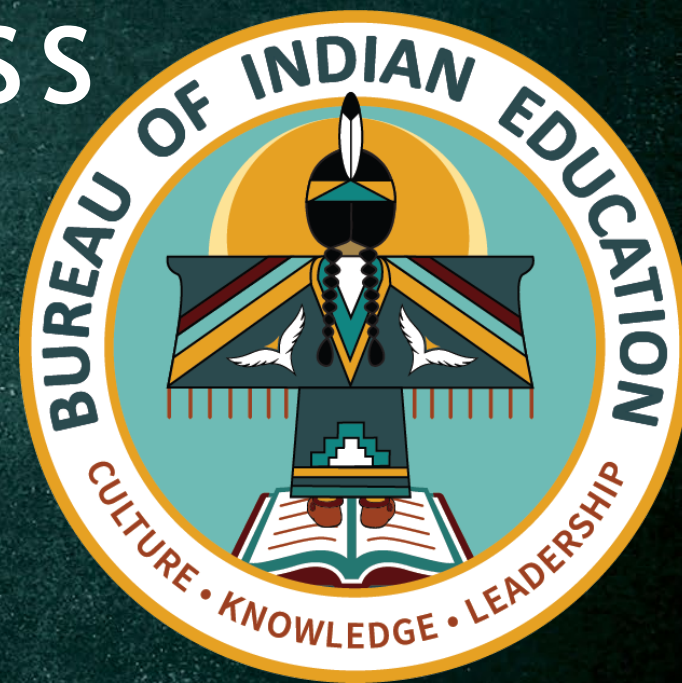




U.S. Department of the Interior
Bureau of Indian Education

.....

SPILL PREVENTION, COUNTERMEASURES, AND CONTROL (SPCC) AWARENESS





OBJECTIVE

To enhance awareness and understanding of spill prevention, countermeasure, and control (SPCC) rules to promote compliance with applicable requirements and ensure a safer and more environmentally conscious workplace

MEETING TIPS FOR ONLINE TRAINING

- ❖ 1). Place yourself on “Mute” to prevent background noise.
- ❖ 2). Use the “Chat with all” feature to ask questions.
 - ❖ Note: All participants will be able to see your comments or questions.
- ❖ 3). Every participant will receive a certificate of completion.



BIE BRANCH OF ENVIRONMENTAL MANAGEMENT (BEM) WHO WE ARE...

Albuquerque Office

John Clymo, Program Manager, Supervisory Environmental Protection Specialist

Candace DeSantis, Lead Environmental Protection Specialist

Karlisa Benally, Environmental Protection Specialist

Priscilla Avila, Environmental Protection Specialist

Henryetta Price, Environmental Protection Specialist

Rochelle Mariano, Program Support Assistant

Bloomington Office

Russell Brigham, Environmental Protection Specialist

Window Rock Office

Karmen Billey- Badonie, Environmental Protection Specialist

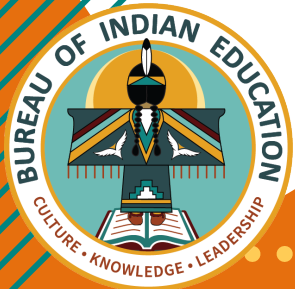


AGENDA

- ❖ SPCC History
- ❖ SPCC Regulations and Applicability
 - ❖ Storage Tank Overview
- ❖ SPCC Plan Development
- ❖ SPCC Implementation
- ❖ SPCC Response
- ❖ SPCC Common Violations

