

The SPCC Rule for FARMERS



Barb Carr, SPCC Coordinator
US EPA, Region 5
312.886.7187 carr.barbara@epa.gov

Troy Swackhammer
US EPA, HQ OEM
202.564.1966 swackhammer.troy@epa.gov



1

Please note that this presentation is a summary and does not cover every SPCC provision

Always refer to the SPCC rule and official Agency guidance found at www.epa.gov/oilspill



2

Section 1.

SPCC Rule Applicability and Basics



3

Spill Prevention, Control and Countermeasure (SPCC) Rule Overview

- Authority from Clean Water Act
- Oil Pollution Prevention regulation codified at 40 CFR part 112
- Original rule effective in January 1974
- Non-delegable to other agencies



4

What is the SPCC Rule?

- Spill Prevention, Control, and Countermeasure rule
- Part of the Oil Pollution Prevention regulation (40 CFR part 112)
 - Includes requirements for Facility Response Plans (FRPs) for certain facilities which pose a greater threat to waterways and the environment
- Purpose – To develop plans designed to prevent oil discharges from reaching the navigable waters of the U.S. and adjoining shorelines



5

Requirements of the SPCC rule

- Requires certain facilities, including farms, to develop and implement a site-specific SPCC Plan to address:
 - Containment and procedures to *prevent* oil discharges;
 - Proactive *Control* measures to keep an oil discharge from entering navigable waters of the U.S. and adjoining shorelines (containment); and
 - Effective *Countermeasures* to contain, clean up, and mitigate any oil discharge that affects navigable waters of the U.S. and adjoining shorelines (spill response measures).



6

Rule Applies To Non-Transportation Related Facilities

Regulations apply to owners and operators of facilities involved in:

- Drilling
- Producing
- Gathering
- Storing
- Processing
- Refining
- Transferring
- Distributing
- Using
- Consuming



7

Examples of Transportation-Related Facilities

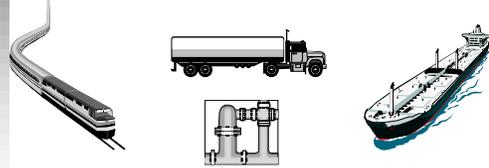


DOT - YES!

EPA - NO!



These facilities are subject to authority and control of U.S. Department of Transportation*



* Memorandum of understanding between secretary of transportation and Administrator of EPA Nov. 24, 1971. 36 FR 24080 and a summary is found in Appendix A of the SPCC rule



8

What are the SPCC criteria?

You must have an SPCC Plan if:

- Facility stores > 1,320 gallons of oil in aggregate above-ground storage or has 42,000 gallons of completely buried oil storage capacity; and
- Facility has a "reasonable expectation of an oil discharge" to waterway or adjoining shoreline.



9

SPCC Applicability

- Owner/operator makes the initial decision on applicability of SPCC regulations to the facility
 - Does the facility meet the applicability criteria (volumes of oil, expectation to spill to waterway)?
- No requirement to submit SPCC Plan to EPA for approval
- EPA does not formally "approve" or disapprove of SPCC Plan
- Plan is required upon inspection during regular workday



10

SPCC Applicability

Counted

55-gallons or greater



Not Counted

5-gallon container



30-gallon drum



Permanently Closed



11

Definitions - Oil

- Oil, as defined in Section 311 (a)(1) of the CWA, can be of any kind or in any form including, but not limited to
 - Petroleum and non-petroleum based oils
 - Crude Oil
 - Refined Products
 - Animal Fats, and
 - Vegetable oils



12

Examples of Oil on a Farm

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



* Milk and Milk product containers are now exempt from the SPCC capacity calculations and rule requirements



13

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

14

B. Amended/Clarified Definitions

Amended Definition of "Facility"

Facility means 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, oil gathering, oil processing, oil transfer, oil distribution, and oil waste treatment, or in which oil is used, 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 on the same site and types of activity at the site. Contiguous or non-contiguous buildings, properties, parcels, leases, structures, installations, pipes, or pipelines under the ownership or operation of the same person may be considered separate facilities. Only this definition governs whether a facility is subject to this part.



15

Definition of Facility...

- According to EPA guidance, the extent of a "facility" depends on site-specific circumstances:
 - Ownership, management, and operation of the buildings, structures, equipment, installations, pipes, or pipelines on the site;
 - Similarity in functions, operational characteristics, and types of activities occurring at the site;
 - Adjacency; or
 - Shared drainage pathways (e.g., same receiving water bodies).



