

## **S**PILL

# **PREVENTION**,

# **CONTROL, AND**

# COUNTERMEASURE PLAN TRAINING







### **Goals of SPCC Training**

- Introduce campus personnel to the written SPCC Plan and describe its:
  - Purpose and Scope
  - Location and Availability
  - Certification and Amendment Processes



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### **Goals of SPCC Training**

- Identify oil storage locations and spill pathways
- Explain oil transfer procedures
- Discuss spill prevention measures
- Familiarize campus personnel with appropriate spill response procedures and use of response equipment





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### The SPCC Plan

#### Spill Prevention, Control & Countermeasures Rule

- Code of Federal Regulations 40 CFR 112 details requirements of the SPCC Plan.
- Establishes procedures, methods, and equipment requirements to help prevent oil spills reaching navigable waters<sup>1</sup>.

<sup>1</sup>Oil can reach navigable waters via stormwater drains, floor drains, creeks, ditches, etc.





### The SPCC Plan

#### Spill Prevention, Control & Countermeasures Rule

- SPCC rules apply to facilities that have total ABOVEGROUND oil storage of more than 1,320 gallons and there is the potential for oil to reach streams or other water bodies.
- Containers with ≥55 gallon capacity count.





#### What kind of oils are covered?

- Oils and greases, including petroleum oil, crude oil, refined oil, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes.
- Fats, oils, or greases of animal, fish, and marine mammal origin.
- Vegetable oils, including oils from seeds, nuts, fruits, or kernels





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### The SPCC Plan

#### Oil stored at UGA include:

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 Fuel oil in aboveground tanks used for standby / emergency power and vehicle fueling.









New and used oil for vehicle maintenance, cooking, fire protection, etc.









 Oil-filled operational equipment, such as electrical transformers, elevator reservoirs, and lifts.







#### **Oil Storage at UGA Campuses:**

|                            | A       | THENS     | GR  | IFFIN    | TIF | TON      | SAPEL | O ISLAND | SKIDAW | AY ISLAND |
|----------------------------|---------|-----------|-----|----------|-----|----------|-------|----------|--------|-----------|
|                            | No.     | Capacity  | No. | Capacity | No. | Capacity | No.   | Capacity | No.    | Capacity  |
| ASTs                       |         |           |     |          |     |          |       |          |        |           |
| Emergency Power            | 24      | 10,395    | 1   | 1,500    | 3   | 700      | 1     | 270      | 6      | 1,185     |
| Fueling                    | 1       | 1,000     | -   | -        | 4   | 3,500    | -     | -        | -      | -         |
| Maintenance                | 7       | 2,330     | -   | -        | -   | -        | -     | -        | 1      | 296       |
| Heating                    | 2       | 1,190,700 |     |          |     |          |       |          |        |           |
| Other                      | 4       | 1,114     | -   | -        | -   | -        | -     | -        | 1      | 120       |
| Total Tanks                | 38      | 1,205,539 | 1   | 1,500    | 7   | 4,200    | 1     | 270      | 8      | 1,601     |
| Containers                 |         |           |     |          |     |          |       |          |        |           |
| Kitchen                    | 7       | 2,058     | -   | -        | -   | -        | -     | -        | -      | -         |
| Maintenance                | 17      | 1,174     | -   | -        | 6   | 330      | -     | -        | -      | -         |
| Other                      | 1       | 55        | -   | -        | -   | -        | -     | -        | -      | -         |
| Total Containers           | 25      | 3,287     | -   | -        | 6   | 330      | -     | -        | -      | -         |
| Oil-Filled Operational Equ | uipment |           |     |          |     |          |       |          |        |           |
| Transformers               | 222     | 71,412    | 12  | 2,999    | -   | -        | -     | -        | 13     | 3,430     |
| Elevators/Lifts            | 144     | 23,979    | 4   | 484      | 1   | 87       | -     | -        | -      | -         |
| Voltage Regulators         | 57      | 4,845     |     |          |     |          |       |          |        |           |
| Other                      | 2       | 680       |     |          |     |          |       |          |        |           |
| Total Oil-Filled Equip     | 425     | 100,916   | 16  | 3,483    | 1   | 87       | -     | -        | 13     | 3,430     |
| Total Aboveground Oil St   | orage   | 1,309,742 |     | 4,983    |     | 4,617    |       | 270      |        | 5,031     |





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#### **Oil Storage at UGA Campuses:**

 Refer to tables and diagrams in SPCC Plan for list of oil stored, potential discharge volumes, flow pathways, etc.

