

What's All This Talk About SPCC Plans

Since 1973 the federal Environmental Protection Agency (EPA) has used Spill Prevention, Control, and Countermeasure (SPCC) Plans as a cornerstone of its strategy to prevent oil spills from reaching our nation's waters. Owners and operators of aboveground storage tanks (ASTs) which store more than 1,320 gallons of oil must have and implement an SPCC Plan. Unlike oil spill contingency plans that address cleanup measures after a spill, SPCC Plans are preventive measures to assure that a spill from an AST is contained, and that countermeasures are established to prevent oil spills from reaching navigable waters. A spill contingency plan is required as part of the SPCC Plan if a facility is unable to provide secondary containment.

An SPCC Plan is unique to a facility, describing the site's AST locations, inventory, secondary containment, and protections established to prevent spills or releases. In some cases the plan must be certified by a professional engineer. All SPCC Plans must list whether or not a site complies with the rule under 40 CFR 112. Since 2002 amendments to the SPCC Rule in 2006, 2008, and 2009 have resulted in more facilities requiring SPCC plans (such as farms). The EPA periodically conducts on site inspections to ensure that facilities comply with the spill prevention regulations, and has the ability to levy fines if the SPCC Plan is not maintained and available at the facility.

What's the difference between the Federal SPCC and State APSA?

Here in California the State Regional Water Quality Control Board had jurisdiction over ASTs until recently. Assembly Bill (AB) 1130, effective January 1, 2008, established the California Aboveground Petroleum Storage Act (APSA). This bill transferred the authority from State Regional Water Quality Control Board to the Certified Unified Program Agencies (CUPAs) for the administration of the Federal SPCC Rule. Unlike the Federal SPCC Rule, the California APSA does not have an environmental threat threshold, but regulates only petroleum liquids. There are exemptions for certain facility types. However, if your facility has an aggregate storage capacity of 1,320 gallons or more of liquid petroleum you are subject to the State rule. It is, therefore, possible that your facility may be subject to one or both regulations.

Need SPCC Plan assistance?

Provost & Pritchard Consulting Group's environmental services has an in-depth understanding of the SPCC rules to assist our clients in meeting the Federal Regulations of 40 CFR Part 112, as well as the State of California's AB 1130. We offer both compliance consulting and document preparation to help our clients maneuver through the regulations cost-effectively.

For more information, contact Barbara Brandl at (559) 326-1100.