# SPCC 40 CFR Part 112 Tier I Template Instructions (for farms)



#### **Insert Instructor Names**

**Insert HQ Office/Region** 

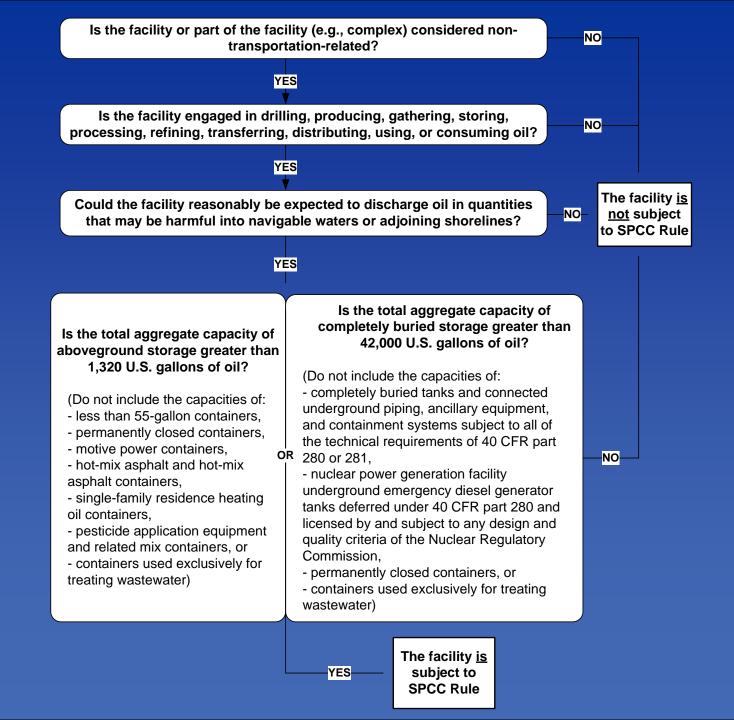
**Insert Date** 

### Today's Agenda

- I. SPCC/Qualified Facility Applicability
- II. Tier I Qualified Facility SPCC Plan Template
- III. Questions and Answers

# Part I: **SPCC/ Qualified Facility Applicability**





### 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:		
Within three years prior to the Plan certification date, or since becoming subject to the SPCC rule if in operation for less than three years, the	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.		
<ul> <li>A single discharge of oil to navigable waters or adjoining shorelines exceeding 1,000 gallons, or</li> <li>Two discharges of oil to navigable waters or adjoining shorelines each exceeding 42 gallons within any 12-month period.<sup>1</sup></li> </ul>	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.		

<sup>1</sup>Not including discharges that are the result of natural disasters, acts of war, or terrorism. When determining the applicability of this SPCC reporting requirement, the gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. EPA considers the entire volume of the discharge to be oil for the purposes of these reporting requirements.

### **Examples of Oil**

- Gasoline
- Off-road and on-road diesel fuel
- Hydraulic oil
- Lubrication oil
- Crop oil
- Vegetable oils from crops
- Adjuvant oil
- Milk\*



<sup>\*</sup> Milk and Milk product containers are now exempt from the SPCC capacity calculations and rule requirements

# What is a "Reasonable Expectation of an Oil Discharge"?

- Initial determination by the owner/operator based on geographical and location aspects of the farm
- You may consider proximity to water, land contour, drainage
- Exclude manmade features, such as secondary containment dikes around tanks and impoundments, in determination
- Good idea to document determination
  - Particularly if you conclude you are not subject to the rule
  - Not a rule requirement
- See Section 2.4 of SPCC guidance document http://www.epa.gov/emergencies/docs/oil/spcc/guidance/2\_ Applicability.pdf

# Part II: Tier I Qualified Facility SPCC Plan Template



# Doe's Family Farm (fictional scenario)

- Doe's Family Farm is comprised of multiple parcels of land totaling approximately 2,800 acres on which rice, corn and soybeans are grown on a rotational basis.
- The farm is adjacent to an unnamed tributary of the White River.
- The main operational area of the farm includes sheds to store equipment, a tractor repair and maintenance shop, fuel storage and transfer area, silos for storing corn, and a single-family residence.

