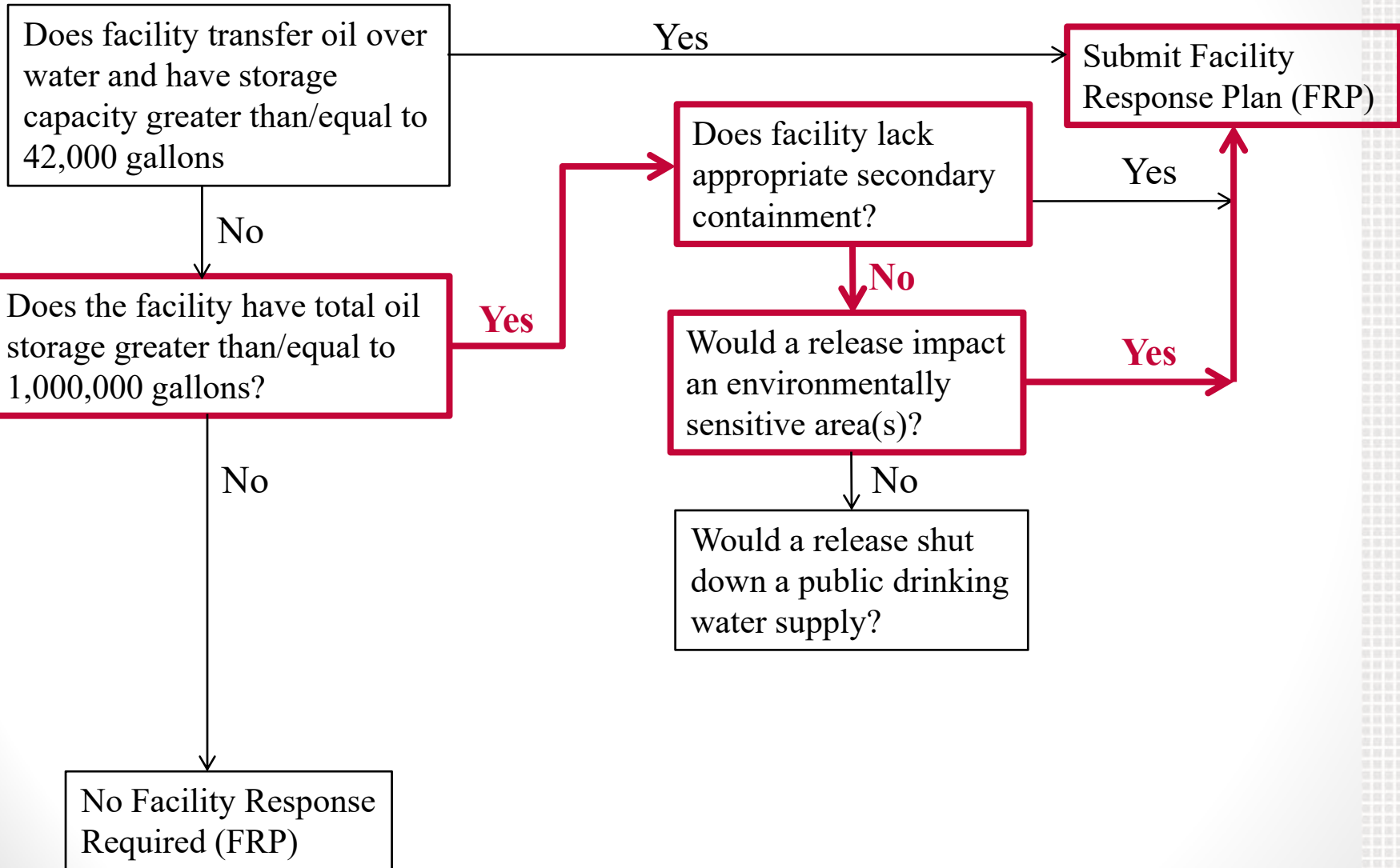
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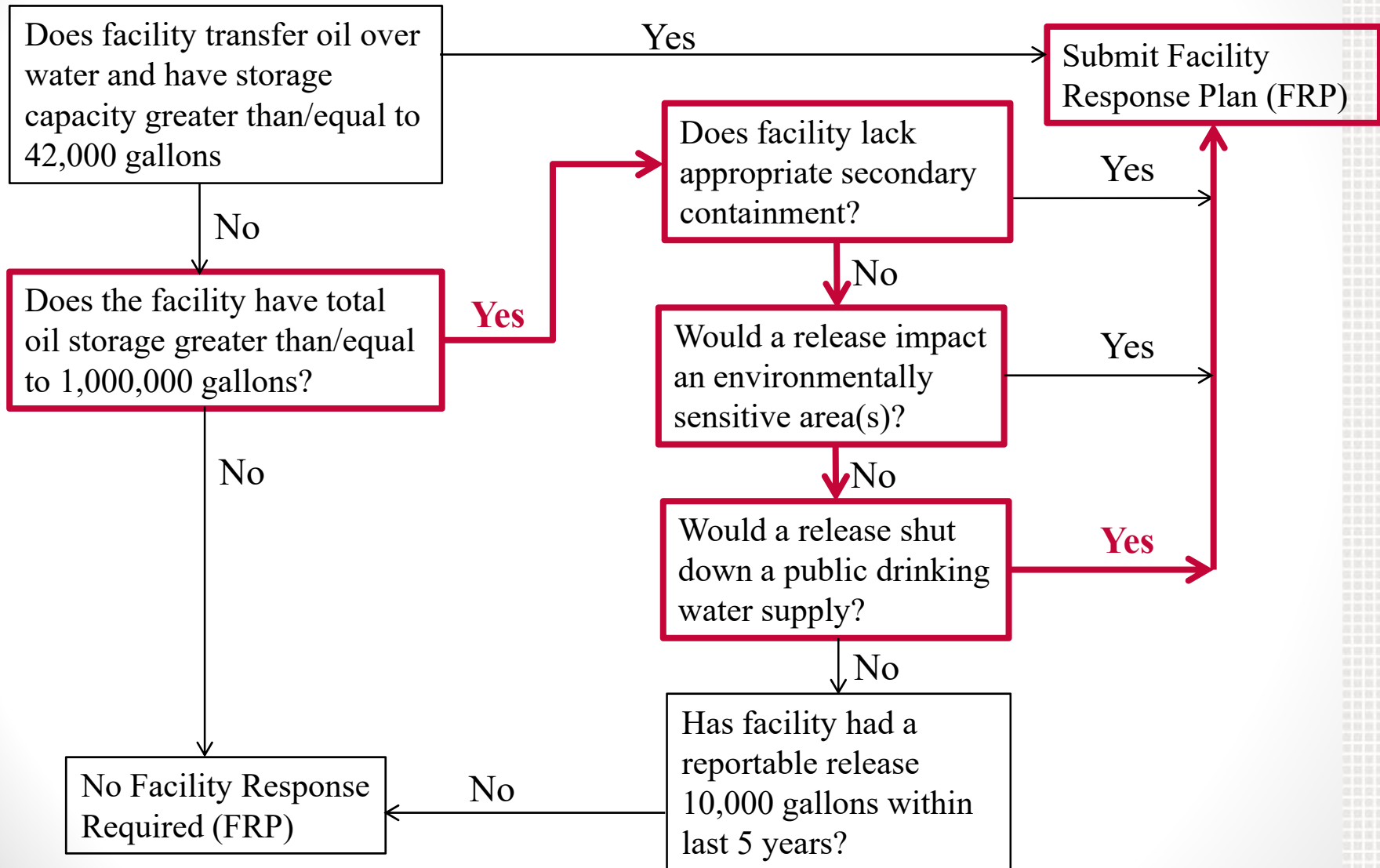
