**EPA Names Most Common SPCC Errors – Do You Have Any of These?**

EPA recently reviewed inspection data from its regional offices to get an idea of what errors were being found in [SPCC (Spill Prevention, Control and Countermeasures) Plans](https://isienvironmental.com/spcc-plan-blog/). The goal of the review was to help EPA determine how clear their rules were to help companies comply with the regulations.

The data was reviewed for companies who had SPCC Plan issues, with a preference for companies with higher oil storage capacity and who also had to have Facility Response Plans (FRPs) onsite as well. Inspection data was reviewed for 120 companies with oil storage capacity between 4,000 gallons and 857,000,000 gallons.

Of those, 10 companies didn’t have an SPCC Plan. Of the remaining, they found the companies averaged 4 issues with their plans.

**Top 9 Deficiencies of the Standard (in Order)**

* Plan Content, Certifications & Reviews (112.3, 112.5, 112.7) – 119 of the 120 had this deficiency
* General Secondary Containment (112.7)
* Testing and Inspection: Integrity Testing (112.8, 112.12)
* Sized Secondary Containment (112.8, 112.9, 112.12)
* Drainage (112.8)
* Piping: General (112.8)
* Piping: Inspections (112.8, 112.9)
* Discharge Prediction (112.7)
* PE Certification (112.3)

Some examples of these include:

* Inadequate or no documentation of the required 5-year review of the plan;
* Failure to address required containment for piping;
* Failure to address integrity testing of bulk storage containers;
* Failure to demonstrate that secondary containment met the requisite size of design requirements; and,
* Failure to provide procedures for controlling stormwater discharges from diked areas.

Do you have these issues with your own SPCC plan? Are you required to have an SPCC Plan? Check out [our blog about SPCC plans](https://isienvironmental.com/spcc-plan-blog/), or contact us today to help. We can review your plan for compliance to these issues, conduct the required 5-year update, or provide the required training you need to conduct to your employees. Contact us today!