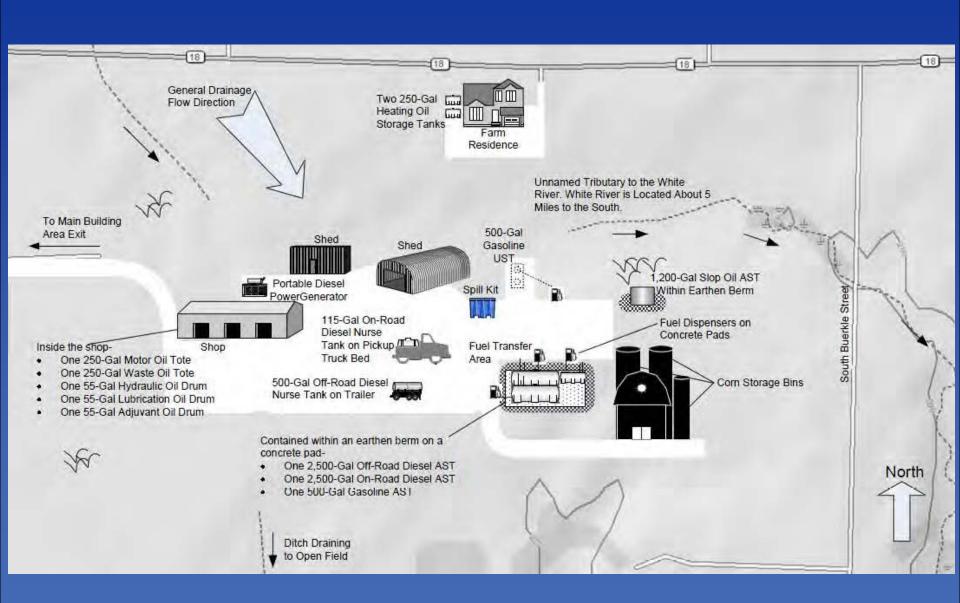
### Doe's Family Farm

#### Spill History:

- The farm had the following discharges in the three years prior to the date that Mr. Doe certified his Plan (04/12/2011):
- August 12, 2009 50 gallons gasoline reached the White River;
- January 20, 2010 100 gallons diesel oil (25 gal. to the tributary to the White River);
- September 16, 2010 60 gallons diesel oil to secondary containment.



### **Facility Diagram**



# Does the Doe Family Farm Need an SPCC Plan?

- Is the facility or part of the facility considered nontransportation related?
  - Yes, the facility stores, uses, and consumes oil all non-transportation related activities.
- Is the facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil?
  - Yes, the facility stores, uses, and consumes oil.
- Could the facility reasonably be expected to discharge oil in quantities that may be harmful into navigable waters or adjoining shorelines?
  - Yes, an oil spill from the facility could reach the tributary that leads to the White River.

# Does the Doe Family Farm Need an SPCC Plan? (cont.)

- Is the total aggregate capacity of aboveground oil storage containers greater than 1,320 gallons of oil; or is the total aggregate capacity of completely buried storage tanks greater than 42,000 gallons of oil?
  - Yes, the aboveground oil storage capacity is 7,980 gallons.

**CONCLUSION:** An oil spill from the Doe Family Farm may reach a navigable waterway and the aboveground oil storage capacity is greater than 1,320 gallons. John Doe needs to develop an SPCC Plan.

# Can John Doe Certify the SPCC Plan and Complete a Tier I Template?

- Has the facility had any oil spills that reached navigable waters in the past three years?
  - Yes, oil spills from this facility can and did reach navigable waters.
- Were any of these oil spills larger than 1,000 gallons?
  - No.
- Was oil spilled to navigable waters more than once in a 12-month period?
  - Yes, on August 12, 2009 and again on January 20, 2010.