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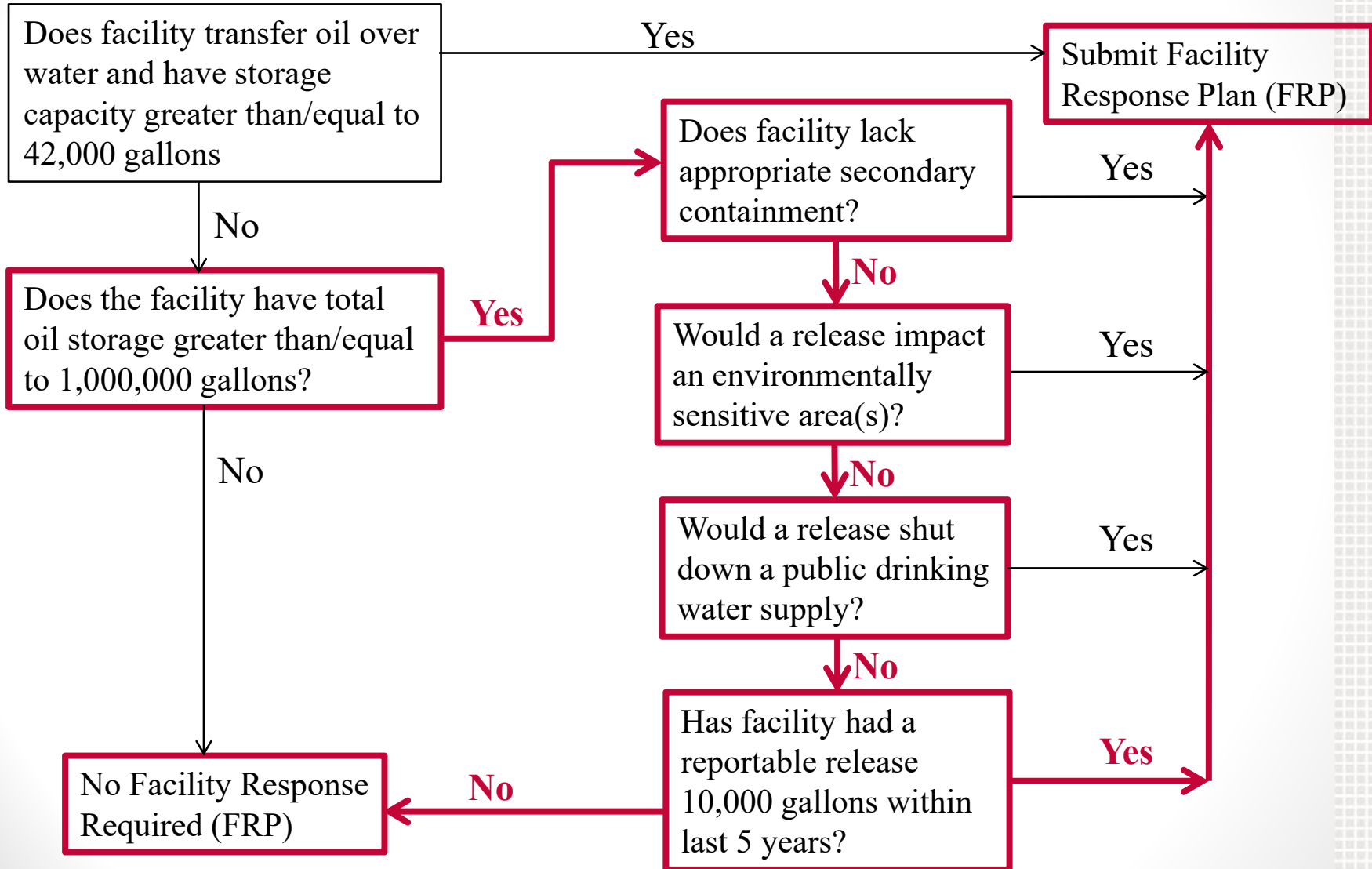
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Yes