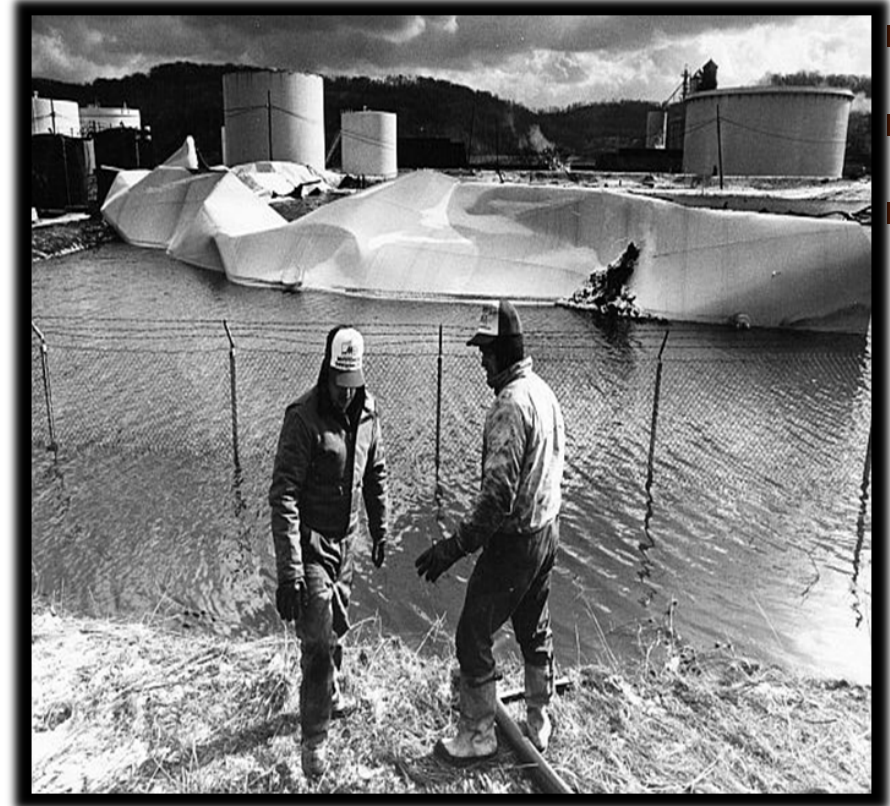


SPCC History



SPCC HISTORY

- 1974: Original Spill Prevention Control and Countermeasure (SPCC) rule published under the Clean Water Act (CWA)
- 1988: Ashland Oil Spill
 - AST split apart in Floreffe, PA
 - 4-million gallons of oil released
 - Monongahela River contaminated
 - Wide-spread damage



Picture Source: Pittsburgh Post-Gazette



SPCC HISTORY

Oil Pollution Act – Amended the CWA

1990

Final Facility Response Plan rule published

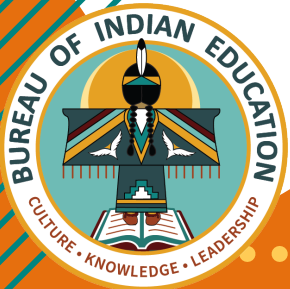
1994

1991

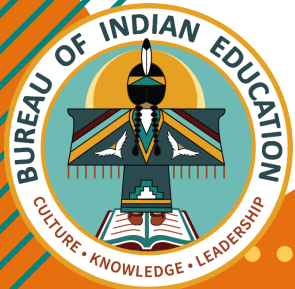
Revisions to SPCC rule proposed

2002

Final “revised” SPCC rule published



SPCC Regulations Applicable to Schools



40 CFR PART 112

- **Legal Authority**
 - Section 311(j)(1)(C) of the Clean Water Act as amended by the Oil Pollution Act of 1990
- **Federal Register**
 - [Related Federal Register Notices](#)
- **Code of Federal Regulations**
 - [40 CFR 112](#)



Basic Information

Legal Authority:

Section 311(j)(1)(C) of the Clean Water Act as amended by the Oil Pollution Act of 1990

Federal Register:

[Related Federal Register Notices](#)

Code of Federal Regulations:

[40 CFR 112](#)

Image Source: [U.S. EPA](#)

40 CFR PART 112

- Oil Pollution Prevention Regulation
 - Prevent from discharging into navigable waters
 - Prepare for and respond to discharges
- Requires qualifying facilities to prepare and implement a Spill Prevention Control and Countermeasure (SPCC) Plan



STATE, LOCAL AND TRIBAL REGULATIONS

NOTE:

- This presentation provides an overview of federal SPCC requirements
- Your state or tribe may have additional requirements that are must be met, or requirements that are more stringent than the federal requirements



SPCC APPLICABILITY

- Produce, store, process, refine or consume oil
- Potential to discharge oil to navigable waters with capacity to store:
 - >1,320 gallons of oil above ground
 - >42,000 gallons of oil below ground
 - Includes \geq 55-gallon storage containers
- If your school does not meet these criteria, you are not subject to SPCC rules
 - But...it is always a good idea to implement some of these measures as best practices, where appropriate.