# Can John Doe Certify the SPCC Plan and Complete a Tier I Template? (cont.)

- Did more than 42 gallons of spill oil reach navigable waters in both discharges?
  - No. On January 20, 2010 only 25 gallons reached navigable waters. Although the farm had two discharges of oil to navigable waters, there was no single discharge of oil to navigable waters exceeding 1,000 U.S. gallons, nor two discharges of oil to navigable waters each exceeding 42 U.S. gallons within any twelve-month period.
- Is the aboveground oil storage capacity 10,000 gallons or less?
  - Yes, the Doe Family Farm is a qualified facility and John Doe can certify the SPCC Plan.

# Can John Doe Certify the SPCC Plan and Complete a Tier I Template? (cont.)

- Are any aboveground oil storage containers at the farm larger than 5,000 gallons capacity?
  - No.

**CONCLUSION**: The Doe Family Farm is a Tier I Qualified Facility and John Doe can complete the SPCC Plan template in Appendix G of the rule (as long as he does not deviate from any rule requirements).

### Cover Page: Instructions

- Can be completed electronically or handwritten on printed copy
  - A hardcopy of the final Plan must be kept at facility
- Template covers all SPCC requirements for a Tier I qualified facility
- Becomes the facility's SPCC Plan when fully completed
- A checked box on the template indicates that the requirement has been adequately addressed
- Not all items/sections of the template are applicable to all facilities.
  - Non-applicable items can be identified/checked as "N/A"
- Some sections require written descriptions and/or listings



#### 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	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		



Need more information? Each section highlights the rule requirements that apply

#### 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 John Doe 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.

Ver. 1-E-doc-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;
  - 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:	Owner
Name	John Doe	Date:	04 / 12 / 2011



#### 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 amend this Plan as a result.

	Table G-	13 Review and Eval	uation of SPCC Plan for Facility	
Review Date		nendment	Name and signature of person authorized to review this	
	Will Amend	Will Not Amend	Plan	
EX: 4/16/16			John Doc	
			Table I	located as an
			of the	ocated as an ent at the end e template



#### ATTACHMENT 1.2 - Technical Amendment Log

Any technica	al amendments to this Plan will be re-certified in accord	
	Table G-15 Description and Certi Description of Technical Amendment	fication of Technical Amendments
Review Date	Description of Technical Amendment	Name and signature of person certifying this technical amendment
EX: 5/12/11	Added a 500-gallon gasoline AST.	John Doc
		ε

Table located as an attachment at the end of the template

#### 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 and completely buried $\boxtimes$ tanks<sup>b</sup>) 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 Type of Oil Shell Capacity (gallons) aboveground (A) or completely buried (B)) A - Horizontal, single wall, cylindrical UL-142 Diesel, off-road 2,500 steel tank #1 on concrete saddles and pad A - Horizontal, single wall, cylindrical UL-142 Diesel, on-road 2,500 steel tank #2 on concrete saddles and pad A - Horizontal, single wall, cylindrical UL-142 Gasoline 500 steel tank #3 on concrete saddles and pad A - Vertical, single wall, cylindrical UL 142 steel Slop oil 1.200 tank #4 on ground A - Steel tank mounted on trailer Diesel, off-road 500 A – Steel tank mounted on pickup truck Diesel, on-road 115 A – Polyethylene tote #1 (single use) Motor oil 250 A – Polyethylene tote #2 (single use) Waste oil 250 55 A – Steel drum #1 (single use) Hydraulic oil A – Steel drum #2 (single use) Lubrication oil 55 A – Steel drum for adjuvant oil Adjuvant oil 55 B - Horizontal, single wall, cylindrical UL 58 steel Gasoline 500 UST

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

<sup>&</sup>lt;sup>a</sup> 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.

<sup>&</sup>lt;sup>b</sup> 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.

<sup>&</sup>lt;sup>c</sup> Counts toward qualified facility applicability threshold.

#### . 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<sup>a</sup> 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.



<sup>a</sup> 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.









