

SPCC Plan Requirements, Deficiencies and Updates: (40 CFR Part 112)

The SPCC rule applies to facilities that: Are non-transportation-related; Have an aboveground oil storage capacity of more than 1,320 U.S. gallons or a completely buried oil storage capacity greater than 42,000 U.S.; and Could reasonably be expected to discharge oil to navigable waters or adjoining shorelines in quantities that may be harmful. The information listed below is to help you jog your memory of the SPCC plan requirements. Please review the regulation for more detail on the items that applies to your site.

Basic requirements of an SPCC Plan. (40 CFR, 112):

- Description of any spills in the last twelve months
- Layout of facility, including diagrams marking location(s)
- Predictions of the direction, rate of flow, and total quantity of oil that could be discharged
- A complete explanation of spill containment
- Facility maintenance of containment area drainage
- Bulk storage practices
- Transfer protocol
- Tank truck loading and unloading practices
- Inspection and documentation
- Site security
- SPCC training programs
- A "Certification of the Applicability of Substantial Harm Criteria" form.

Common SPCC Plan Deficiencies:

- Inaccurate facility diagrams & descriptions
- Missing state or local requirements
- Improper process for brittle fracture
- No monitoring of heating coils
- Improper Recording of Prior Spills
- No description as to the impact of a potential release

When should you update your SPCC Plan?

- Moved tanks around
- Changed the capacity of your tanks
- Changed the contents of your tank
- Removed a tank from your facility
- Added a tank to your facility
- Replaced a tank with a new or different tank
- Changed the site layout
- Company or organization changed
- The personnel at your facility changed
- Every 5 years
- Don't forget the 55-gallon drums

Throughout the years I have seen many written plans in the general industry. Far too often the plans are written and set on a shelf to never be looked at again. This can cause problems down the line when you have an inspection and the inspector asks to review your plan. Also, this plan will be scrutinized after a serious release occurs at the facility. Make a note to review all the written plans at your facility every year. Go through the plan and update all required information. Read the requirements of the plan and what requires updating in that plan. Do not give a regulator more ammunition for a hefty non-compliance fine.