REGULATORY DEFINITIONS- NAVIGABLE WATERS

- **Traditional**
 - Rivers
 - Lakes
 - Tributaries
- **Conduits**
 - Storm Drains
 - Ditches
 - Wetlands



REGULATORY DEFINITIONS- OIL COVERED BY SPCC RULE



- Petroleum
- Fuel Oil
- Synthetic Oil
- Hydraulic Oil
- Mineral Oil (transformers)
- Vegetable Oil
- Fats/Grease

Note: "Oil" includes both new/unused oil and used oil, as well as waste fuel.



STORAGE TANKS OVERVIEW

- Storage tanks are one type of bulk storage container covered by the SPCC regulation



- Common Tanks:
 - Underground Storage Tanks (UST)
 - Above Ground Storage Tanks (AST)
- Fuel Uses:
 - Heating
 - Boilers
 - Generators
 - Transportation

STORAGE TANKS OVERVIEW

- **Exceptions**
 - Propane storage tanks are not covered by SPCC regulation, so they are not discussed in this presentation
- **Exemptions**
 - Heating oil USTs are exempt under federal regulations
 - However...some states or tribes may regulate heating oil USTs
 - **Example:** In Montana's regulations, tanks storing heating oil for consumptive use on the premises are NOT excluded or exempted from most of the state requirements



STORAGE TANK REQUIREMENTS



- Installation Specifications
- Spill and Overfill Prevention
- Monitoring
- Leak Detection
- Reporting
- Inspections



STORAGE TANK REQUIREMENTS

ABOVE GROUND STORAGE TANKS (AST)



- SPCC Plan Requirements
- State/Local Fire Marshall
- Spill/Release Response
- Tier II Reporting under Emergency Planning and Community Right-to-Know Act (EPCRA) Section 312



SPCC EXCLUSIONS



Pipelines and oil transportation vessels



Containers < 55-gallons



Permanently closed containers



Underground Storage Tanks (UST) subject to requirements of 40 CFR 280/281 (UST regulations)