 Fable 5-2 Aboveground Storage Tanks and Containers, Including Potential Discharge Volumes and Pathways – Athens Campus

 (WITH CAPACITY 255 GALLONS)

|                                       |           |           |                 |                     |               |   | MAXIMUM<br>VOLUME          |   |  | FLOW                 | SEE          | INSPECTIONS/I | MAINTENANCE     |
|---------------------------------------|-----------|-----------|-----------------|---------------------|---------------|---|----------------------------|---|--|----------------------|--------------|---------------|-----------------|
| LOCATION                              | BLDG<br># | TYPE      | USE             | CONTENTS            | CAPAC-<br>ITY | POTENTIAL<br>FAILURE  | RELEASED<br>(GAL.)         | MAXIMUM DISCHARGE<br>RATE                                     | SECONDARY<br>CONTAINMENT   | DIREC-<br>TION       | DIA-<br>GRAM | FUNDING       | PERFORMED<br>BY |
| A.B.E.L.                              | 2580      | AST       | Emergency Power | Diesel              | 100           | Tank Failure<br>Pipe Failure/Leak                                   | 90<br>90                   | Gradual to immediate<br>20 gal/hr                             | Doublewalled Tank<br>Spill Response Materials  | NE to                | Z8           | RI            | FMD             |
|                                       |           |           |                 |                     |               | Tank Overfill   | 1-100                      | 50 gal/min  | Spill Response Materials   | ditch                |              |               |                 |
| Animal Health<br>Research <u>Cntr</u> | 1077      | AST       | Emergency Power | Diesel              | 1900          | Tank Failure<br>Pipe Failure/Leak                                   | 1710<br>1710               | Gradual to immediate<br>20 gal/hr                             | Doublewalled Tank<br>Spill Response Materials  | N to<br>drain        | H4           | RI            | FMD             |
| Biochemistry<br>Equipment<br>Canopy   | 2497      | AST       | Irrigation      | Diesel              | 70            | Tank Overfill<br>Tank Failure<br>Pipe Failure/Leak<br>Tank Overfill | 1-100<br>70<br>70<br>1-100 | 50 gal/min<br>Gradual to immediate<br>20 gal/hr<br>50 gal/min | Spill Response Materials<br>Containment Curb<br>Spill Response Materials<br>Spill Response Materials | Surroun<br>ding Soil | Y5           | RI            | FMD             |
| Bolton Dining<br>Commons              | 2265      | Container | Kitchen         | Used Cooking<br>Oil | 294           | Container Failure   | 294                        | Gradual to immediate  | Doublewalled Container   | NW to<br>drain       | E3           | FOOD SRVS     | FOOD SRVS       |
| Boyd Golf <u>Cntr</u>                 | 2694      | Container | Waste Oil       | Used Motor<br>Oil   | 294           | Container Failure   | 294                        | Gradual to immediate  | Doublewalled Container   | Interior             | Q4           | AUX SRVS      | AUX SRVS        |
| Brumby Hall                           | 2213      | AST       | Fire Pump       | Diesel              | 144           | Tank Failure<br>Pipe Failure/Leak<br>Tank Overfill                  | 130<br>130<br>1-100        | Gradual to immediate<br>20 gal/hr<br>50 gal/min               | Rupture Basin<br>Building Interior<br>Spill Response Materials                                       | SE to<br>drain       |              |               |                 |
|                                       |           | AST       | Emergency Power | Diesel              | 192           | Tank Failure<br>Pipe Failure/Leak                                   | 173<br>173                 | Gradual to immediate<br>20 gal/hr                             | Doublewalled<br>Building Interior  | SE to<br>drain       | E2           | HOUSING       | FMD             |



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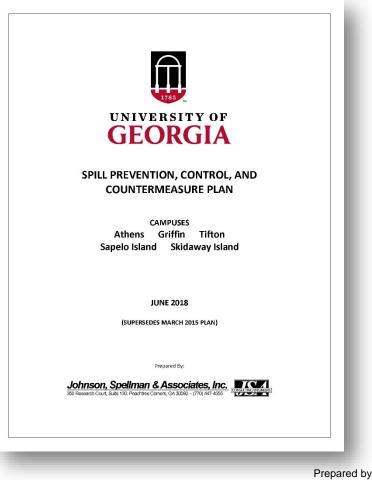


### The SPCC Plan

#### What is an SPCC Plan?

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A facility-specific, written document that describes how a facility's operations comply with regulation requirements.







