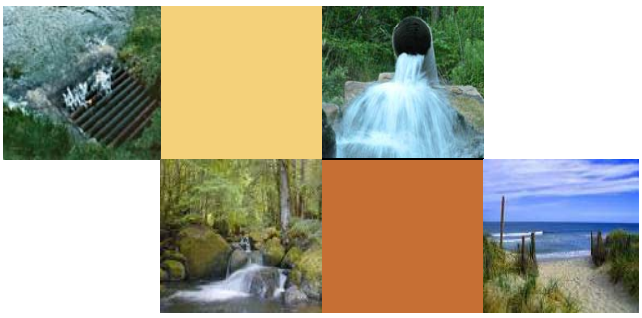
STORMWATER COMPLIANCE FOR DPW OPERATIONS



PRESENTED BY:

EJIF

Today's Topics

- NJ's Municipal Stormwater Regulation Program (MSRP)
  - Introduction of the EJIF Employee Training Video
  - Where should you be now?
  - 1st Permit Cycle ends April 2009
- Focus: Illicit Connections & Investigations

EJIF

EJIF Employee Training Video

- EJIF Stormwater Training Video – October 1 Launch on MEL website

  www.njmel.org
- NJDEP has approved video as a mechanism to satisfy the Annual Employee Training Requirement

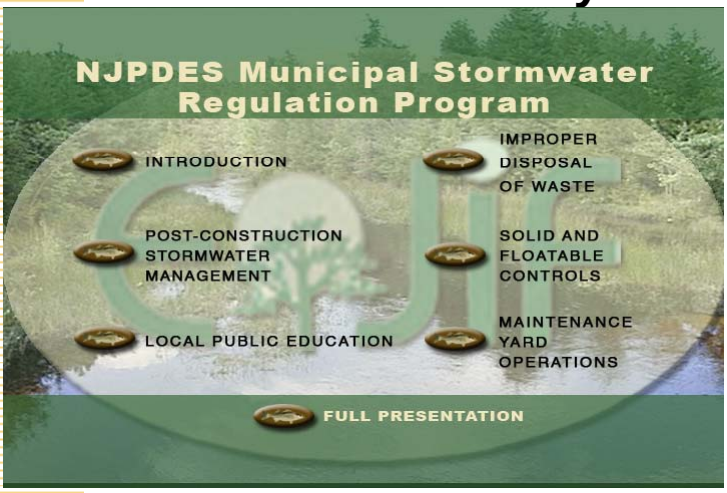
EJIF Employee Training Video

- Tool for employee training
- Must train ***appropriate*** employees on ***appropriate*** topics
- Should have other resources available such as the SPPP, NJDEP Guidance Document, Ordinances, etc.
- DVD copies of stormwater training video will be made available, by request, at a later date

Don’t Forget to Document Your Training

- The following must be included with the Annual Report:
  - Date of Training
  - Topics Covered
  - Employee’s Names
  - Sign in Sheets
  - Description of Training Materials Used

Main Menu Screen Layout



EJIF Employee Training Video

Municipal Stormwater Regulation Program Employee Training Video Introduction

By Now, Everyone Should Know How We Got Here

- February 2, 2004 – NJDEP published NJPDES amendments in response to EPA's Phase II Rules
- Municipal Stormwater Regulation Program
  - All 566 NJ municipalities.
  - All 21 NJ counties.
  - State, county and interstate transportation entities.
  - Some public complexes, such as colleges/universities, hospitals, prisons, etc.
  - Some municipal industrial operations (e.g. wastewater treatment plants)

Municipal Stormwater Regulation Program

- Tier A and B General Stormwater Permits
  - Both required adoption of a Municipal Stormwater Management Plan and Stormwater Control Ordinance by April 2006
- Tier A required the completion of a Stormwater Pollution Prevention Plan by April 2005
- Permit Cycle Based Upon EDPA (Typically 4/1 through 3/31)

Where should you be today?

- Post Construction
  - Municipal Stormwater Management Plan and Stormwater Control Ordinance must be adopted
  - Municipality must be implementing Post Construction Management
    - Ensuring Compliance with RSIS
    - Completing long term O&M of BMPs on municipal properties
    - Ensuring the long term O&M for BMPS on private properties is conducted
    - Meeting new design standards for storm drain inlets
    - Ensuring compliance with the stormwater control ordinance

Where should you be today?

