Spill Prevention, Control and Countermeasure (SPCC) Plan Training

YORK COLLEGE
THE CITY UNIVERSITY OF NEW YORK

O'BRIEN & GERE
ENGINEERS, INC.

York College SPCC Plan Training Program

- What is the USEPA's Oil Pollution Prevention Regulation?
- What do the regulations require York College to do?
- What is an SPCC plan?
- What is the purpose of an SPCC plan?
- Who needs to have an SPCC plan?
- Definitions

York College SPCC Plan Training Program

- Why does York College need an SPCC plan?
- York College's SPCC plan
- Why are you required to receive SPCC plan training?
- What do we need to do to maintain compliance?
- Spill discovery and initial response procedures

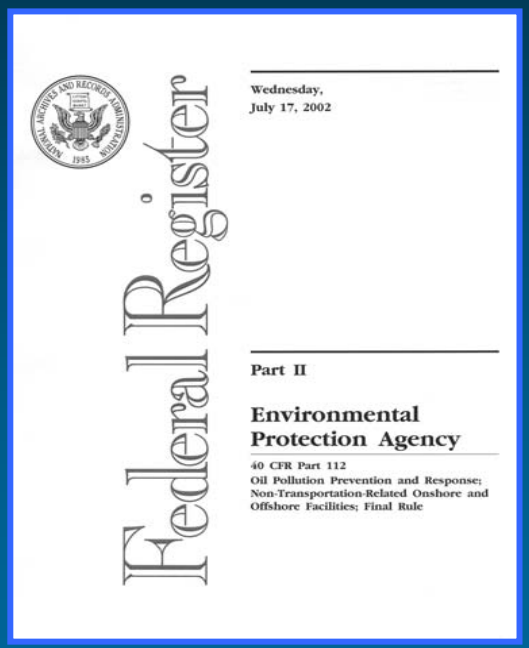
Introduction

- To address the potential environmental threat posed by petroleum and non-petroleum oils, the U.S. Environmental Protection Agency (USEPA) has established regulations designed to prevent oil spills

What is the USEPA's Oil Pollution Prevention Regulation?

- It is a regulation developed to prevent the discharge of oil into navigable waters of the U.S. and requires facilities to comply with certain spill prevention and control measures.
- The regulations have been in effect since 1974.

What does the regulation require a facility to do?



- The regulation (40 CFR Part 112), primarily requires that all subject facilities prepare and implement an SPCC Plan.
- Part 112 is generally practical and allow you to set site-specific procedures - as long as equivalent environmental protection is provided

Three Primary Goals of the SPCC Regulations:

- To prevent oil spills
- To prevent spilled oils from reaching navigable waters or adjoining shorelines
- To prepare for responding to a spill

What is an SPCC Plan?

- An SPCC plan is a detailed, facility-specific written document that describes how a facility's operations comply with the requirements of the regulation

What is the purpose of the SPCC Plan?

- To develop procedures and methods to prevent the discharge of oil from a facility into the *navigable waters* or *adjoining shorelines*

- To provide adequate secondary containment, such as berms and dikes, around oil storage areas at the facility

Requirements of Oil Spill Prevention Regulations

- The SPCC plan must be prepared in accordance with 40 CFR 112
- The SPCC plan must address all oil storage vessels, including tanks, transformers, drums, and smaller containers (>55-gals)
- The SPCC plan must be certified by a registered Professional Engineer
- The SPCC plan must be reviewed at least once every 5 years

Requirements of Oil Spill Prevention Regulations
(continued)

- The SPCC plan has to be amended if there are any changes in facility design, construction, operation or maintenance which materially affects the facility's potential for the discharge of oil

- The SPCC plan has to be amended and submitted to the USEPA if the facility has discharged more than 42-gals of oil in each of two discharges within a 12 month period or a single spill of 1,000 gals

Requirements of Oil Spill Prevention Regulations
(continued)

- The SPCC plan must address the use of "*appropriate containment and/or diversionary structures or equipment*" to prevent oil from being discharged
- The SPCC plan must identify who is the designated person accountable for oil spill prevention
- The SPCC plan must address emergency and spill response procedures, in the event of an oil spill

Who needs to have an SPCC Plan?

- Facilities, such as York College, that:
  - Due to their location, could reasonably be expected to discharge oil into or upon navigable waters of the U.S of adjoining shorelines, and
  - Have an aggregate aboveground oil storage capacity of >1,320 gallons, or
  - Have a total underground oil storage capacity of >42,000 gallons (includes USTs that are not subject to all the technical requirements of Part 280 or 281

What is an “oil?”

- “*Oil*” includes oil of any type and any form, including but not limited to:
  - Fats, oils or greases of animal, fish, or marine mammal origin
  - Vegetable oils, including oils from seeds, nuts, fruits or kernels (*i.e.*, cooking oils)
  - Other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oils mixed with wastes other than dredged spoil.

Why does York College need an SPCC Plan?

- York College is currently subject to the regulations based on the *reasonable potential* to discharge oil to *navigable waters* and on the basis that there is currently a total aboveground storage capacity of more than 1,320 gallons of oil.