#### What is an SPCC Plan?

- Spill PREVENTION preventing discharges of oil products used at the center, such as inspection and testing, security, and personnel training.
- Spill CONTROL describes control measures in place to prevent a spill from reaching the environment.
- Spill COUNTERMEASURES procedures for recovery, response, clean up, and disposal of oil spills.





#### Who needs SPCC training?

- Employees that are involved in oil handling, transfer, storage, and maintenance of oil equipment or spill response.
- Training must be completed:
  - <u>every year</u> for existing employees or immediately for new hires <u>or</u>
  - if there is a significant change in the SPCC Plan.

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### Responsibilities

# SPCC Coordinators (responsible for AST fuel and oil storage locations)

- Conduct monthly and annual inspections
- Conduct annual and new employee training
- Maintain and keep current all SPCC Plan documentation
- Initial response to a spill
- Notify Environmental Safety of spill
- Maintain spill kit materials adequate for oil storage

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### **SPCC Coordinators**

| SPCC<br>COORDINATOR | LOCATION                             |
|---------------------|--------------------------------------|
|                     |                                      |
| John McCollum       | Athens Campus                        |
| Dale Hess           | Griffin Campus                       |
| Tim Ross            | Tifton Campus                        |
| Mary Price          | Marine Institute on Sapelo Island    |
| Chuck Hartman       | Skidaway Institute of Oceanography / |
|                     | Marine Extension                     |





### Responsibilities

#### **Environmental Safety Division**

- Review annually and provide inventory changes from each SPCC Coordinator
- Review and provide updates/changes for SPCC Plan every five years and have certified by Professional Engineer
- Provide training assistance for SPCC Coordinator(s) and perform quality assurance audits
- Notify Regulatory Agencies
- File reports with Regulatory Agencies

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### **Spill Prevention and Control**

#### Oil Transfer

- A release is most likely to occur during oil/fuel transfer always use good handling practices.
- Use commercial firms experienced in transportation and handling of oil products.
- Campus personnel must be present during oil transfer.





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### **Spill Prevention and Control**

#### Oil Transfer

- Level of product in tank/container is to be continuously monitored during the transfer process.
- Inspect vehicle before departure to ensure all lines have been disconnected and valves are closed.
- Immediately report any spill to Environmental Safety.





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### **Spill Prevention and Control**

#### Inspections

- Inspections Forms [Appendix B]:
  - Record of Monthly Inspection Tanks/containers, oil-filled operational equipment (elevators, transformers, lifts)
  - Record of Annual Inspection Bulk storage tanks
- Inspection forms must be retained for at least three years.





### **Spill Prevention and Control**

#### Inspections

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- Inspections consist of a complete walk through of the tank/container/equipment area to identify:
  - Damage or leakage.
  - Stained or discolored ground surfaces.
  - Security problems.





### **Spill Prevention and Control**

#### **Integrity Testing**

- Performed by a certified tank inspector when:
  - Repairs or alterations are made to a tank.
  - Evidence of a leak is detected.
  - Results of a formal tank inspection reveals evidence of leakage or deterioration.





### **Spill Prevention and Control**

#### **Secondary Containment**

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All oil storage tanks/ containers/drums must be located in properly sized<sup>2</sup> containment, sufficiently impervious to contain oil.



DOUBLEWALLED TANK



CONTAINMENT WALL/CURB



RUPTURE BASIN



CONTAINMENT PALLET

<sup>2</sup>Sufficient for the entire capacity of the largest container and have sufficient freeboard to contain an additional 10% volume.





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### **Spill Prevention and Control**

#### **Secondary Containment**

- Water accumulated within secondary containment areas is inspected for the presence of a sheen or petroleum odor.
- If contaminated, use oil sorbent materials for small accumulations or contact the Environmental Safety Division.