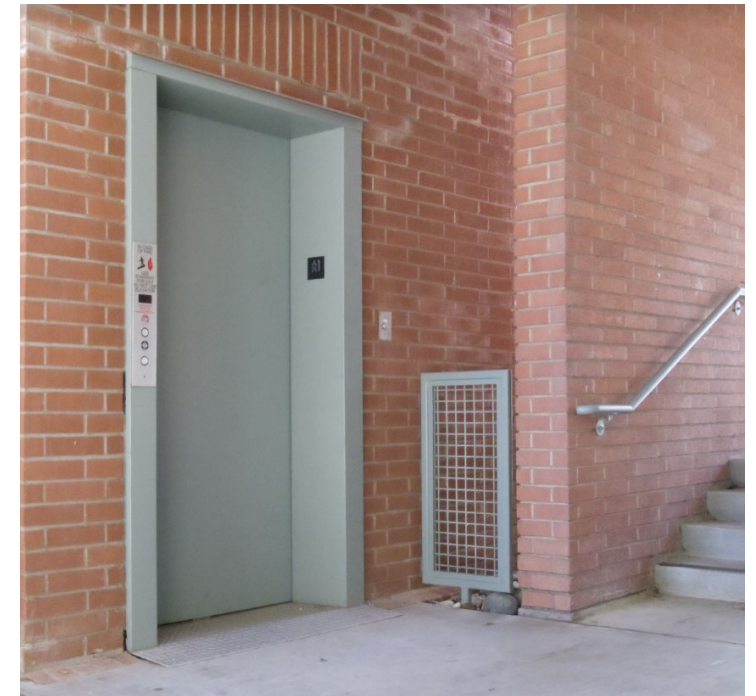


Motor Vehicle Tanks



OIL-FILLED EQUIPMENT

- Equipment that includes oil storage container and associated piping that is intrinsic to operation of the equipment in which the oil is present solely to support the function of the device.
- Oil filled equipment is NOT considered a bulk storage container
- Oil storage capacity of oil-filled equipment still counts towards total storage capacity of the facility
- Examples include:
 - Hydraulic systems
 - Lubricating system for pumps, compressors, etc.
 - Machining cooling systems
 - Circuit breakers
 - Transformers

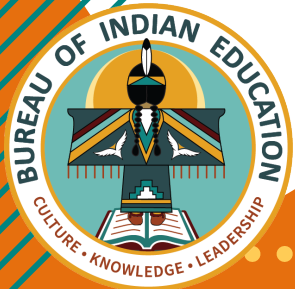


WHAT TO COUNT WHEN DETERMINING YOUR SCHOOL'S AGGREGATE OIL CAPACITY

- All aboveground containers and tanks \geq 55 gallons capacity, don't forget to include"
 - Emergency generator belly tanks
 - Food grease bins/dumpsters/drums
 - Hydraulic fluid reservoirs (elevators, hoists/lifts)
 - School-owned oil-filled transformers
- Do not count your propane tanks



SPCC Plan Development



SPCC QUALIFIED FACILITIES



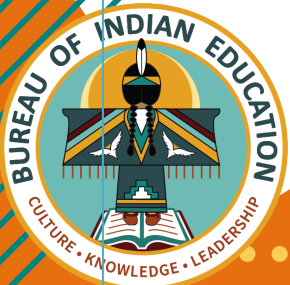
- Streamlined requirements for facilities with smaller oil storage that meet certain criteria
- Optional self-certification alternative to P.E. certification
- Who can self-certify?
 - Someone familiar with SPCC requirements and the facility
 - Legal “owner or operator”
 - May require assistance from a BIE Branch of Environmental Management representative or contact the U.S. EPA Regional SPCC Coordinator



SELF-CERTIFICATION OPTIONS

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 3 years prior to Plan date, the facility has not had: <ul style="list-style-type: none">• One discharge to waters or shorelines<ul style="list-style-type: none">• >1,000 gallons OR• Two discharges each >42 gallons within any 12- month period	No individual aboveground oil containers >5,000 gallons	Tier I Qualified Facility ☐ Complete and self-certify SPCC Plan template (Template available here) <u>in lieu of</u> full SPCC Plan and P.E. certification https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/tier-i-qualified-facility-spcc-plan-template
	Any individual aboveground oil containers >5,000 gallons	Tier II Qualified Facility ☐ Prepare a self-certified SPCC Plan <u>in lieu of</u> P.E. certification



SPCC PLAN REQUIREMENTS



Include

Plan must include all operations and all oil-containing storage tanks with capacity \geq 55-gallons

Describe

Describe control measures to prevent a discharge

Describe

Describe procedures to respond to a release



SPCC PLAN ELEMENTS



- ✓ Facility diagram
- ✓ Facility drainage
- ✓ Secondary containment
- ✓ Security
- ✓ Inspections
- ✓ Integrity testing
- ✓ Transfer procedures
- ✓ Training
- ✓ Recordkeeping
- ✓ Plan review
- ✓ P.E. certification
- ✓ Substantial harm criteria



SPCC PLANS



- **Site Evaluation**
 - Oil Storage
 - Plant/Facility Layout
 - Flow Direction
- **Prevention and Control**
 - Containment
 - Spills
 - Inspections
 - Training