- Implementing Local Public Education
  - Distribution of NJDEP Brochure to all residents and businesses ANNUALLY
    - NJDEP will be introducing Tip Cards
  - Conducting an ANNUAL educational event
  - Distributing pet waste brochure with pet licensing
  - 50% complete with storm drain inlet labeling program by April 2007
    (100% by 2009)

Where should you be today?

- Implementing Improper Disposal of Waste
  - Enforcing Pet Waste, Litter, Improper Disposal of Waste, Yard Waste Collection and Illicit Connection Ordinances
  - Implementing Illicit Connection Elimination Program and complete initial inspections of all outfalls by April 2009
  - 50% complete with storm drain outfall mapping program by April 2007
    (100% by 2009)

Where should you be today?

- Implementing Solids and Floatable Controls
  - Performing monthly street sweeping and recording waste totals & distance swept
  - Retrofitting storm drain inlets during road projects
  - Annual inspection and cleaning of all stormwater facilities
  - Implementing roadside erosion control and outfall stream scouring remediation programs

Where should you be today?

- Implementing Maintenance Yard Operations BMPs
  - Must have permanent storage structure for deicing material (April 2007) and comply with uncovered clean sand set back of 50 feet
  - Implementing SOPs (and regular inspections) for Fueling Operations, Vehicle Maintenance and Good Housekeeping
  - Planning the cessation of the discharge of vehicle wash waters by February 2009
    - The washing of firefighting vehicles has been added as an allowable discharge

Deicing Material Storage Structures - Recent NJDEP Interpretation

- Fabric structures must meet the following:
  - Designed to withstand at least 110mph winds.
  - Covered by a PVC or other similar fire rated material with a min. twenty (20) year warranty.
  - Concrete blocks, Jersey barriers or other similar material must be placed around the interior of the structure to protect the sidewalls during loading and unloading
  - Must prevent stormwater run-on and run through.
  - Must be erected on an impermeable slab.
  - Cannot be open-sided.
  - Must have a roll-up door or other means of sealing the access way from wind-driven rainfall.

ermanent Structures – At this time, NJDEP recommends oors or other means to prevent exposure to wind driven precipitation.

Where should you be today?

- Performing Annual Employee Training
  - EJIF Stormwater Training Video – October 1 Launch on MEL website www.njmel.org
- Updating and recertifying the Stormwater Pollution Prevention Plan Annually
- Updating the source material inventory and associated BMPs annually
- Submitting Annual Report and Certification ELECTRONICALLY by **May 2** of each year

Common Problems with Implementation

- Vehicle Fueling SOP – Implementation of Bulk Delivery Requirements
- General Good Housekeeping SOP – Regular inspections of DPW yards for source material
- Identification of Municipal Stormwater BMPs and inspection/maintenance of these systems
- Proper Management of Road Waste and Wastewaters Generated During Inlet Cleaning

Looking Forward to the Close of the First Permit Cycle…

- All **ordinances** must be fully adopted and in place
- All new storm drain inlets must be **bicycle safe & closed back**
- All applicable storm drains must be **labeled by 2009**
- **Map** of all stormwater outfalls must be completed by 2009.
- Every outfall must have initial **illicit connection** inspection by 2009.
- Every outfall must have initial **scouring** inspection by 2009.
- **Permanent structure** for salt. NO TARPING !!
- All required **SOPs & source material inventory** completed and being implemented
- Must cease uncontrolled municipal **vehicle washing** by 2009

A Closer look at the Illicit Connection Elimination Program…

- Illicit Connection Elimination Program
  - What is required by NJDEP?
  - Examples of Illicit Connections?
- Dry Weather Flows & Intermittent Flows
  - Identification
  - Sampling
  - Elimination

Illicit Connection Program: What is required?

Illicit Connection Elimination Program:

- Each Tier A Municipality must develop and implement a program to detect and eliminate illicit connections into the Municipality's small MS4. The program, at minimum, must include an initial physical inspection of all its outfall pipes. All outfall pipes that are found to have dry weather flow are to be further investigated.
- Key Words:
  - Dry Weather Flow – 3 Days (72 hours) of no precipitation. Inspect Outfall for flow. If flow is present, this is considered a "**Dry Weather Flow**".
  - If there is staining or evidence of contamination but no flow, this is considered a possible "**Intermittent Flow"**.
  - "**Illicit Connection Inspection Report Form**" must be completed for each outfall present in the municipality