### **Spill Prevention and Control**

#### **Secondary Containment**

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 Document removal using the Fluid Removal Record

[Appendix B].

| Removal Record           |   |
|--------------------------|---|
| i Kellioval Kecolu       |   |
| CCORDANCE WITH SECTION 3 | 2 OF THIS SPCC PLAN                                 |
| Date                     | Time  |
| Accumulated Fluid        |   |
| U Water                  | 50.0  |
| U Other (Spec            | cify)   |
|                          |   |
|                          |   |
|                          |   |
|                          |   |
|                          |   |
|                          |   |
|                          | CCORDANCE WITH SECTION S Date Accumulated Fluid Oil |



### **Spill Prevention and Control**

#### **Secondary Containment**

 Secondary containment is NOT required for qualified Oil-Filled Operational Equipment such as transformers, elevators, and lifts. However, SPCC rules require a Contingency Plan<sup>3</sup> must be in place [Appendix H].

<sup>3</sup>Contingency Plan focuses on the actions taken AFTER a spill has occurred.





### **Spill Countermeasures**

#### What if there is a spill?

- SAFETY COMES FIRST! Call 911 immediately if anyone is injured or if there is a potential for fire.
- Extinguish any source of ignition.
- Warn others and isolate the area.
- Determine the source of the release.
- If the quantity exceeds your abilities for containment, please call the Environmental Safety Division 706-583-0449.





### Spill Countermeasures

Procedures for handling Incidental and Emergency spills (for containment only)

#### What if there is an INCIDENTAL spill?

- Incidental Spill Defined
  - Manageable spill that poses low risk to safety.
  - Not likely to adversely impact the environment.
  - Typically < 5 gallons. (Within the scope of the UGA Spill Response Team.)

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### **Spill Countermeasures**

#### What if there is an INCIDENTAL spill?

- Incidental Spill Actions
  - 1. First, ensure your own personal safety!
  - 2. Attempt to stop the release at its source (i.e., close valves, upright drums, etc.).
  - 3. Contain/prevent the spill from spreading using spill response materials located on campus. *Refer to SPCC Plan for nearest spill kit location on campus.*

Continued...





### **Spill Countermeasures**

#### What if there is an INCIDENTAL spill?

- Incidental Spill Actions (continued)
  - 4. Document Spill using Oil Spill Report [Appendix B].
  - 5. Notify Environmental Safety Division 706-583-0449.





### **Spill Countermeasures**

#### Oil Spill Report – Incidental Spill

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|   | REPORT MUST BE C   | OMPLETED IN ITS ENTIRET                | Y                         |
|---|--|--|---------------------------|
| Name of Person Reporting Sp   | ill.   | Telephone Number                       |                           |
| Joe Bloggy  |  | 706-555-123                            | 4                         |
| Date of Spill 5/2/12  | Time of Spill<br>10:15 am  | Date of Report<br>5/2/12               | Time of Report<br>2:30 pm |
| ocation of Spill  |  | Type of Oil Spilled                    |                           |
| Engine Roo  | m  | Lusa                                   | /                         |
| 2 gallons   |  |  |                           |
| as Spill Breached Secondar  | y Containment Area?  | Has Oil Entered A Storm Sew            | rer?                      |
| ☐ Yes   | 🗹 No   | □ Yes                                  | 🗹 No                      |
| Source of Spill   |  | Affected Medium                        |                           |
| Storage Tank  |  | Soil                                   |                           |
| Tank Truck in   | Product Transfer Area  | □ Water                                |                           |
| Ancillary Equip   | oment (specify)  | Concrete                               |                           |
|   | uel piping   | Other (specify                         | )                         |
|   |  | -                                      |                           |
| Leak at FOS ca<br>Damages or Injuries Caused b<br>None  | onnection at generato<br>ay spill  | r                                      |                           |
| Damages or Injuries Caused b  |  |  |                           |
| Damages or Injuries Caused b<br>None<br>Actions Being Used to Stop, R   | by Spill<br>ternove, and Mitigate the Effects of the S   | pill                                   | nd, node used to          |
| Damages or Injuries Caused b<br>None<br>Actions Being Used to Stop, R<br>(1) Valve close  | ry Spill<br>terrove, and Mitigate the Effects of the S<br>d to stop flow; (2) ab:  | pill<br>sorbent material a             | nd pads used to           |
| Damages or Injuries Caused b<br>None<br>Actions Being Used to Stop, R<br>(1) Valve close<br>clean up sy   | ny Spill<br>terrove, and Mitigate the Effects of the S<br>d to stop flow; (2) ab;<br>pill; (3) connection fi                                 | pill<br>sorbent material a             | nd pads used to           |
| Damages or Injuries Caused b<br>None<br>Actions Being Used to Stop, R<br>(1) Valve close<br><u>clean up y</u><br>s an Evacuation of the Local           | ny Spill<br>temove, and Mitigate the Effects of the S<br>d to stop flow; (2) ab<br><u>sill; (3) connection fi</u><br>Area Warranted?         | pill<br>sorbent material a             | nd pads used to           |
| Damages or Injuries Caused b<br>Nonce<br>Actions Being Used to Stop, R<br>(1) Valve close<br><u>clean up y</u><br>s an Evacuation of the Local<br>Q Yes | ny Spill<br>temove, and Mitigate the Effects of the S<br>d to stop flow; (2) ab<br><u>sill; (3) connection fi</u><br>Area Warranted?<br>☑ No | pill<br>sorbent material a<br>ightened | nd pads used to           |
| Damages or Injuries Caused b<br>Nonce<br>Actions Being Used to Stop, R<br>(1) Valve close<br><u>clean up y</u><br>s an Evacuation of the Local<br>Q Yes | ny Spill<br>temove, and Mitigate the Effects of the S<br>d to stop flow; (2) ab<br><u>sill; (3) connection fi</u><br>Area Warranted?         | pill<br>sorbent material a<br>ightened | nd pads used to           |