16

B. Amended/Clarified Definitions

Amended Definition of "Facility"

- Clarifies that the definition of facility alone determines SPCC applicability.
- Clarifies that containers can be separated or aggregated, based on various factors in defining "facility"
 - The owner or operator has discretion in identifying which buildings, properties, parcels, leases, structures, installations, pipes, or pipelines make up the facility.
- Adds the terms "property," "parcel," and "lease" to the list of example terms that can be considered in determining facility boundaries.
- Clarifies that the term "waste treatment" refers to oil waste treatment.



17

Farm



Farm - A facility on a tract of land devoted to the production of crops or raising of animals, including fish, which produced and sold, or normally would have produced and sold, \$1,000 or more of agricultural products during a year.



18

Permanently Closed

- SPCC rule exempts any oil storage container that is permanently closed.
- *Permanently closed* means any container or facility for which:
 - (1) All liquid and sludge has been removed from each container and connecting line; and
 - (2) All connecting lines and piping have been disconnected from the container and blanked off, all valves (except for ventilation valves) have been closed and locked, and conspicuous signs have been posted on each container stating that it is permanently closed and noting the date of closure.



Permanently Closed (cont.)

- Definition of "permanently closed" does not require a container to be removed from a facility.
 - Permanently closed containers may be brought back into use as needed for variations in production rates and economic conditions.
- Permanent closure requirements under the SPCC rule are separate and distinct from the closure requirements in regulations promulgated under Subtitle C of RCRA.
- SPCC rule exempts any oil storage container that is permanently closed.
 - A tank that has either never stored oil, or has been permanently closed, and arrives at a facility is not counted until the tank is actually used to store oil.

Key SPCC Requirements

- Prepare Plan in accordance with Good Engineering Practices
- Full approval of management to implement Plan
 - and sign off
- Follow sequence of Section 112.7, or use a cross-reference section

SPCC Key Requirements

- SPCC regulations requires preparation and implementation of a written Plan to address:
 - Operating procedures for routine handling of products to prevent a discharge of oil
 - Discharge or drainage control measures to prevent a discharge of oil
 - Countermeasures to contain, clean up, and mitigate an oil spill
 - Methods of disposal of recovered materials
 - Contact list and phone numbers of company, contract response personnel, and National Response Center

Key SPCC Requirements

- For farms with >10,000 gallons of oil, Plans are required to be certified by a Professional Engineer (PE)
- For farms with > 1,320 up to 10,000 gallons of oil, can opt to self-certify SPCC Plans
 - Details to follow (Qualified Facilities)
 - This is optional alternative to PE certification
 - Two tiers of certification, Tier I and Tier II

Professional Engineer (PE)

- Certified by a licensed PE
 - Licensed in state or state with reciprocity
 - PE familiar with 40 CFR Part 112
 - PE or agent visited facility
 - In accordance with good engineering practices
 - Consider applicable industry standards
 - In compliance with regulations
 - Inspection and testing procedures are established
 - Plan is adequate for facility



Failure Analysis



- Where experience indicates reasonable potential for equipment failure
 - Tank loading or unloading equipment
 - Tank overflow, rupture, or leakage
 - Any other equipment known to be a source of a discharge
- Predict for each type:
 - Direction (e.g., north, or to the road)
 - Rate of flow
 - Total quantity of oil that could be discharged



25

Amendment of SPCC Plan by Owners or Operators

- For changes in facility design, construction, operation, or maintenance that materially affect the potential for a discharge as described in 112.1(b)
 - Commissioning and decommissioning containers
 - Replacement, reconstruction, or movement of containers
 - Reconstruction, replacement, or installation of piping systems
 - Construction or demolition that might alter secondary containment structures
 - Changes in product or service
 - Revision of operating or maintenance procedures
- Amend within 6 months; implement ASAP, but no later than 6 months after amendment



26

Plan Review



- Complete review and evaluation of Plan
 - Once every 5 years from the date facility becomes subject to the rule
 - If a facility was in operation on or before 8/16/2002, five years from the date of your last review required by the rule
 - Does not always require a PE
- Amend Plan within 6 months to include more effective prevention and control technology
- Implement ASAP, but no later than 6 months of amendment



27

Documenting Plan Review

- Must document Plan review and evaluation
- Sign statement at beginning or end of Plan or in a log or an appendix
 - “I have completed review and evaluation of the SPCC Plan for (name of facility) on (date), and will (will not) amend the Plan as a result.”
- PE must certify any technical amendment to Plan
 - Qualified Facilities exception



28

SPCC Rule Key Requirements

- SPCC Plan must be maintained at facility if manned 4 hours/per day or more, or at nearest field office if manned less than 4 hours/per day
- Allowance of usual and customary business records to serve as records of inspection or tests