What does the York College SPCC Plan contain?

- Campus map - showing each tank and associated transfer location
- Listing of all oil storage locations on campus
- Identification of potential spill sources, spill volumes and rates, and predicted fates of spills
- Discussion of available containment and/or diversionary structures or equipment

What does the York College SPCC Plan contain?

- Discussion of compliance with various SPCC plan components, including the following:
  - visual inspection procedures for ASTs and other containers/equipment
  - tanker truck unloading procedures
  - compliance with NYSDEC Petroleum Bulk Storage (PBS) regulations

What does the York College SPCC Plan contain?

- security measures, such as locked drain valves, fencing, lighting, and routine campus security inspections
- outline of the York College employee training program
- Emergency and spill response procedures, including spill discovery/initial response procedures, and internal/external reporting requirements

Why are you required to receive SPCC Plan training?

- Oil spill training is an important element in helping York College maintain compliance with the USEPA's regulations
- Most oil spills are caused by operator error
- Proper training can reduce the occurrence of spills and severity of impacts - if spills do occur
- Common sense awareness and O&M will prevent most spills

Why are you required to receive SPCC Plan training?

- USEPA requires operators of facilities to conduct facility-specific training regarding oil spill prevention and response measures
- “Oil-handling” employees must be trained on the operation and maintenance of equipment to prevent discharges of oil

What does York College need to do to maintain compliance?

- Perform various types of inspections
- Document inspections (*i.e.*, use forms provided)
- Perform Standard Operating Procedures (*e.g.*, truck unloading of fuel into tanks)
- Be aware of conditions that could result in a spill or leak of oil
- Know how to respond if you discover an oil spill

What does York College need to do to maintain compliance?

- Inspections, inspections, inspections…
  - visual monthly inspections (aboveground)
  - integrity inspections (aboveground and underground containers)

See the York College PBS Maintenance and Inspection Procedures Plan for specific details

What does York College need to do to maintain compliance?

- In accordance with the PBS regulations, York College must conduct monthly visual inspections of all registered ASTs (see *Monthly Tank Inspection Checklist,* Appendix C of the Draft SPCC Plan).

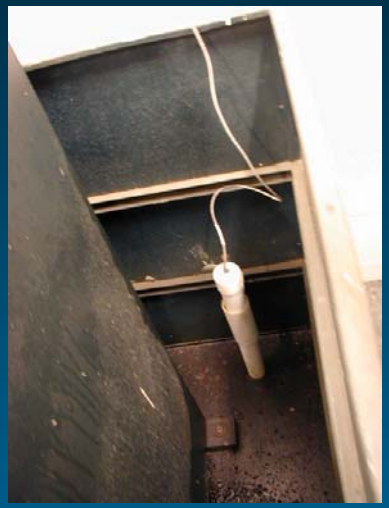
What does York College need to do to maintain compliance?

- Visually inspect all secondary containment systems on routine basis, during normal rounds to identify leaks or problems
- Perform the tanker truck unloading procedures at all times
- Perform routine inspections of oil spill clean up kits to confirm that adequate supplies are maintained

What does York College need to do to maintain compliance?

- Routinely inspect aboveground pipelines for signs of leakage or conditions that may result in a leak or pipe rupture.

What does York College need to do to maintain compliance?



- Routinely inspect (and document) tank level sensing equipment (gauges) and alarms to make sure that they function properly.

What do we need to do to maintain compliance?

- Be diligent and maintain awareness - as these are key components in achieving regulatory compliance, environmental protection, and occupational safety and health on campus

Spill Discovery and Initial Response Procedures

- In the event of an oil spill or leak, the person discovering the oil must **immediately** initiate the following actions ("SWIMS"):

  Stop the leak (*i.e.*, shut off valve)

  Warn others (*i.e.*, call for help - Spill Response Team Coordinator and/or Public Safety)

  Isolate the area (*i.e.*, rope off area, divert flow)

  Minimize your exposure (*i.e.*, use PPE)

  Standby to assist spill responders

Know where and how to use your spill cleanup kit

Spill Contingency Plan

Spill Discovery and Initial Response Procedures

- Contact Ching See Chan (York College Spill Response Team Coordinator) to provide information regarding the spill event.

Note: The Spill Response Team Coordinator will direct and coordinate the spill clean up activities and determine if an environmental contractor will be necessary to perform the cleanup activities. The Spill Response Team Coordinator will also determine if regulatory notifications are to be provided and will do so, if required.

Regulatory Spill Reporting

NYSDEC Notification:

- Report all oil spills to the NYSDEC *within* 2 HOURS after discovery, unless the spill meets ALL of the following criteria:

- Less than 5 gallons
- Spill is contained and under control
- Spill has not reached surface or ground water, or any land
- Spill is cleaned up within 2 hours of discovery

Regulatory Spill Reporting

USEPA Notification:

- Report an oil spill IMMEDIATELY to the National Response Center, if a spill flows into a storm water catch basin

Please Remember!

It is a lot cheaper to prevent a spill or release than to clean one up.