### **Spill Countermeasures**

#### What if there is an EMERGENCY spill?

- Emergency Spills Defined
  - Quantity spilled is >5 gallons. (Outside scope of the UGA Spill Response Team.)
  - Has entered sanitary/storm drain or ground/surface water.
  - Cannot be stopped.
  - Poses a fire/explosion hazard.
  - Additional spill equipment is needed.

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### **Spill Countermeasures**

#### What if there is an EMERGENCY spill?

- Emergency Spills Actions
  - 1. First, ensure your own personal safety!
  - 2. If it is safe to do so, attempt to stop the release at its source (i.e., close valves, upright drums, etc.).
  - **3**. Take action to prevent the spill from entering storm drains or streams and to minimize the area affected by using the spill materials located on campus.

Continued...



### **Spill Countermeasures**

#### What if there is a spill?

- Emergency Spills Actions (continued)
  - 4. Contact UGA's SPCC Coordinator who will contact and coordinate with the Spill Cleanup Contractor to remediate, and/or dispose of oil impacted soils, absorbent material, and tools contaminated with oil.
  - 5. Document spill using Oil Spill Report [Appendix B].
  - 6. Notify Environmental Safety Division 706-583-0449.





### **Spill Countermeasures**

**Oil Spill Clean-up Contractor** 

The University of Georgia maintains signed agreements with the following Cleanup Contractor:

> Parker Young Construction 888-303-9288

 All UGA response calls will be coordinated between the designated SPCC Coordinator and ESD.





### **Spill Countermeasures**

#### **Spill Response Materials**

- List of spill kit locations at each campus is located in The Contingency Plan Section 5 [Appendix H].
- Materials include absorbent pads, absorbent material, and personal safety equipment.
- Contact Environmental Safety Division for removal of spent absorbent materials.





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### **Spill Countermeasures**