29

General Secondary Containment

- Provide appropriate secondary containment and/or diversionary structures or equipment to prevent a discharge (from tanks, drums, totes, piping, etc.) to “navigable waters of the U.S. and adjoining shorelines”
- The entire system (walls and floor) must be capable of containing oil so that a discharge from containment will not occur until cleanup occurs
- §112.7(c)



30

General Secondary Containment

- One of the following preventive systems or its equivalent should be used as a minimum for onshore facilities:
 - Dikes, berms or retaining walls sufficiently impervious to contain spilled oil
 - Curbing or drip pans
 - Sumps and collection systems
 - Culverting, gutters or other drainage systems
 - Weirs, booms or other barriers
 - Spill diversion ponds
 - Retention ponds
 - Sorbent materials



31

General Secondary Containment

- “General” Secondary Containment requirement applies to the following examples:
 - Nurse tanks
 - Mobile refuelers
 - Oil-filled equipment (transformers, manufacturing equipment, etc.)
 - Transfer areas
 - Piping runs/racks, manifolds, etc.
 - Truck loading/unloading areas (not loading rack)
 - No specific-sized volume requirement
 - Sizing based on typical spill size not container size



32

Revision to General Secondary Containment Requirement

- Clarified that the general secondary containment requirement is intended to address the *most likely oil discharge* from any part of a facility
- Use of active and passive secondary containment, such as spill kits, allowed

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



33

Secondary Containment Active Measures

- Can use active measures as secondary containment
- Active measures are those that require deployment or a specific action by an operator
 - These may be deployed either before an activity involving the handling of oil starts, or in reaction to a discharge
- Must be implemented in time to prevent the spilled oil from reaching surface waters



34

Active Measures

- May be appropriate for discharges that occur during manned activities if they:
 - Can contain the volume and rate of oil
 - Is properly constructed
 - Is deployed in a timely manner
- Examples include:
 - Using spill kits in the event of a discharge
 - Placing a properly designed storm drain cover over a drain prior to a transfer of oil to a container



35

Specific Secondary Containment Requirements

- Specific minimum size requirement for secondary containment for:
 - Bulk storage containers
 - Mobile or portable bulk storage containers*
- The secondary containment must be sized to contain the largest single oil compartment or container plus “sufficient freeboard” to contain precipitation

* Certain mobile portable containers (tanker trucks and nurse tanks) are only required to have general secondary containment



36

Specific Secondary Containment

- For Bulk Storage containers, sized containment could be an earthen berm, concrete dike or earthen remote impoundment
 - See Chapter 4 of SPCC Guidance Document (Figures 4-5 and 4-6)
 - http://www.epa.gov/emergencies/docs/oil/spcc/guidance/4_SecondaryContainment_Impracticability.pdf
 - Sample Calculation Worksheets are also available on the EPA Website (for Qualified Facilities)



37

Bulk Storage Container Requirements

- No container should be used for the storage of oil unless its oil and construction are compatible with the oil stored and the conditions of storage, such as pressure and temperature, etc.
- For bulk storage tank installations, provide secondary containment for the entire capacity of the largest single container with sufficient freeboard for precipitation



38

Bulk Storage Containers

- Overfill Protection. Provide at least one of the following devices:
 - High liquid level alarms
 - High liquid level pump cutoff
 - Direct audible or code signal communication between container gauger and pumping station
 - Fast-response system for determining liquid level of each bulk storage container, with person present to monitor
 - Regularly test liquid level sensing devices (follow manufacturers specifications)



39

Facility Drainage

- Drainage from diked storage areas should be:
 - Restrained by valves or other positive means
 - Use valves that are *manual* and open-and-closed in design
 - Emptied by pumps or ejectors that are manually activated and inspected before starting to verify that no oil will be discharged into navigable waters of the U.S. and adjoining shorelines.



40

Facility Drainage (cont.)

- Drainage from undiked areas should flow into:
 - Ponds;
 - Lagoons; **or**
 - Catchment basins designed to retain oil or return it to the facility.
- Catchment basins should not be located in areas subject to periodic flooding
- If plant drainage is not engineered as above, the final discharge of all in-plant ditches should be equipped with a diversion system that could, in the event of an uncontrolled spill, return the oil to the plant



41

Tank Truck Loading/Unloading Rack

- Secondary Containment is required for a loading rack
- Must be sized to volume of the single largest compartment on tank truck
- Physical barrier system, wheel chocks, warning signs, etc. required
- Examination of the trucks lowermost drains, outlets
- Typically racks are not found at a farm



42

Loading/Unloading Areas

- If there is not a loading rack, but a loading area then 112.7(c) general containment is required (no specific size volume required)
- You determine amount most likely to be spilled, then provide secondary containment for that volume



Oil-Filled Operational Equipment

- Equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device
 - Not considered a bulk storage container
 - Does not include oil-filled manufacturing equipment
- Examples: hydraulic systems, lubricating systems, gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, other systems containing oil solely to enable the operation of the device



Facility Transfer (Piping) Operations

- Conduct regular inspections of all aboveground valves, piping, and appurtenances
- Assess general condition of items such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces
- Conduct integrity and leak testing of buried piping at time of installation, modification, construction, relocation, or replacement

Section 2.