Typical Illicit Connections Associated with Public Work Facilities

- Discharges from floor drains and oil/water separators
- Compressor and boiler blowdown
- Unauthorized discharges from secondary containment structures
- Cooling tower bleed off
- Filter backwash water
- Hydrostatic testing water
- Water main disinfection water
- Vehicle/equipment wash waters (Tier A Permit allows until 2/28/2009)
- Construction dewatering
- Plant effluent (requires Beneficial Re-use Permit)

EJIF

Illicit Connection Inspection Report Form

Municipality Information:

Municipality: _____ County _____

NJPDES #: _____ PI ID #: _____

Team Member: _____

Date _____ Effective Date of Permit Authorization (EDPA): _____

Outfall #: _____ Location: _____

Receiving Waterbody: _____

1. Is there a dry weather flow? Y ( ) N ( )
2. If "YES", what is the outfall flow estimate? _____ gpm
   (flow sample should be kept for further testing, and this form will need to be submitted with the Annual Report and Certification)
3. Are there any indications of an intermittent flow? Y ( ) N ( )
4. If you answered "**NO**" to BOTH question #1 and #3, there is probably not an illicit connection and you can skip to question #7.
   (NOTE: This form **does not** need to be submitted to the Department, but should be kept with your SPPP.)
   If you answered "**YES**" to either question, please continue on to question #5.
   (NOTE: This form will need to be submitted to the Department with the Annual Report and Certification.)
5. **PHYSICAL OBSERVATIONS**:

(a) **ODOR**: none sewage sulfide oil gas rancid/sour other: _____

(b) **COLOR**: none yellow brown green red gray other: _____

(c) **TURBIDITY**: none cloudy opaque

(d) **FLOATABLES**: none petroleum sheen sewage other: _____

(e) **DEPOSITS/STAINS**: none sediment oily other: _____

(f) **VEGETATION CONDITIONS**: normal excessive growth inhibited growth

(g) **DAMAGE TO OUTFALL STRUCTURES**:

IDENTIFY STRUCTURE: _____

DAMAGE: none concrete spalling/cracking peeling paint
metal corrosion other damage _____

6. **ANALYSES OF OUTFALL FLOW SAMPLE:**
   * field calibrate instruments in accordance with manufacturer's instructions prior to testing.

(a) **DETERGENTS**: _____ mg/L

(if sample is greater than 0.06 mg/L, the sample is contaminated with detergents (which may be from sanitary wastewater or other sources). Further testing is required and this outfall should be given the highest priority.)

(if the sample is not greater than 0.06 mg/L and it does not show physical characteristics of sanitary wastewater [e.g., odor, floatables, and/or color] it is unlikely that it is from sanitary wastewater sources, yet there may still be an illicit connection of industrial wastewater, rinse water, backwash or cooling water. Skip to question #6c.).)

(b) **AMMONIA (as N) TO POTASSIUM RATIO**: _____

(if the Ammonia to Potassium Ratio is greater than 0.6:1, then it is likely that the pollutant is sanitary sewage)

(if the Ammonia to Potassium Ratio is less than or equal to 0.06:1, then the pollutant is from another washwater source.)

(c) **FLUORIDE**: _____ mg/L

(if the fluoride levels are between 1.0 and 2.5 mg/L, then the flow is most likely from fluoride treated potable water.)

(if the sample tests below a detection limit of 0.1 mg/L for fluoride, it is likely to be from groundwater infiltration, springs or streams. In some cases, however, it is possible that the discharge could originate from an onsite well used for industrial cooling water which will test non-detect for both detergents and fluoride. To differentiate between these cooling water discharges and ground water infiltration, you will have to rely on temperature.)

(d) **TEMPERATURE**: _____ °F

(if the temperature of the sample is over 70°F, it is most likely cooling water)

(if the temperature of the sample is under 70°F, it is most likely from ground water infiltration)

7. Is there a suspected illicit connection? Y ( ) N ( )
   If "**YES**", what is the suspected source? _____
   If "**NO**", skip to signature block on the bottom of this form.
8. Has the investigation of suspected illicit connection been completed? Y ( ) N ( )
   If "**YES**", proceed to question #9.
   If "**NO**", skip to signature block on the bottom of this form.
9. Was the source of the illicit connection found? Y ( ) N ( )
   If "**YES**", identify the source: _____
   What plan of action will follow to eliminate the illicit connection? _____

Resolution: _____

If "NO", complete the Closeout Investigation Form and attach it to this Illicit Connection Inspection Report Form.