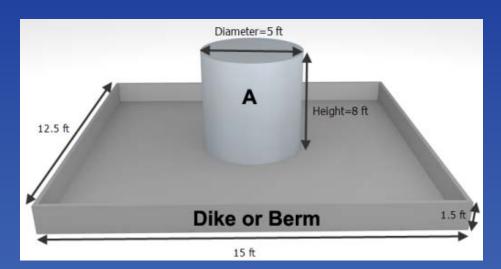
### **Example Calculation:**

## Single Vertical Cylindrical Tank Inside a Rectangular or Square Dike or Berm

#### Steps:

- Determine the volume of the secondary containment,
   V<sub>SC</sub>
- 2a. Determine the volume of the tank when the tank shell capacity is unknown, V<sub>Tank</sub>
- 2b. Determine the volume of the tank when shell capacity is known, V<sub>Tank</sub>
- 3. Determine the percentage of the secondary containment volume, V<sub>SC</sub> to the tank volume, V<sub>Tank</sub>
- 4. Determine whether the secondary containment can contain the entire tank shell capacity with additional capacity to contain rain.

- Tank shell capacity
   In this example the tank is
   1,200 gallons, the tank
   diameter is 5 ft, and tank
   height is 8 ft.
- 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 7 inches.



1. Determine the volume of the secondary containment, V<sub>SC</sub>

Secondary Containment Area, 
$$A_{SC} = \begin{bmatrix} 15 & x & 12.5 \\ Length & Width \\ (ft) & (ft) \end{bmatrix}$$

$$= \begin{bmatrix} 187.5 & ft^2 \\ b & \end{bmatrix}$$

$$V_{SC} (ft^3) = \begin{bmatrix} 187.5 & x & 1.5 \\ b & \end{bmatrix} = \begin{bmatrix} 281.3 & ft^3 \\ (ft^2) & (ft) \end{bmatrix}$$

2a. Determine the volume of the tank when the tank shell capacity is unknown, V<sub>Tank</sub> (In this example we know the tank capacity so we skip this step.)

2b. Determine the volume of the tank when shell capacity is known, V<sub>Tank</sub>

a is the tank shell capacity from page 1. 
$$V_{Tank}$$
 (ft<sup>3</sup>) = 1,200 x 0.1337 = 160.4 ft<sup>3</sup> a (gal) tt<sup>3</sup>/gal e

9

3. Determine the percentage of the secondary containment volume, V<sub>SC</sub> to the tank volume, V<sub>Tank</sub><sup>1</sup> (to determine whether the volume of the containment is sufficient to contain the tank's entire shell capacity).

$$V_{SO}/V_{Tank} = \begin{bmatrix} 281.3 & \div & 160.4 \\ 281.3 & \div & 160.4 \\ & & c \text{ is the secondary contianment volume.} \\ & & d \text{ or e} \\ & & (ft^3) & & (ft^3) \end{bmatrix}$$

$$\% = \begin{bmatrix} 1.75 & \times & 100 \\ & & & g \end{bmatrix}$$

4 Det

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

Selected Rainfall Event:

24— Hr 25— Yr

Rainfall (in) = 
$$\begin{bmatrix} 7.0 & \text{in} \\ h \end{bmatrix}$$

Rainfall (ft) =  $\begin{bmatrix} 7.0 & \text{in} \\ h \end{bmatrix}$ 

Rainfall (ft) =  $\begin{bmatrix} 7.0 & \text{in} \\ h \end{bmatrix}$ 

Volume of Rain to be Contained,  $V_{Rain}$  (ft<sup>3</sup>) =  $\begin{bmatrix} 0.6 & \text{x} \\ \text{i} \end{bmatrix}$ 

Volume of Rain to be Contained,  $V_{Rain}$  (ft<sup>3</sup>) =  $\begin{bmatrix} 0.6 & \text{x} \\ \text{i} \end{bmatrix}$ 

Volume of Rain to be Contained,  $V_{Rain}$  (ft<sup>3</sup>) =  $\begin{bmatrix} 0.6 & \text{x} \\ \text{i} \end{bmatrix}$ 

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

i (ft) b (ft<sup>2</sup>) j

Total Containment Capacity Required (ft<sup>3</sup>) =  $\begin{bmatrix} 112.5 & \text{the } 160.4 \\ \text{d or e} \\ \text{in Step 2 of this worksheet} \end{bmatrix}$ 
 $\begin{bmatrix} 112.5 & \text{the } 160.4 \\ \text{d or e} \\ \text{(ft}^3) \end{bmatrix}$ 
 $\begin{bmatrix} 272.9 & \text{ft}^3 \\ \text{k} \end{bmatrix}$ 