Recent Rule Amendments Overview



SPCC Rule Compliance Dates for Farms

A Farm starting operation...	Must...
On or before August 16, 2002	Maintain its existing SPCC Plan Amend and implement the amended SPCC Plan no later than May 10, 2013
After August 16, 2002 through May 10, 2013	Prepare and implement an SPCC Plan no later than May 10, 2013
After May 10, 2013	Prepare and implement an SPCC Plan <i>before</i> beginning operations

Pesticide Application Equipment

- Exempt equipment includes:
 - Ground boom applicators
 - Airblast sprayers
 - Specialty aircraft that apply measured amounts of pesticides to crops and/or soil
 - Related mix containers
- Exemption applies to all pesticide application equipment and related mix containers, regardless of ownership or where used



Residential Heating Oil Containers

- Residential heating oil containers at single-family residences are exempt from the SPCC rule
- Applies to containers that are:
 - Aboveground or completely buried
 - Located at a farm or single-family residences
 - Used solely to store heating oil used to heat the residence
- SPCC requirements continue to apply to oil containers used to heat other non-residential buildings within a facility



49

Motive Power Containers

- Defined as any onboard storage containers used primarily to power the movement of a motor vehicle
- Includes self-propelled agricultural, construction, and excavation vehicles; and self-propelled cranes
- Oil transfer activities occurring within an SPCC-regulated facility continue to be regulated



50

Milk and Milk Product Container Exemption

- All milk and milk product containers, associated piping and appurtenances are exempt from the SPCC rule
- Excluded from facility oil storage capacity calculation when determining SPCC applicability
- Exemption also includes all milk handling and transfer activities
- Milk product examples include cheese, yogurt and ice cream
- Does not impact the potential liability of milk spills



Immediately report milk and other oil spills to navigable waters or adjoining shorelines to the National Response Center (NRC) at 800-424-8802 or 202-426-2675



51

Farm Nurse Tanks Preamble Clarification

- Nurse tanks are mobile/portable containers used at farms to store and transport fuel for transfers to or from farm equipment and to other bulk storage containers
- The definition of "mobile refueler" includes nurse tanks, as well as non-road licensed refueling equipment that are used to refuel farm equipment in the fields
- Nurse tanks are excluded from sized secondary containment
- Must meet general secondary containment requirements at §112.7(c)- design for "most likely" spill (e.g. spill kits may be adequate)
- Identify the "home base" in Plan



52

Security Requirements

- 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.



53

Manmade Structures: Preamble Clarification

- Certain manmade features may be taken into consideration in determining how to comply with SPCC requirements
- SPCC Plan preparer can consider:
 - The ability of building walls and/or drainage systems to serve as secondary containment for a container
 - Freeboard for precipitation not necessary if container is indoors
 - Indoor conditions that reduce external corrosion and potential for discharges, to develop a site-specific integrity testing and inspection program



54

Inspections, Tests, and Records

- Conduct inspections and tests in accordance with written procedures developed by the facility or by the engineer who certifies the facility Plan
- Keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years



55

Inspections and Integrity Testing

- SPCC rule requires routine inspections and tank integrity testing
- 2008 amendments provides flexibility in complying with bulk storage container (tanks, drums and totes) inspection and integrity testing requirements



Proposed changes at:
112.8(c)(6)
and
112.12(c)(6)



56

Inspections and Integrity Testing

- 2008 amendments and flexibility:
 - Requires an owner or operator to consult and rely on industry standards to determine the appropriate qualifications for tank inspectors/testing personnel and the type/frequency of integrity testing required for a particular container size and configuration
 - Enables facilities to easily adjust Plans to reflect changes in industry standards
 - Example industry standards: American Petroleum Institute (API) 653 (www.api.org)
 - Steel Tank Institute SP001 (www.steeltank.com)

Proposed changes at:
112.8(c)(6)
and
112.12(c)(6)



57

Summary of Inspection Requirements

- Drums and totes (portable containers): Periodic visual inspections, as long as sized secondary containment provided; typically monthly, can be weekly, etc.
- Tanks: Periodic visual inspections by the owner/operator plus formal inspections based on the industry integrity testing standard that is used. Visual inspections are typically performed monthly, can be weekly, etc.
- Piping: Periodic visual inspections by the owner/operator, typically monthly, can be weekly, etc.
- Fuel transfer areas: Visual inspections by the owner/operator during transfers, typically monthly, can be weekly, etc.



