



The National Park Service EnviroFact Sheet

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Spill Prevention, Control and Countermeasure (SPCC) Plans (G-8) DRAFT

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SPCC Plans must specify measures a park will take to prevent and control oil spills, including spills resulting from human operational error or equipment failures.

Under the Clean Water Act, "oil" means any oil of any kind or in any form. Oil falls into the following categories: crude oil and refined petroleum products, edible animal and vegetable oil, other oils of animal and vegetable origin, and other non-petroleum oils.

A facility is required to develop and implement an SPCC Plan if, due to its location, the facility could reasonably be expected to discharge oil into "navigable waters" of the U.S. and have a total aboveground oil storage capacity greater than 1,320 gallons in *all* storage tanks at the facility. Storage tanks that must be counted towards the total capacity and included in the determination include:

- Any aboveground storage tank (AST) or container;
- Any partially buried tank; and
- Any container that is used for standby storage, for seasonal storage, for temporary storage, or not otherwise "permanently closed."

A plan is also required if underground oil storage exceeds 42,000 gallons.

Exempt from SPCC planning requirements (and therefore, not counted in the total oil storage capacity determination) are:

- Underground storage tanks (USTs) already regulated under 40 CFR 280 or 281; and
- Oil storage containers that have a capacity of less than 55 gallons.

FOR MORE INFO...

EPA Oil Program web page:
<http://epa.gov/oilspill/>

APPLICABLE REGULATIONS

In 2002, EPA issued a final rule amending the SPCC regulations at 40 CFR 112 that created new requirements for the development of SPCC Plans. EPA has extended the deadlines by which facilities must amend and implement their revised SPCC Plans. A facility in operation from before August 16, 2002 through October 31, 2007 must maintain its SPCC Plan, but amend it, if necessary to ensure compliance, and implement the amended Plan on or before October 31, 2007. **This EnviroFact Sheet addresses the latest SPCC rule. If your park currently has an SPCC Plan, review the SPCC rule to determine if it is compliant with the most recent requirements.**

DEFINING A "FACILITY"

In determining the SPCC Planning requirements at a park, you must consider the oil storage capacity at the *entire park*. Since NPS units are federal facilities, the definition of a "facility" is interpreted more broadly than facilities in the private sector. At a park, the *facility* boundary will include all areas within the park, potentially including park residential units (dependent upon EPA regional interpretation). Therefore, if a park has a 1,000-gallon heating oil AST at the visitor center and two 275-gallon ASTs in the basement of park residences, the park may need an SPCC Plan.

SPCC PLAN CONTENTS

An SPCC Plan must clearly define the following three elements:

- Operating procedures that **prevent** oil spills,
- **Control** measures installed to prevent a spill from reaching navigable waters, and
- **Countermeasures** to contain, cleanup, and mitigate the effects of an oil spill that reaches navigable waters.

Additional detail about required SPCC Plan content is included in checklist item 3 on the next page of this EnviroFact Sheet.

REPORTING AND RECORDKEEPING

SPCC Plans do not have to be submitted to EPA. However, EPA requires facilities to submit their SPCC Plans for review after having two discharges of over 42 gallons in any 12-month period. A Park's SPCC Plan must be available on-site (e.g., Headquarters) for review and inspection during normal working hours. If the park is normally attended for at least four hours per day, a copy of the entire SPCC Plan must be kept on-site.

The SPCC Coordinator is responsible for maintaining specific tank maintenance records. For details, see checklist item 5.

Amending the SPCC Plan

Park personnel must review the Plan at least every five years, and amend it within six months of the review. Amendments to the plan must include more effective prevention and control technology if such technology will significantly reduce the likelihood of a discharge and has been field-proven at the time the review is required.

A Professional Engineer must certify any *technical* amendments but does not need to certify *non-technical* amendments (i.e., changes to phone numbers or names of park staff). Park staff must document completion of the review and evaluation, and must sign a statement regarding whether the Plan will be amended.

TRAINING

Park staff who are required to respond to oil spills, or could reasonably be expected to witness and report a spill, must receive training on the contents of the Plan and its attachments at least once a year. This training should ensure that the Park staff members have an adequate understanding of their responsibilities with respect to implementation of the Plan. In addition to a review of spill prevention, containment, and cleanup methods, the training should highlight any past spill events or failures and recently developed precautionary measures. Staff responding defensively to an oil spill must receive HAZWOPER First Responder operations level training.

SPCC PLAN COMPLIANCE CHECKLIST

Checklist Items	Notes
1. Ensure that an inventory of all oil storage tanks (both above and underground) has been developed. The inventory should indicate tank size, type, location and the type of oil contained. Ensure that the inventory was used to evaluate the applicability of SPCC Planning requirements at the park.	
2. Determine whether your state has an authorized underground storage tank management program under 40 CFR 281. Ensure that state regulations have been reviewed to determine which containers would be exempt from SPCC Planning requirements due to their inclusion under the state program.	
<p>3. If it is determined that an SPCC Plan is required, or if a Plan is already in place, ensure that the Plan includes the following:</p> <ul style="list-style-type: none"> • A prediction of the direction, rate of flow, and total quantity of oil that could be discharged where experience indicates a potential for equipment failure (including oil delivery trucks); • A description of containment and/or diversionary structures or equipment to prevent discharged oil from reaching navigable waters (where permanent containment cannot be erected, a description should be provided of sorbent materials that will be used for containment); • For each tank, the following information should be included: <ul style="list-style-type: none"> ○ Construction and location of tank; ○ Overfill prevention; ○ Leak detection; ○ Description of piping; ○ Spill catchment basins; and ○ Fire protection measures (breakaway devices, emergency shut-offs, etc.) • Where appropriate, a demonstration that containment and/or diversionary structures or equipment are not practical, and a strong oil spill contingency plan including a written commitment of manpower, equipment and materials to quickly control and remove spilled oil; • A discussion of the spill prevention and control measures applicable to the facility and/or its operations; • A demonstration of management's approval; and • Certification by a registered professional engineer. 	
4. Ensure that an SPCC Coordinator has been designated to implement the Plan.	
<p>5. Ensure that the SPCC Coordinator maintains the following records, where applicable:</p> <ul style="list-style-type: none"> • A corrosion expert's analysis of site corrosion potential if corrosion protection equipment is not used; • Documentation of operation of corrosion protection equipment; • Documentation of UST system repairs; • Compliance with release detection requirements; and • Results of the site investigation conducted at permanent closure of a UST. 	
6. Ensure that a copy of the Plan is available for inspection on-site.	
7. Ensure that all park staff with oil-handling responsibilities have been properly trained.	
8. Ensure that procedures are in place to review the plan every five years.	

