



Enviro REPORT

SPILL PREVENTION CONTROL & COUNTERMEASURE (SPCC) PLANS

Changes and Impacts

The August 2002 revision to the USEPA's SPCC regulations and ensuing consequences for facilities already in the Program have raised the level of awareness among the regulated community regarding the applicability and implementation of the Program. Many facilities with SPCC Plans have found the new inspection requirements daunting, hence the multiple extensions to the implementation deadline. Because of all of the discussion surrounding the Program changes, operations and establishments without a Plan are realizing that a Plan is indeed required at their location due to USEPA's broad **definition of oil** which includes:

- ▶ Petroleum Oil and Lubricants
- ▶ Mineral Oil
- ▶ Vegetable and Animal Oil
- ▶ Diesel Fuel
- ▶ Gasoline
- ▶ Fuel Oil

Many operations particularly with only fuel, lubricant, or used oil storage have not previously considered the impact of USEPA's SPCC requirements.

Who Needs an SPCC Plan?

In general, properties or facilities that have aggregate storage of oil or fuel greater than **1,320 gallons** are required to prepare and implement an SPCC Plan. Examples include:

- ▶ Industrial Facilities
- ▶ Manufacturing Operations
- ▶ Equipment Yards
- ▶ Commercial Properties
- ▶ Retail and Distribution Establishments
- ▶ Health Care & Educational Institutions

Regulatory requirements are outlined in 40 CFR Part 112. Capacity in aboveground storage tanks and containers 55 gallons or greater is to be considered when determining applicability. Underground storage tanks (USTs) are generally exempt if they are regulated and compliant with 40 CFR Part 280 and or 281 requirements.

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SPCC PLANS

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NPN Environmental Capabilities

NPN Environmental has prepared numerous new and revised SPCC Plans for various types of facilities and operations to comply with all measures of the new USEPA requirements. As part of assembling an SPCC Plan, NPN Environmental will:

- ▶ Identify sources of oil storage and develop spill control & response procedures
- ▶ Generate site drawings of oil storage locations, surface features and spill routes
- ▶ Create training and inspection programs and checklists

Please contact **Nic Neumann** by phone at **636-343-1300** or by email at **nic.neumann@npnenv.com** if we can be of any assistance in preparing or implementing a new or revised SPCC Plan.

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