58

Training

- Train oil-handling personnel
 - Operation/maintenance of prevention equipment
 - Discharge procedure protocols
 - Applicable pollution control laws, rules, and regulations
 - General facility operations
 - Contents of the facility SPCC Plan
- Designate person accountable for discharge prevention and who reports to facility management
- Schedule/conduct at least one briefing/year:
 - Known discharges and failures, malfunctioning components, new precautionary measures



59

Qualified Facilities – An Overview

- A qualified facility is a smaller oil storage facility that is eligible for streamlined regulatory requirements
 - Self-certified SPCC Plan instead of one reviewed and certified by a Professional Engineer
- Must meet eligibility criteria
- This group of facilities divided into two tiers
 - Tier I - complete a self-certified SPCC Plan following a template
 - Tier II - prepare and self-certify an SPCC Plan



60

Qualified Facilities Eligibility Criterion #1: Storage Capacity

- Facility must have **10,000 gallons or less** in aggregate aboveground oil storage capacity
- If the facility capacity increases above 10,000 gallons, then a PE must certify the Plan within 6 months of capacity change



61

Qualified Facilities Eligibility Criterion #2: Reportable Discharge History

- For the 3 years prior to Plan certification, or since becoming subject to the rule if it has operated for less than 3 years, the facility must not have had:
 - A single discharge of oil to navigable waters of the U.S. and adjoining shorelines exceeding 1,000 U.S. gallons; or
 - Two discharges of oil to navigable waters or adjoining shorelines each exceeding 42 U.S. gallons within any 12-month period.

The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters of the U.S. and adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for the purposes of this reporting requirement.



62

Tier I Eligibility Criteria

- 10,000 gallons maximum facility aboveground oil storage capacity;
- In the 3 years prior to Plan certification, no spills to navigable waters of the U.S. and adjoining shorelines: greater than 1,000 gallons or no two spills greater than 42 gallons in a 12-month period; and
- Have **NO** oil storage containers with an individual aboveground storage capacity greater than 5,000 U.S. gallons



63

Tier II Eligibility Criteria

- 10,000 gallons maximum facility aboveground oil storage capacity;
- In the 3 years prior to Plan certification, no spills to navigable waters of the U.S. and adjoining shorelines: greater than 1,000 gallons or no two spills greater than 42 gallons in a 12-month period; and
- Have an oil storage container with an aboveground storage capacity greater than 5,000 U.S. gallons



64

Qualified Facilities Self-Certification

- Facilities that meet the eligibility criteria are able to prepare and self-certify an SPCC Plan as Tier II qualified facilities
- Self-certified SPCC Plans must follow the rule requirements
 - Cannot deviate from rule requirements UNLESS
 - A PE certifies the environmentally equivalent alternative and/or contingency plan substituting for secondary containment ("hybrid Plan"- Tier II facilities only)



NOTE: Some states require a PE to certify SPCC Plans

65

Self-Certification Attestation

- Owner/operator certifies that:
 - The Plan has been prepared in accordance with accepted and sound industry practices and standards and with the rule requirements
 - Procedures for required inspections and testing have been established
 - The Plan is being fully implemented
 - The facility meets the qualifying criteria
 - The Plan does not deviate from rule requirements except as allowed and as certified by a PE
 - Management approves the Plan and has committed resources to implement it



66

Tier I Template

Available at:
<http://www.epa.gov/oswer/e1/content/spcc/tier1temp.htm>



67

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



68

Ver. 1-E-000-3-18-10

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 Doers Family Farm
 Facility Address 2024 South Buurkle 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 Buurkle Street
 City Stuttgart State AR ZIP 72160-6508
 County Arkansas Tel. Number (870) 163 - 1651



69

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(i)(1) 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 equivalency) and §112.7(d) (impairability of secondary containment) or include any measures pursuant to §112.9(c)(2) 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.