SPCC INVENTORY

OIL STORAGE INVENTORY

Table 5: Oil Storage

ID	STORAGE CAPACITY (gallons)	FIXED or PORTABLE TANK?	CONTENT	DESCRIPTION
1	10,000	Fixed	Diesel Fuel	Aboveground tank
2	10,000	Fixed	Diesel Fuel	Aboveground tank
3	1,500	Fixed	Diesel Fuel	Aboveground tank
4	3,500	Portable	Asphalt –Tack Oil	Tack oil distributor truck
5	850	Portable	Diesel Fuel	Portable tank
6	850	Portable	Diesel Fuel	Portable tank
7	385	Fixed	Used Oil	Aboveground tank
8	55*8	Portable	Hydraulic Fluid	Drum
9	115	Portable	Diesel Fuel	Portable tank
10	150	Portable	Diesel Fuel	Portable tank
11	130	Portable	Diesel Fuel	Portable tank

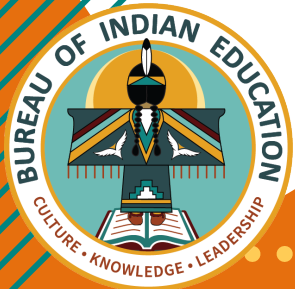
Total Oil Storage= 27,920 gallons

SECONDARY CONTAINMENT

- Hold capacity of largest container + precipitation and be impervious to contained materials [112.8(c)(2)]
 - Dikes
 - Berms
 - Retaining walls
 - Curbing
 - Built-in containment
 - Double-walled tanks



SPCC Plan Implementation



INITIAL AND ANNUAL TRAINING

- ☐ **Oil handling staff (40 CFR 112.7(f)(1))**
 - Includes employees engaged in the operation and maintenance of oil storage container or operation of equipment related to storage containers and emergency response personnel.
 - I.e. Facilities maintenance personnel, vehicle maintenance staff, cafeteria/food service employees, etc.

- ☐ **Designate a person (in writing) who is accountable for discharge prevention and who reports to facility management**

- ☐ **Review Plan, spill response, discharges, inspections**

- ☐ **Document all training!**



INITIAL AND ANNUAL TRAINING

APPENDIX E

Record of the Annual Discharge Prevention Briefing and Training

Briefings will be scheduled and conducted by the Roads Program Manager for oil-handling personnel at regular intervals to ensure adequate understanding of this SPCC Plan. The briefings will also highlight and describe past discharge events or failures, known malfunctioning components, if any, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Date	Subject(s) Covered	Employees in Attendance	Instructor(s)

MONTHLY INSPECTION

C-1: SPCC MONTHLY AST AND DRUM INSPECTION CHECKLIST

MAIN FACILITY GARAGE/PARKING AREA	ITEM CHECKED	NOTES
Condition of ASTs		
Secondary Containment		
Piping to/from ASTs and Pumps		
Evidence of Spill(s)		
Spill Kit Available		
Condition of Drums		
Condition of Mobile Tanks		
Condition of Tack Oil Distributor Truck		
Fire Ext. – Available/Serviceable		
First Aid Kit Available		

ANNUAL INSPECTION

C-2: ANNUAL FACILITY INSPECTION CHECKLIST

Drum Storage	Yes	No	Comments
Checked all container surfaces for signs of leakage?			
Are drums in good condition (no rusting, corrosion, etc.)?			
Are drums closed?			
Are the containment basins in good condition (no leaks, cracks, etc.)?			
Aboveground Storage Tanks	Yes	No	Comments
Checked tank surfaces for signs of leakage?			
Is the tank in good condition (no rusting, corrosion, pitting, etc.)?			
Is the tank foundation in good condition?			

