

Required Contents of an SPCC Plan

This is a general summary of the requirements for a typical cotton gin that has only press pump tanks and possibly small above ground fuel tanks. There are additional requirements – especially if you have fuel operations or underground storage tanks. EPA does have a sample plan online.

You are subject to these rules if you store more than an aggregate 1320 gallons of oil (of any kind including vegetable oil) and fuel on site, and have a reasonable expectation of a discharge into or upon navigable waters of the US or adjoining shorelines. The 1320 gallon threshold includes any above ground storage containers 55 gallons or greater in capacity. The hydraulic fluid in the bale press is not considered oil storage but it is counted as part of the aggregate oil on site. The definition of navigable waters is very broad, and can be read to include almost any natural or man made body of water. It is important that you review the definition and compare it to your own operation.

A reportable spill is a single discharge of more than 1,000 gallons, or two discharges of more than 42 gallons in one year. If the oil reaches navigable water, it is reportable in any quantity significant enough to cause sheen on the water (one drop of oil). If you have a reportable spill, you will have to submit a SPCC plan to the EPA administrator.

Most portions of this plan are flexible, except for the secondary containment requirements. If the bale press is inside a building and any oil release from the press is unlikely to get out of the building or go down a drain that would get out of the building that could be considered secondary containment.

Here are general requirements of the plan:

1. Physical Layout of facility (facility diagram)
 - Include location, storage capacity and contents of each container
 - Must include all buried tanks, even if they are exempt from plan
 - Include all transfer stations and connecting pipes
 - Discharge prevention measures, including procedures for routine handling of products (loading, unloading, facility transfers, etc)
 - Discharge or drainage controls, such as secondary containment around containers and other structures, equipment, and procedures for control of a discharge.
 - Countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor)
 - Methods of disposal of recovered materials in accordance with applicable legal requirements
 - Contact list and phone numbers for the facility response coordinator, national Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge.
2. Provide information and procedures in plan to enable a person reporting a discharge to relate:
 - Exact address or location and phone number of facility

- Date and time of discharge
 - Estimation of total quantity of discharge
 - Source of discharge
 - Description of all affected media
 - Cause of discharge
 - Any damages or injuries caused by discharge
 - Actions being used to stop, remove, and mitigate effects of the discharge
 - Whether evacuation may be needed
 - Names of individuals and/or organizations who have also been contacted.
3. Organize portions of the plan describing procedures you will use when a discharge occurs in a way that will make them readily usable in an emergency and include appropriate supporting material as appendices.
- Be sure to provide and explain secondary containment measures.
 - i. A list of these is included in the rule – most common for us would be dykes or drain pans, curbing, weirs, booms, and sorbent materials.
 - ii. If secondary containment is not practicable, you must explain why, and provide an oil spill contingency plan, and a written commitment of manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful. For oil filled operational equipment (press pumps), you can use an inspection or monitoring program.
 - Conduct inspections and tests of storage tanks in accordance with written procedures, and keep records of these, signed by the appropriate supervisor or inspector, with the SPCC for a period of three years.
 - Proper training of personnel, including having a designated person accountable for discharge prevention, and briefings for all oil handling personnel at least once per year.
4. Proper Security for each facility includes securing oil containers, as well as valves, controls and piping. This includes fencing and lighting requirements, as needed.

Plans must be certified by a professional engineer, with the following two exceptions:

You can self certify your plan after meeting all requirements, if you have less than 10,000 gallons of total storage capacity (i.e., are a qualified facility), and have had no reportable spills with the past 36 months. You may not deviate from any of the requirements of the plan (such as secondary containment requirements) if you choose this option. You may use a contingency plan in place of secondary containment under this option for oil filled operational equipment.

If you meet the above requirements, and have no single tank larger than 5,000 gallons, there is a proposal that would allow you to complete and self certify the EPA provided SPCC plan template.

Plans should be reviewed whenever there is a material change to the facility, or every five years, whichever is shorter. EPA proposed further changes to the rule 10/15/07 that could further simplify the SPCC rule for gins and agriculture.