II. Plan Requirements

1. Oil Storage Containers (§112.7(a)(3)(i))

Oil Storage Container (A) or Contingency Tank (B)	Type of Oil	Shell Capacity (gallons)
A - Horizontal, single wall, cylindrical 11'-142 steel tank #1 on concrete pad and pad	Diesel, on-road	2,500
A - Horizontal, single wall, cylindrical 11'-142 steel tank #2 on concrete pad and pad	Diesel, on-road	2,500
A - Horizontal, single wall, cylindrical 11'-142 steel tank #3 on concrete pad and pad	Gasoline	500
A - Vertical, single wall, cylindrical 11'-142 steel tank #4 on ground	Slop oil	1,200
A - Steel tank mounted on trailer	Diesel, off-road	500
A - Steel tank mounted on pickup truck	Diesel, on-road	115
A - Polyethylene tube #1 (single use)	Motor oil	250
A - Polyethylene tube #2 (single use)	Waste oil	250
A - Steel drum #1 (single use)	Hydraulic oil	55
A - Steel drum #2 (single use)	Lubrication oil	55
A - Steel drum for adjuvant oil	Adjuvant oil	55
B - Horizontal, single wall, cylindrical 11', 60 steel 11ST	Gasoline	500

Total Aboveground Storage Capacity 7980 gallons
Total Completely Buried Storage Capacity 500 gallons
Facility Total Oil Storage Capacity 3480 gallons

¹ Aboveground storage containers that are not included when calculating total facility oil storage capacity include: tanks and mobile or portable containers of filled operational equipment (e.g., transformers); other oil filled equipment, such as flow-through process equipment; empty 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 diked containers; inactive process containers; hot mix asphalt containers; heating oil containers used only at a single family residence; and pesticide application equipment or related mix containers.

² Although the volume 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.

³ Counts toward qualified facility applicability threshold.

Table 3-4 Containers with Potential for an Oil Discharge

Area	Type of failure (discharge scenario)	Potential discharge volume (gallons)	Direction of flow for uncontained discharge	Secondary containment method ¹	Secondary containment capacity (gallons)
BUK Storage Containers and Mobile/Portable Containers					
2,600 gal off road diesel tank	Tank overflow, fitting leak, seam failure	10 - 2,600	South East	Concrete pad and earthen berm	6,732
2,500 gal on road diesel tank	Tank overflow, fitting leak, seam failure	10 - 2,500	South East	Concrete pad and earthen berm	6,732
500 gal gasoline tank	Tank overflow, fitting leak, seam failure	10 - 500	South East	Concrete pad and earthen berm	6,732
1,200 gal slop oil tank	Tank overflow, fitting leak, seam failure	1 - 1,200	South East	Further berms	9,114
150 gal off road diesel tank on trailer	Tank overflow or fitting leak	-	Federal	Soil kit	Absorbs up to 25
115 gal on-road diesel tank on pickup truck	Tank overflow or fitting leak	-	Federal	Soil kit	Absorbs up to 25
250 gal motor oil tote (inside shop)	Fitting leak	< 1	Federal	Soil containment pallet	300
250 gal waste oil tote (inside shop)	Tank overflow	< 1	Federal	Soil containment pallet	300
55 gal hydraulic oil drum (inside shop)	Fitting leak	< 1	Federal	Soil containment pallet	56
55 gal kerosene oil drum (inside shop)	Fitting leak	< 1	Federal	Soil containment pallet	56
55 gal adjuvant oil drum (inside a shed)	Fitting leak	< 1	Federal	Soil containment pallet	56
500 gal gasoline 11ST ²	Tank overflow	2.5 - 15	South East	Double wall	> 500
Oil Field Operational Equipment (e.g., hydraulic equipment, transformers)³					
None					
Spillage Volume, etc.					
Aboveground piping between diesel and gasoline tanks and dispensers	Fitting leak or failure	1	South East	Concrete pad and earthen berm	6,732
Buried piping between gasoline UET and dispenser	Fitting leak or failure	1	Federal below ground	double wall buried piping	Double wall
Motor, hydraulic, substitution, and solvent oil dispensing hoses	Fitting leak or failure, hose failure	< 1	Federal	Soil kit	Absorbs up to 25
Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment)	Receiving tank overflow, fitting leak or failure, fuel transfer hose failure	1 - 15	South East	Soil kit	Absorbs up to 25
Diesel and gasoline fuel transfer area	Receiving tank overflow, fitting leak or failure, fuel transfer hose failure	1 - 15	South East	Soil kit	Absorbs up to 25
Refueling areas at the personal vehicle gasoline dispenser and 11ST and in the field near equipment	Receiving tank overflow, fitting leak or failure	1 - 15	Federal or South East	Soil kit	Absorbs up to 25
Other Oil Handling Area or Oil Filled Equipment (e.g., flow-through process vessels at an oil production facility)					
None					

¹ Use the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing (3) Covering, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill containment ponds; (6) Helebar ponds; or (7) Sorbent materials.

² 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.

³ For oil field operational equipment, document in the table above if alternative measures to secondary containment (as described in § 112.7(h)) are implemented at the facility.