INSPECTION TIPS

- ☐ Check all tanks and containers \geq 55-gallons
- ☐ Check gauges and vents
- ☐ Check space between double walls
- ☐ Check for cracks in concrete containment and container condition
- ☐ Clean up oil spills and close containers



INSPECTION FOLLOW-UP



ENSURE FACILITY HAS A
PROCESS TO FOLLOW UP ON
FINDINGS FROM INSPECTIONS



ENSURE CORRECTIVE ACTIONS
ARE TAKEN



DOCUMENT CORRECTIVE
ACTIONS TAKEN



EMERGENCY CONTACTS

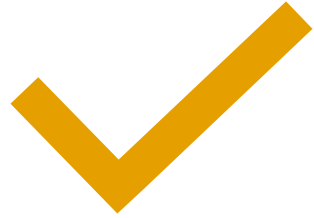
<u>EMERGENCY CONTACTS</u>			
BIA Road Shop "D" Street, Eagle Butte, South Dakota 57625			
NAME	TITLE	WORK	HOME/CELL

☐ Post in Shop

☐ Update as needed

Facility and Local/County/State/National Authorities Contact Information		
Title/Department	Contact	Phone Number

SPCC PLAN REVIEWS & FACILITY CHANGES



Annual

- Contacts and phone numbers
- Technical:
 - New tanks, removed tanks, tank locations (need P.E. certification, if required)
 - Updated within 6 months of major modifications



5-Year Review

- Signed by certified P.E., if required
- Containment, tanks, technical amendments



FACILITY CHANGES - PERMANENTLY CLOSED TANKS

Can remove permanently closed tanks from Plan only if:

- ✓ All liquid and sludge removed and properly disposed
- ✓ Connecting and piping lines disconnected and closed off
- ✓ Valves closed and locked (except ventilation)
- ✓ Sign with tank closure and date of closure posted



RECORDKEEPING

SPCC Plan → maintain on-site

Training records

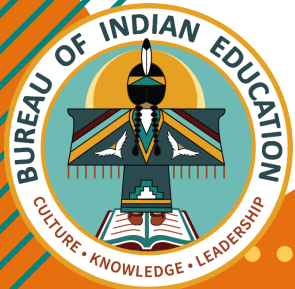
Inspections: Monthly and Annual

Plan Reviews: Annual and 5-year

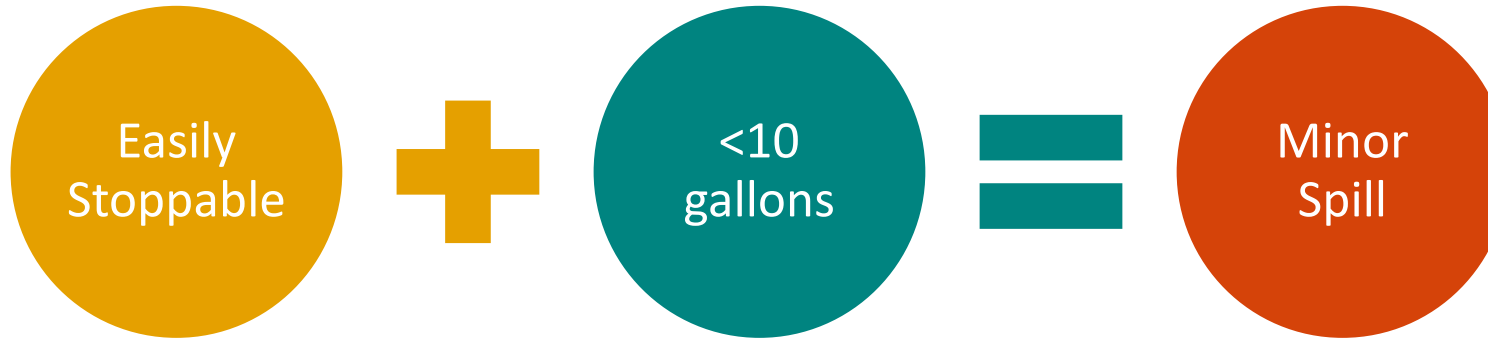
Discharge Notifications and spill records



