
SPCC/FRP Inspections

Common Field Violations

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Common Issues

- Lack of SPCC Plan or FRP
 - Plan is not updated with latest changes
 - Signature by manager and/or engineer
 - Lack of training
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Dike Drainage

40 CFR 112.8(b)



Dike Drainage

40 CFR 112.8(b)



Facility Transfer Operations

40 CFR 112.8(d)(3)



Facility Transfer Operations

40 CFR 112.8(d)(3)



Facility Transfer Operations

40 CFR 112.8(d)(3)



Facility Transfer Operations

40 CFR 112.8(d)(3)



Secondary Containment

40 CFR 112.8(c)



Secondary Containment



40 CFR 112.7(k)



40 CFR 112.8(c)



Secondary Containment

40 CFR 112.8 (c)(11)



Secondary Containment

40 CFR 112.8 (c)



Secondary Containment

40 CFR 112.8 (c)



Security

40 CFR 112.7(g)



Security

40 CFR 112.7(g)



Security

40 CFR 112.7(g)



Bulk Storage Containers

40 CFR 112.8(c)(10)



Questions



Finalized Amendments to the SPCC Rule – November 2008

On December 5, 2008, the Federal Register published EPA's final rule to amend the SPCC rule in order to:

- Provide increased clarity,
- Tailor requirements to particular industry sectors, and
- Streamline certain requirements for those facility owners or operators subject to the rule, which should result in greater protection to human health and the environment.

This rule will become effective January 14, 2010.

Overview of Amendments

- Exempt hot-mix asphalt and hot-mix asphalt containers
- Exempt pesticide application equipment and related mix containers
- Exempt heating oil containers at single-family residences



(continues...)



Overview of Amendments

- Exempt USTs at nuclear power generation stations
 - ❑ deferred under 40 CFR part 280
 - ❑ supply emergency diesel generators at facilities licensed by Nuclear Regulatory Commission (NRC)
 - ❑ meet the NRC design criteria and quality assurance criteria

(continues...)



Overview of Amendments

- Amend the definition of “facility”



“...any mobile or fixed, onshore or offshore building, property, parcel, lease, structure, installation, equipment, pipe, or pipeline (other than a vessel or a public vessel) used in oil well drilling operations, oil production, oil refining, oil storage, ..., as described in Appendix A to this part. The boundaries of a facility depend on several site-specific factors, including but not limited to, the ownership or operation of buildings, structures, and equipment ...”

(continues...)

Overview of Amendments

- Define and clarify requirements for a “loading/unloading rack”



“...a fixed structure (such as a platform, gangway) necessary for loading or unloading a tank truck or tank car, which is located at a facility subject to the requirements of this part. A loading/unloading rack includes a loading or unloading arm, and may include any combination of the following: piping assemblages, valves, pumps, shut-off devices, overfill sensors, or personnel safety devices.”

(continues...)

Overview of Amendments

- Provide further streamlined requirements for a subset of qualified facilities (“Tier I”) and allow use of an SPCC Plan template

If the facility has...	And...	And the facility has...	Then:
10,000 U.S. gallons or less aggregate aboveground oil storage capacity;	Within any twelve-month period, three years prior to the Plan certification date, or since becoming subject to the SPCC rule if in operation for less than three years, there has been: (1) No single discharge of oil to navigable waters or adjoining shorelines exceeding 1,000 U.S. gallons; and (2) No two discharges of oil to navigable waters or adjoining shorelines each exceeding 42 U.S. gallons	No individual aboveground oil containers greater than 5,000 U.S. gallons;	Tier I: Complete and self-certify Plan template (Appendix G to 40 CFR part 112) in lieu of a full PE-certified Plan.
		Any individual aboveground oil container greater than 5,000 U.S. gallons;	Tier II: Prepare self-certified Plan in accordance with all applicable requirements of §112.7 and subparts B and C of the rule, in lieu of a PE-certified Plan.

(continues...)



Other Revisions

Revision to General Secondary Containment

- Clarifies that the general secondary containment requirement is intended to address the most likely oil discharge from any part of a facility
- Allows active and passive secondary containment

New text: "...In determining the method, design, and capacity for secondary containment, you need only to address the typical failure mode, and the most likely quantity of oil that would be discharged. Secondary containment may be either active or passive in design."

- Modifies §112.7(c) to expand the list of example prevention systems for onshore facilities
 - Additional examples: drip pans, sumps, and collection systems
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Other Revisions

Non-Transportation-Related Tank Trucks

- In 2006, EPA exempted mobile refuelers from the sized secondary containment requirements applicable to bulk storage containers.



- This exemption is now extended to non-transportation-related tank trucks at a facility subject to the SPCC rule.
 - ❑ Does not include mobile/portable containers that generally operate in fixed locations at a facility
 - ❑ Does not include tanker trucks used to supplement storage and serving as a fixed tank
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Other Revisions

Security Requirements

- Security requirements that were finalized for qualified facilities in December 2006 are now required for all applicable facilities
 - ❑ More streamlined, performance-based
 - ❑ Tailored to the facility's specific characteristics and location

 - A facility owner/operator is required to describe in the SPCC Plan how he will:
 - ❑ Secure and control access to all 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; and
 - ❑ Address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.
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Other Revisions

Integrity Testing

- Streamlined integrity testing requirements that were finalized for qualified facilities in December 2006 are now required for all applicable facilities.
 - Provides flexibility in complying with bulk storage container inspection and integrity testing requirements. Requires owner/operator to:
 - Test/inspect each aboveground container for integrity on a regular schedule and whenever material repairs are made
 - Determine, in accordance with industry standards, the appropriate qualifications of personnel performing tests and inspections and the frequency and type of testing and inspections, which take into account container size, configuration, and design.
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*Effective Date of SPCC Rule
Amendments*

January 14, 2010