This log is intended to document compliance with §§ 112.6(a)(3)(B), 112.6(b)(3), 112.6(d)(4), 112.9(D)(2), 112.9(D)(3), 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?
	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 #3 220-gal. motor oil and waste oil dies. 55-gal. steel hydraulic, lubrication, and solvent oil drums Trailer-mounted Fuel nurse tank Pickup truck fuel nurse tank	Visual inspections (STI SPCC), Standard for the inspection of Aboveground Storage Tanks			<input type="checkbox"/>
	UST 600-gal. gasoline tank	Hydrostatic test at least every 5 years and monthly tank gauging 100 CFH per API and API Department of Environmental Regulation 121 Storage Tanks			<input type="checkbox"/>

	Secondary containment sash berm	Weekly visual inspections and other heavy use/traffic			<input type="checkbox"/>
	Container liquid level gauges	Tests and Inspections following manufacturer's procedures			<input type="checkbox"/>
	Dispensers	Inspections (manufacturer and installer instructions)			<input type="checkbox"/>

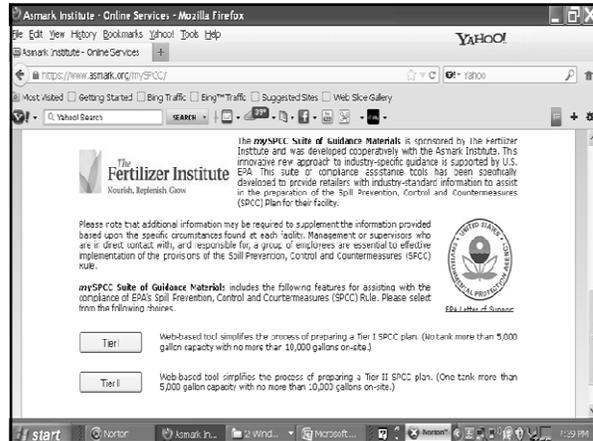
Indicate in the table above if records of facility inspections are maintained separately at the facility.

Contact Organization - Person	Telephone Number
National Response Center (NRC) Cleanup (202)855-5100	7610-42-6900
WV Company (Waste Oil Disposal Contractor)	870-555-8030
Key Facility Personnel	
Operational Person/Responsible for Emergency Prevention James Johnson, Production Manager	Office: 870-555-1851 Emergency: 760-400-1000 (cell phone)
	Office: Emergency: Office: Emergency:
State Oil Pollution Control Agencies	
Department of Emergency Management (ADEM) Ark Department of Environmental Quality (ADEQ) Coal State Police; and OCSA Agencies EPA Region VI	1-800-302-4012 Office: 214-484-6701 Emergency: 1-866-373-7745
Arkansas County Office of Emergency Management	870-873-3730
Local Fire Department	911
Local Police Department	911
Hospital	
Memphis General Hospital - 1221 Franklin Blvd., Rutledge, AR 72960-3000	870-555-1112
Other Contact Information (e.g., downstream water intakes or neighboring facilities)	
Steven T. Barney, Balm Dairy Farm	870-555-6110 (Office)
Sharon Fields, Fields Farm	870-555-0099 (Office); 870-555-4107 (Cell)

Another SPCC Plan Preparation Option

- EPA partnered with Asmark Institute and The Fertilizer Institute to create an on-line, fill-in-the-blank tool for preparation of self-certified plans.
- Tier I and Tier II plans can be prepared by the farmer.
- See: <https://www.asmark.org/mySPCC/>

EPA



Plan Requirements for Farms with >10,000 gallons of oil

- SPCC Plan must be certified by a Professional Engineer (PE)
- State PE licensing boards typically require PE's to have expertise in area of practice in order to "stamp" plans and construction documents
- Plan must include PE attestation
- PE's should not use Tier I template to complete SPCC Plan
 - Plan must follow rule requirements in 40 CFR parts 112.7 and 112.8.



79

Section 4.