Spill Response



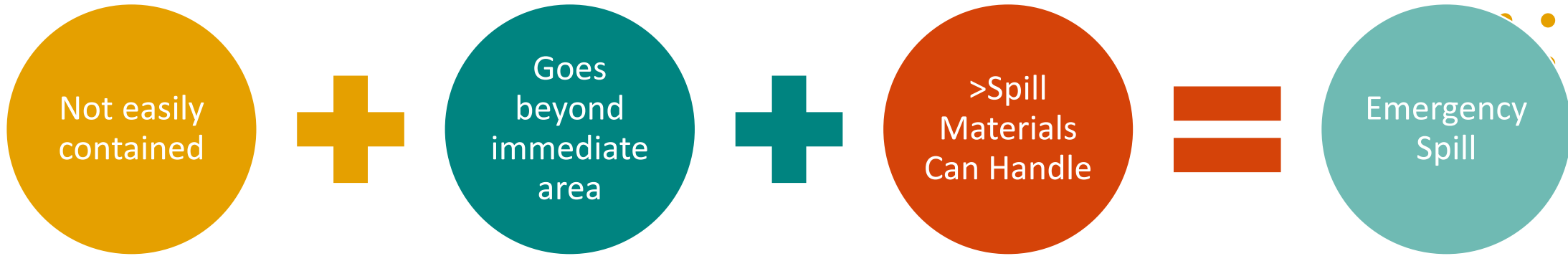
SPILL RESPONSE - MINOR



1. Notify Designated Representative + Identify Spill
2. Contain the Spill (if HAZWOPER Operations Level Trained)
3. Place contaminated waste and debris in properly labeled waste containers
4. Complete any form required by your SPCC Plan and/or Facility SOP and notify others, as needed



SPILL RESPONSE - EMERGENCY



1. Evacuate discharge site if necessary, depending on hazardous substance
2. Notify emergency personnel (911)
3. Notify SPCC Plan Designated Representative
4. Notify National Response Center if necessary
5. Notify cleanup contractor
6. Complete any form required by your SPCC Plan and/or Facility SOP and notify others, as needed



DISCHARGE NOTIFICATION

- **All Spills**
 - ✓ Notify Designated Representative and complete any notification forms required by your SPCC Plan
- **Any amount and affecting body of water**
 - ✓ All-of-the above
 - ✓ 911
 - ✓ National Response Center
 - ✓ Hazmat response



SPILL KITS

- ❑ Keep near oil storage
- ❑ Check supplies and restock frequently, especially after spills
 - ❑ Inventory at least annually as best management practice

Description of Item	Required Quantity	Available Quantity	Remarks
Main Facility Garage/ Parking Area			
18 x 18 inch Sorbent Pads	100	100	
17 x 17 inch Sorbent Pillows	25	25	
3 inch x 4ft Sorbent Socks	15	15	
3 inch x 8ft Sorbent Socks	10	10	
L pair Silver Shield Gloves	2	2	
L pair Nitrile Gloves	2	2	
XL Tychem Coverall	2	2	

SPILL KITS


- Absorbent pads
- Sorbent socks
- Absorbent pillows
- PPE (Gloves & goggles)



