If your company uses or stores large quantities of oil, you may be subject to EPA’s Spill Prevention, Control and Countermeasures, or SPCC regulation and be required to have a plan to prevent discharges of that oil into navigable waters.

**Who Needs to Comply with SPCC?**

SPCC regulations cover all types of oils, including petroleum, fuel oil, sludge, vegetable oils, mineral oils and synthetic oils. If your facility has the capacity aboveground of 1,320 gallons or more or underground capacity of 42,000 gallons or more, you quality for this regulation.

To count capacity, you add together everything that can store 55 gallons or more of petroleum. This includes drums, totes, tanks, or any other storage vessel. Also included in the total is the capacity from equipment such as hydraulic systems, lubricating systems, gear boxes, coolant systems, heat transfer and transformers, circuit breakers and electrical switches.

Thus, all types of industries are included within this regulation, including, but not limited to:

* Industrial and Commercial Facilities Using or Storing Oil
* Oil Exploration and Production,
* Refining and Storage
* Airports
* Marinas
* Power Transmission, Generation and Distribution
* Construction
* Waste Treatment

**What’s the Purpose of SPCC?**

SPCC planning is the practices, procedures, structures, and equipment used at the facility to prevent spills from reaching and contaminating navigable waters. Most facilities will discharge to navigable waters because this often includes ditches, storm sewers, and other drainage systems that can lead to streams, creeks and other bodies of water.

SPCC planning includes three basic functions: 1) practices devoted to the prevention of spills, 2) planning for containments should a spill occur, and 3) removal, cleanup, and disposal of spilled materials. These basic functions are incorporated into the SPCC Plan.

**What’s Included in an SPCC Plan?**

A SPCC Plan has several required elements, including:

* Petroleum-related chemical quantities and locations;
* Release prevention structures;
* Release prevention procedures;
* Procedures in place to respond to a spill, should it occur;
* Equipment used to prevent or respond to a spill;
* Key personnel;
* Training programs;
* Spill history; and,
* Certification.

In most cases, the certification of the SPCC Plan needs to be completed by a professional engineer.

**Compliance Deadlines**

If you make changes to your facility, such as adding containers, secondary containment structures, or installation of piping, you must update your SPCC Plan within six months of the change.

You must also review your SPCC Plan every 5 years and make changes accordingly.

**Where Do You Send the SPCC Plan?**

Unless you’re asked for it, your plan stays onsite and is not required to be submitted to EPA or your state office. Some states do have SPCC requirements in addition to the EPA requirements. EPA says that if the facility the SPCC Plan covers is staffed at least 4 hours per day, the Plan needs to be maintained there. If the facility is not staffed 4 hours per day, then it can be maintained at the nearest field office.

##

Do you need an SPCC Plan? If you have one, when was the last time it was reviewed? iSi has worked with hundreds of plans and we’d like to help. Contact us today!