#### Oil Spill Report – Emergency Spill

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|   | REPORT MUST BE C   | COMPLETED IN ITS ENTIRETY  |                           |
|---|--|--|---------------------------|
| ame of Person Reporting Sp  | pill   | Telephone Number   |                           |
| Sammy So  |  | 706-555-   |                           |
| Date of Spill 5/2/12  | Time of Spill<br>10:15 am  | Date of Report<br>5/2/12   | Time of Report<br>2:30 pm |
| ocation of Spill  |  | Type of Oil Spilled  |                           |
| North Park  | ing Area   | G  | asoline                   |
| stimated Volume   |  |  |                           |
| 30 gallons  |  |  |                           |
| as Spill Breached Secondar  | ry Containment Area?   | Has Oil Entered A Storm Sewer?   |                           |
| Yes   | □ No   | 🗌 Yes  | No No                     |
| Source of Spill   |  | Affected Medium  |                           |
| Storage Tank  |  | Soil   |                           |
| Tank Truck in   | Product Transfer Area  | U Water  |                           |
|   |  |  |                           |
| Ancillary Equi  | pment (specify)  | Concrete   |                           |
| Product relea   | se from tank vent du   | Other (specify)  | m with overfill           |
| Cause of Spill<br>Product relea<br>valve suspecte<br>Damages or Injuries Caused   | se from tank vent dui<br>idi<br>by Spill   | Other (specify)  | m with overfill           |
| Cause of Spill<br>Product relea<br>valve suspecte<br>Damages or Injuries Caused<br>Contaminated   | se from tank vent dui<br>idi<br>by Spill   | Other (specify)<br>ring delivery. Proble                                   | m with overfill           |
| Cause of Spill<br>Product relea<br>valve suspecte<br>Damages or Injuries Caused<br>Contaminated<br>Actions Being Used to Stop.<br>Fuel Loading  | se from tank vent due<br>ed.<br>by Spill<br>d soil<br>Remove, and Mitigate the Effects of the S<br>terminated, spill in p                                    | _ Other (specify)<br>ring delivery. Proble                                 |                           |
| Source of Spill<br>Product relea<br>valve suspects<br>Damages or Injuries Caused<br>Contaminated<br>Actions Being Used to Stop, I<br>Fuel Loading<br>spill kit mate   | se from tank vent due<br>tob<br>by Spill<br>d soil<br>Remove, and Mitigate the Effects of the S<br>terminated, spill in p<br>rials:                          | _ Other (specify)<br>ring delivery. Proble                                 |                           |
| Cause of Spill<br>Product relea<br>valve suspects<br>Damages or Injuries Caused<br>Contaminated<br>Contaminated<br>Scions Being Used to Stop, I<br>Fuel Loading<br>Spill kit mate<br>s an Evacuation of the Local     | se from tank vent due<br>tob<br>by Spill<br>d soil<br>Remove, and Milgate the Effects of the S<br>terminated, spill in p<br><u>rials.</u><br>Area Warranted? | _ Other (specify)<br>ring delivery. Proble                                 |                           |
| Cause of Spill<br>Product relea<br>valve suspects<br>Damages or Injuries Caused<br>Contaminated<br>Contaminated<br>Contaminated<br>Stop, I<br>Fuel Loading<br>spill kit mate<br>s an Evacuation of the Local<br>Q Yes | se from tank vent due<br>by Spill<br>d soil<br>Remove, and Mitigate the Effects of the S<br>terminated, spill in p<br>nials.<br>Area Warranted?              | Other (specify)<br>ring delivery. Proble<br>spill<br>parking area cleaned  |                           |
| Cause of Spill Product relea valve suppects Damages or Injuries Caused Contaminated Actions Being Used to Stop, I Fuel Loading spill kit mate s an Evacuation of the Local U Yes ndividual(s) and Organization        | se from tank vent due<br>tob<br>by Spill<br>d soil<br>Remove, and Milgate the Effects of the S<br>terminated, spill in p<br><u>rials.</u><br>Area Warranted? | Other (specify)_<br>ring delivery. Proble<br>spill<br>parking area cleaned | i up using on site        |



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### **Spill Countermeasures**

#### **Typical Spill Response Material**



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LOOSE ABSORBENT





ABSORBENT PADS

**OIL ONLY ABSORBENT BOOMS** 





### **Spill Countermeasures**

#### **Typical Spill Response Material**





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### Spill Countermeasures

#### Notification Procedures in the Event of a Spill

- Environmental Safety Division (M-F 8 AM 5 PM)
   706-583-0449
- University Police (8 AM 5 PM and after hours)
   706-542-2200



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### **Spill Countermeasures**

#### Notification Procedures in the Event of a Spill

Environmental Safety Division will notify the following Regulatory Agencies:

- GA Dept of Natural Resources
   800-241-4113
- National Response Center 800-424-8802
- US EPA, Region IV 404-562-8700





### **Spill Countermeasures**

#### What spills need to be reported?

- Discharges that cause a film, sheen or discoloration of the water or adjoining shoreline.
- Discharges that cause a sludge or an emulsion to be deposited beneath the surface of the water or upon the adjoining shorelines.
- Discharges that violate applicable water quality standards.





### **Spill Countermeasures**

#### **Recordkeeping Requirements**

- Records related to the SPCC Plan must be maintained for no less than three years.
- Records must be available for EPA inspection.
- All records of inspections, spills, training must be kept with your SPCC Plan.





### Maintaining the SPCC Plan

Environmental Safety personnel will:

- Issue departmental request for inventory changes annually.
- Review and evaluate the facility and SPCC Plan at least once every five years.
- Amend SPCC Plan if there is a change in design, operation or maintenance that affects the facility's potential to discharge petroleum.

Note: Changes made to the emergency contact list and other administrative changes need not be reviewed and certified by a Professional Engineer.







# Questions and Comments



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