U.S. EPA NOTIFICATION

AGENCY NOTIFICATION STANDARD REPORT

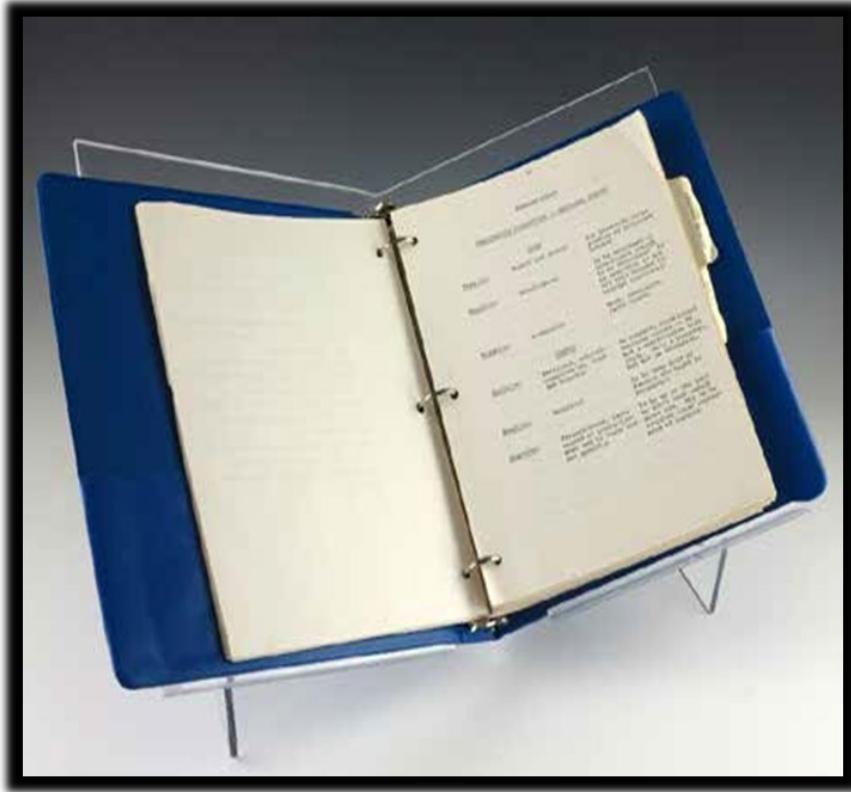
Information contained in this report, and any supporting documentation, must be submitted to the EPA Region 8 Regional Administrator, and to DENR, within 60 days of the qualifying discharge incident.

Facility	
Owner	
Operator	
Name of Person Filing Report	
Location	
Maximum Storage Capacity	
Daily Throughput	
Nature of Qualifying Incident(s)	
<input type="checkbox"/> Discharge to navigable waters or adjoining shorelines exceeding 1,000 gallons	
<input type="checkbox"/> Second discharge exceeding 42 gallons within a 12-month period. 	

SPCC Common Violations



SPCC COMMON VIOLATIONS



- Plan not developed
- Plan not signed
- Plan not implemented



SPCC COMMON VIOLATIONS



- Failure to conduct inspections and maintain storage tanks and containers
- Corrective actions not taken, e.g., cleaning up small leaks and spills
- Lack of secondary containment
- Improper storage and disposal of wastes from spill clean up activities, e.g., contaminated absorbents



SPCC COMMON VIOLATIONS



- SPCC plan not up to date
- Failure to keep the appropriate records
- Lack of training

Note: If a tank has not been properly closed out, requirements are still applicable even if the tanks are not in use.

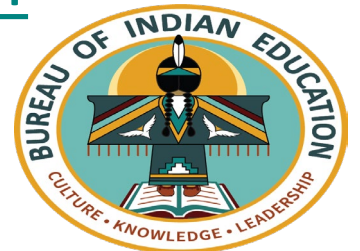




QUESTIONS?

RESOURCES

- EPA Overview of SPCC Regulation: [Overview of the Spill Prevention, Control, and Countermeasure \(SPCC\) Regulation | US EPA](#)
- EPA Tier I Facility Plan Template: [Spill Prevention, Control, and Countermeasure \(SPCC\) Tier I Qualified Facility Plan Template | US EPA](#)
- EPA SPCC Brochure: [spccbluebroch.pdf \(epa.gov\)](#)
- EPA SPCC Bulk Storage Inspection Fact Sheet: [bulk storage container integrity-testing-factsheet.pdf \(epa.gov\)](#)





BIE BEM PROGRAM CONTACTS

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Henryetta Price

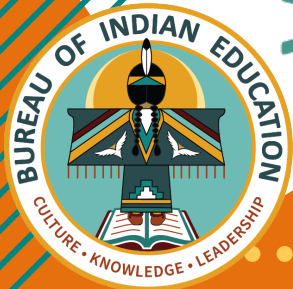
Environmental Protection
Specialist

SPCC and Storage Tank Lead

Albuquerque Office

Henryetta.Price@bie.edu





Mvto HiyHiy LemLmts Wado
DaWaEh Miigwech Wopila
Pinangigi Wimblahoho
Quyana Baasee AnaaBasee
Ahéhee HiriweTudahe
Pilamiya
Nya:Weh Aho
Thank You Tansi