Additional Information



80

Outreach Tools

- SPCC farm factsheets and blank Tier I template on EPA's oil website:
 - <http://www.epa.gov/emergencies/content/spcc/index.htm>
- General SPCC Blue Book on website also
- Example Tier I template for farms
- Asmark Institute mySPCC guidance tools
- **HOTLINE:** Superfund, TRI, EPCRA, RMP, and Oil Information Center (800) 424-9346



81

SPCC Blue Book

- Available at:
<http://www.epa.gov/oem/docs/oil/spcc/spccbluebroch.pdf>



82

Reporting of Oil Spills

- Report all oil discharges to navigable waters of the U.S. and adjoining shorelines to NRC at 1-800-424-8802
- Federal government's centralized reporting center, which is staffed 24 hours a day by U.S. Coast Guard personnel
- Any person in charge of a vessel or an onshore or offshore facility must notify NRC immediately after he or she has knowledge of the discharge
- NRC relays information to EPA or U.S. Coast Guard depending on the location of the incident
- An On-Scene Coordinator evaluates the situation and decides if federal emergency response action is necessary



83

Specific SPCC Spill Reporting Requirements

- Report to the EPA Regional Administrator (RA) when there is a discharge of:
 - More than 1,000 U.S. gallons of oil in a single discharge to navigable waters of the U.S. and adjoining shorelines
 - More than 42 U.S. gallons of oil in each of two discharges to navigable waters of the U.S. and adjoining shorelines within a 12-month period
 - When making this determination it is the amount of the discharge in gallons that reaches navigable waters of the U.S. and adjoining shorelines
 - An owner/operator must report the discharge(s) to the EPA Regional Administrator within 60 days



84

For More Information

- EPA's SPCC web page
 - <http://www.epa.gov/emergencies/content/spcc/index.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



85

SPCC Contacts

REGION	SPCC COORDINATORS	AG CONTACTS
1 CT, RI, MA, NH, VT, ME	Alex Sherrin sherrin.alex@epa.gov (617) 918-1252	Rob Koethe koethe.robert@epa.gov (617) 918-1535 Andrea Salyani szalyani.andrea@epa.gov (617) 918-1198
2 NJ, NY, PR, VI	Larry D'Andrea dandrea.larry@epa.gov (732) 906-6964	Kristina Heinemann Heinemann.kristina@epa.gov (212) 637-3857
3 PA, WV, VA, MD, DC	Arlin Galarza-Hernandez galarza-hernandez.arlin@epa.gov (215) 814-3223	John Butler Butler.john@epa.gov (215) 814-2127
4 KY, NC, TN, SC, MS, AL, GA, FL	Ted Walden walden.ted@epa.gov (404) 562-8752	Denise Tennessee Tennessee.denise@epa.gov (404) 562-8460
5 MN, WI, MI, IL, IN, OH	Barb Carr Carr.barbara@epa.gov (312)886-7187	Tom Davenport davenport.thomas@epa.gov (312) 886-0209 Gerald Winn winn.gerald@epa.gov (312) 886-2777
6 NM, TX, OK, AR, LA	Don Smith smith.donald@epa.gov (214) 665-6489 Chris Perry perry.chris@epa.gov (214) 665-6702	Randy Rush rush.randall@epa.gov (214) 665-7107
7 NE, KS, IA, MO	Alan Hancock hancock.alan@epa.gov (913) 551-7647	Karen Flournoy flournoy.karen@epa.gov (913) 551-7782 Damon Fritzel fritzel.damon@epa.gov (913) 551-7560 Heather Duncan duncan.heather@epa.gov (913) 551-7640



86

SPCC Contacts (cont.)

REGION	SPCC COORDINATORS	AG CONTACTS
8 MT, ND, SD, WY, UT, CO	Melissa Payan payan.melissa@epa.gov (303) 312-6511	Jennifer Meints meints.jennifer@epa.gov (303) 312-6334
9 CA, NV, AZ, HI, Guam, American Samoa, Northern Mariana Islands	Pete Reich reich.peter@epa.gov (415) 972-3052 Janice Witul witul.janice@epa.gov (415) 972-3089	Korry Drake Drake.korry@epa.gov (415) 947-4157 Don Hodge hodge.don@epa.gov (415) 972-3240
10 WA, OR, ID, AK	WA: Mike Sibley sibley.michael@epa.gov (206) 553-1886 OR, ID: Richard Franklin franklin.richard@epa.gov (503) 326-2917 AK: Matt Carr carr.matthew@epa.gov (907) 271-3616	Karma Anderson anderson.karma@epa.gov (206) 553-1647
HQ- Office of Emergency Management:	Mark Howard howard.mark@epa.gov (202) 564-1964 Patricia Giffre giffre.patricia@epa.gov (202) 564-1972 Troy Swackhammer swackhammer.troy@epa.gov (202) 564-1966	Ag Center: Ginah Mortensen mortensen.ginah@epa.gov (913) 551-5028 Carol Galloway galloway.carol@epa.gov (913) 551-5092
HQ- Office of Civil Enforcement:	David Drelich drelich.david@epa.gov (202) 564-2949 Kelly Brantner brantner.kelly@epa.gov (202) 564-9933	
HQ- Office of Compliance:	Dan Chadwick chadwick.dan@epa.gov (202) 564-7054	



87

Questions?



88