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 Secondary Potential Direction of containment Secondary containment discharge flow for Type of failure (discharge scenario) Area volume uncontained methoda capacity (gallons) discharge (gallons) Bulk Storage Containers and Mobile/Portable Containers Tank overfill, fitting leak, seam Concrete pad and 2,500 gal off-road diesel tank 10 - 2.500South East 6.732 failure earthen berm Tank overfill, fitting leak, seam Concrete pad and 2,500 gal on-road diesel tank 10 - 2,500South East 6,732 earthen berm failure Tank overfill, fitting leak, seam Concrete pad and 500 gal gasoline tank 10 - 500South East 6,732 earthen berm failure Tank overfill, fitting leak, seam 1,200 gal slop oil tank 1 - 1.200South East Earthen berm 2,104 failure Tank overfill or fitting leak Radial Spill kit 500 gal off-road diesel tank on trailer Absorbs up to 25 115 gal on-road diesel tank on pickup truck Tank overfill or fitting leak Radial Spill kit Absorbs up to 25 Spill containment pallet 250 gal motor oil tote (inside shop) Fitting leak Radial 300 250 gal waste oil tote (inside shop) Tank overfill Radial Spill containment pallet 300 < 1 55 gal hydraulic oil drum (inside shop) Fitting leak Radial Spill containment pallet 66 < 1 55 gal lubrication oil drum (inside shop)) 66 Fitting leak < 1 Radial Spill containment pallet 55 gal adjuvant oil drum (inside a shed) Radial 66 Fitting leak Spill containment pallet < 1 500 gal gasoline UST Tank overfill 2.5 - 15South East Double wall > 500 Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers) None Piping, Valves, etc. Aboveground piping between diesel and Concrete pad and Fitting leak or failure South East 6.732 gasoline tanks and dispensers earthen berm double wall buried Buried piping between gasoline UST and Radial below Fitting leak or failure Double wall dispenser ground piping Motor, hydraulic, lubrication, and adjuvant Fitting leak or failure, hose failure Spill kit < 1 Radial Absorbs up to 25 oil dispensing hoses Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.) Receiving tank overfill, fitting leak Diesel and gasoline fuel transfer area Spill kit Absorbs up to 25 1 - 15South East or failure, fuel transfer hose failure Refueling areas at the personal vehicle Receiving container overfill, fitting Radial or gasoline dispenser and UST and in the leak or failure, fuel transfer hose Spill kit 1 - 15Absorbs up to 25 South Fast field near equipment failure Other Oil-Handling Areas or Oil-Filled Equipment (e.g. flow-through process vessels at an oil production facility) None

<sup>&</sup>lt;sup>a</sup> 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.

<sup>&</sup>lt;sup>b</sup> 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. <sup>c</sup> 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.

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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) An assigned knowledgeable farm employee does periodic visual inspections of the farm's aboveground oil storage containers, including all aboveground container piping 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. The assigned farm employee also conducts monthly tank gauging of the gasoline UST and interstitial monitoring of the buried transfer piping between the UST and the dispenser and documents the monthly monitoring in Attachment 3.1. In addition, hydrostatic testing of the UST and buried piping will be conducted by a tester licensed by the state at least every five years and at time of installation, modification, construction, relocation, or replacement. Such leak testing will also be documented in Attachment 3.1.
- 2) The liquid level gauges on the off-road diesel, on-road diesel, and gasoline ASTs are also adjusted, tested, and inspected monthly following the gauge manufacturer's procedures by the assigned farm worker; Attachment 3.1 documents these inspections.
- 3) An assigned knowledgeable farm employee also visually inspects the dispensers at the Fuel Transfer Area for indications of deterioration and discharges, including the transfer hoses and fittings, at least monthly.
- 4) Farm workers inspect the earthen berm containments on a weekly basis for signs of deterioration, discharges (leaking tanks or piping), or accumulation of oil. In addition, farm workers inspect the berm containments after any heavy rainfall. These inspections are documented in Attachment 3.1. As the berm containments do not have drains, the collected rain is pumped from the berm containments by using a portable pump but only after the inspection shows that there is no oil or oil sheen present. If oil or oil sheen is detected on rainwater in the berm, then oily rainwater is pumped into the 250-gal waste oil tote for disposal by the waste oil hauler contractor or the contractor is requested to remove the oily rainwater in the berm contents 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 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.