No—proceed to next question

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Substantial Harm Criteria Triggered – What is a Facility Response Plan (FRP)?

- SPCC plan does what?
 - The SPCC plan is the basis of EPA's oil spill prevention program.
 - First layer of defense for an oil discharge — it addresses the control and countermeasures to contain an oil discharges.
- FRP does what?
 - The FRP is designed to ensure the certain facilities have adequate oil spill response capabilities.
 - The FRP is a plan for responding, to the maximum extent practicable, to the worse case discharge and specific substantial threats (fish and wildlife, public water source, etc.).
 - Response resources are available in a timely manner
 - Helps owner/operator improve discharge prevention measures
 - Aid local and regional response authorities to better understand hazards and response capabilities

Substantial Harm Criteria Triggered – What is a Facility Response Plan (FRP)?

- Key Elements of the Facility Response Plan
 - (Regulatory outline located 40 CFR 112 Appendix F)
 - Emergency Response Action Plan (ERAP)
 - Facility name, type, location, owner, and operator information
 - Emergency notification, equipment, personnel, evidence that equipment and personnel are available
 - Identification and evaluation of potential discharge hazards and previous discharges
 - Identification of small, medium, and worst case discharges scenarios and response actions
 - Description of discharge detection procedures and equipment
 - Detailed implementation plans for containment and disposal
 - Facility and response self-inspection; training, exercises, and drills, and meeting logs
 - Diagrams of facility and surrounding layout, topography, evacuation paths, and drainage flow paths
 - Security measures, including fences, lighting alarms, guards, emergency cutoff valves, and locks
 - Response Plan cover sheet (form with basic information concerning the facility)

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Questions?

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