Inspections, tests, and records are conducted in accordance with written procedures developed for the facility.	$\boxtimes$
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.	$\boxtimes$
[§112.7(e)] [See Inspection Log and Schedule in Attachment 3.1]	

#### ATTACHMENT 3 – Inspections, Dike Drainage and Personnel Training Logs

#### ATTACHMENT 3.1 – Inspection Log and Schedule

		<b>-</b> 11 <b>-</b> 121				
This log is i	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 <sup>a</sup>	
	Aboveground pipes	Visual inspections				
	Buried pipes	Monthly interstitial monitoring and leak testing at time of installation, modification, construction, relocation, or replacement		Table loc attachmer	cated as an	
					cated as an nt at the end emplate	

### Table G-16 (cont.)

This log is in	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 <sup>a</sup>	
	ASTs  2,500-gal. off-road diesel tank #1  2,500-gal, on-road diesel tank #2  1,200-gal. slop oil tank #4  500-gal. gasoline tank #3  250-gal. motor oil and waste oil totes:  55-gal steel hydraulic, lubrication, and adjuvant oil drums  Trailer-mounted Fuel nurse tank	Visual inspections (STI SP001, Standard for the Inspection of Aboveground Storage Tanks)		Table loca attachment of the ter	ted as an	
	Pickup truck fuel nurse tank					
	UST 500-gal gasoline tank	Hydrostatic test at least every 5 years and monthly tank gauging (40 CFR part 280 and AR Department of Department of Environmental Regulation 12 (Storage Tanks)				



### Table G-16 (cont.)

Secondary containment earth berm	Weekly visual inspections and after heavy rainfall		
Container liquid level gauges	Tests and inspections following manufacturer's procedures	Table locate attachment	□ ed as an
		attachment a of the tem	t the end
Dispensers	Inspections (manufacturer and installer instructions)		

<sup>&</sup>lt;sup>a</sup> Indicate in the table above if records of facility inspections are maintained separately at this facility.

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Inspections and tests are signed by the appropriate supervisor or inspector. [§112.7(e)]	$\boxtimes$
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)]	$\boxtimes$
A person who reports to facility management is designated and accountable for discharge prevention. [§112.7(f)]	$\boxtimes$
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]	



#### ATTACHMENT 3.4 – Oil-handling Personnel Training and Briefing Log

	Date	Table G-19 Oil-Handli Description / Scope	ng Personnel Training and Briefing Log Attendees	
	EX: 5/15/11	Annual training for personnel.	John Doe	
	EA. 5/15/11	Affilial training for personner.	Mike Smith	
			Jane Tank	
			Sally Trailer	
	_			
	22			
Table locate	d as all			
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#### 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:

- 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.
- 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.



#### 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 [ $\S112.7(a)(3)(iv)$  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.
  - 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).



Table G-8 Co	ntact 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:	Office: 870-555-1651		
James Johnson, Production Manager	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		
Other State, Federal, and Local Agencies EPA Region VI	Office: 214-665-6701 Emergency: 1-866-372-7745		
Arkansas County Office of Emergency Management	870-673-3730		
Local Fire Department	911		
Local Police Department	911		
Hospital Mercy General Hospital 1221 Franklin Blvd., Stuttgart, AR 72160-3000	870-555-1112		
Other Contact References (e.g., downstream water intakes or neighboring facilities)			
Steven T. Barney, Daily Dairy Farm	870-555-6770 (Office)		
Sharon Fields, Fields Farm	870-555-0069 (Office), 870-555-4107 (Cell)		

#### 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.



### Attachment 4

Table located as an attachment at the end of the template

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	EX: 6/1/11	Time	08:00 AM			
Facility Name	Doe's Family Farm		1			
Facility Location (Address/Lat- Long/Section Township Range)	2024 South Buerkle Str	eet, Stuttgart, AR 72160				
Name of reporting individual	John Doe   Telephone # 870-163-1651					
Type of material discharged	Diesel	Estimated total quantity discharged	Gallons/Barrels 2,500			
Source of the discharge	AST	Media affected	☐ Soil ☐ Water (specify)			
			Other (specify)			
Actions taken	Spill was contained and	cleaned up as appropriate.				
Damage or injuries	⊠ No ☐ Yes (specify)	Evacuation needed?	⊠ No ☐ Yes (specify)			
Organizations and individuals	National Response (	Center 800-424-8802 Time	08:02 AM			
contacted						
	☐ Facility personnel (Specify) Time 08:02 AM					
	State Agency (Speci					
Other (Specify) Time						



#### 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)

- 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.

Note: only Section A applies to the farm in this scenario



#### 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)]		$\boxtimes$	
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		$\boxtimes$	
Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters or adjoining shorelines			
<ul> <li>Bypass valve is opened and resealed under responsible supervision</li> </ul>	Bypass valve is opened and resealed under responsible supervision		
Adequate records of drainage are kept [See Dike Drainage Log in Attachment 3.3]	$\boxtimes$		

## 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 Observations	Signature of Inspector
EX: 6/12/11					A sump pump is used to remove accumulated water. No sheen was observed and water was released.	Tom Tanks
						Table located as an
						Table located as an attachment at the end of the template

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

# 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			
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				
55 to 1,100 gallons with sized secondary containment:	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside bermed area			
500-gal. gasoline tank #3	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 <sup>a</sup> :	Table located as an attachment at the end			
2,500-gal. off-road diesel tank #1 2,500-gal, on-road diesel tank #2	attachment as of the template			
1,101 to 5,000 gallons with sized secondary containment and no method of leak detection <sup>a</sup> :	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas,			
1,200-gal, slop oil tank #4	plus any annual inspection elements and other specific integrity tests that may be required per industry inspection standards			

<sup>&</sup>lt;sup>a</sup> Examples of leak detection include, but are not limited to, double-walled tanks and elevated containers where a leak can be visually identified.

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:		
<ul> <li>Tank truck fuel delivery procedures:</li> <li>1) Gauge AST and check the level gauge to prevent tank overfill.</li> <li>2) Set parking brake and use chock blocks to prevent movement; inspect fittings and fueling hose for damage.</li> <li>3) Place drip pans under valve-hose fitting connections.</li> <li>4) Monitor the liquid level in the receiving tank during transfer to prevent tank overfill.</li> <li>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.</li> </ul>		
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)]	$\boxtimes$	
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)]	$\boxtimes$	
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)]	$\boxtimes$	

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#### 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. NOT APPLICABLE

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 Rem Contingency Plans (§109.5) <sup>a</sup>	noval
(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:	
<ol> <li>The identification of critical water use areas to facilitate the reporting of and response to oil discharges.</li> <li>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.</li> </ol>	
(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.	

Note:
No contingency
plan is required for
the farm in this
scenario

<sup>&</sup>lt;sup>a</sup> The contingency plan must be consistent with all applicable state and local plans, Area Contingency Plans, and the National Contingency Plan (NCP)

# Part III: Questions and Answers



## For More Information

- EPA's SPCC web page
  - http://www.epa.gov/emergencies/content/spcc/index.htm
- EPA's SPCC for Agriculture web page
  - http://www.epa.gov/osweroe1/content/spcc/spcc\_ag.htm
- EPA Oil Spill and Emergency Management web pages
  - www.epa.gov/oilspill
  - www.epa.gov/emergencies
- HOTLINE: Superfund, TRI, EPCRA, RMP, and Oil Information Center
  - (800) 424-9346 or (703) 412-9810
  - TDD (800) 553-7672 or (703) 412-3323
  - www.epa.gov/superfund/resources/infocenter

## **Available Tools**

- Available on EPA's SPCC web page and EPA's SPCC for Agriculture web page
  - Tier I Template
  - Example Tier I SPCC Plan
  - Secondary Containment Calculation Worksheets and Examples

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# Questions?