Investigating Dry Weather Flows



Dry weather Flows & Intermittent Flows

- Submit all completed Illicit Connection Inspection Report Forms with your Annual Report to NJDEP
- If an **"intermittent flow"** is identified, you must perform, at minimum, three (3) additional investigations in an attempt to identify dry weather flow and investigate the potential illicit connection.
- If an illicit connection cannot be located or is found to emanate from another public entity, Tier A Municipalities must submit to the Department a written explanation detailing the results of the investigation and notify that public entity.
- NJDEP will determine if such measures were adequate and will notify the Tier A Municipality of the determination. All illicit connections found and subject to the ordinance prohibiting illicit connections must be eliminated within six (6) months of the discovery.

Signs of Intermittent Flows

- Staining on the outfall structure
- Deterioration of the outfall structure
- Excess or limited vegetative growth in the immediate vicinity of the outfall

Submerged Outfall Structures

- Inspection of submerged outfalls must be completed. Methods can include:
  - Inspection of the area in the immediate vicinity for signs of flow from the structure
  - Inspection of an upgradient inlets or manholes for signs of dry weather flow
  - Camera the line to confirm presence or absence of flow

Dry Weather Flows – Common Characteristics

Odor / Sewage Sulfur Smells	Smell associated with stale/septic sanitary wastewater. ("rotten eggs"): industries that discharge sulfide compounds or organics (meat packers, canneries, dairies, etc.).
Oil and Grease	Petroleum refineries or many facilities associated with vehicle maintenance or petroleum product storage.
Rancid-sour	Food preparation facilities (restaurants, hotels, etc.).
Color	Important indicator of inappropriate industrial sources. Industrial dry weather discharges may be of any color, but dark colors, such as brown, gray, or black, are most common.
Yellow	Chemical plants, textile and tanning plants.
Brown	Meat packers, printing plants, metal works, stone and concrete, fertilizers, and petroleum refining facilities, sediment laden muddy waters
Red	Sediment laden waters with high Iron content; Meat Packers
Gray	Dairies, sewage waste.
Turbidity	Often affected by the degree of gross contamination. Dry weather industrial flows with moderate turbidity can be cloudy, while highly turbid flows can be opaque. High turbidity is often a characteristic of undiluted dry weather industrial discharges.
Cloudy	Sanitary wastewater, concrete or stone operations, fertilizer facilities, and automotive dealers.
Opaque	Food processors, lumber mills, metal operations, pigment plants.
Floatable Matter	A contaminated flow may contain floating solids or liquids directly related to industrial or sanitary wastewater pollution. Floatables of industrial origin may include animal fats, spoiled foods, solvents, sawdust, foams, packing materials, or fuel. Floatables in sanitary wastewater include fecal matter, toilet paper, etc..

Investigation Tools

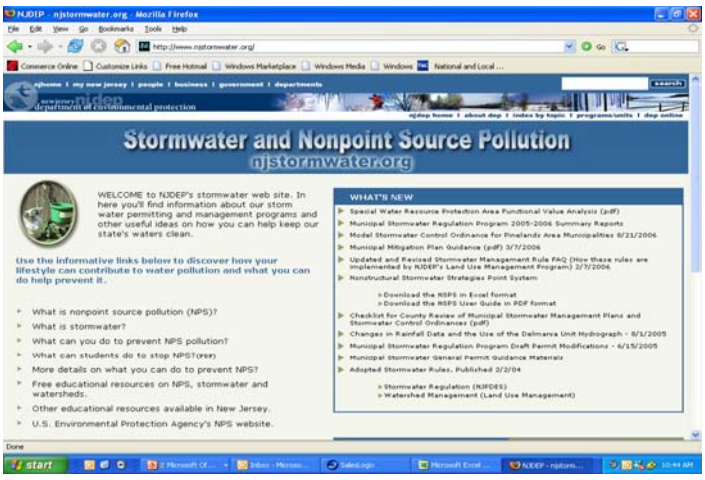
- Sample collection is not required, but is an example of one tool to help determine the source of a dry weather flow. Other tools include:
  - Camera inspection
  - Smoke Tests
  - Dye Tests
  - Visual inspections
- Once you identify a dry weather flow and you cannot determine the source from upstream visual investigation, sample collection is an option to help differentiate between
  - potable water
  - sanitary waste water
  - groundwater
- Required parameters & common costs per sample if sent to a laboratory
  - MBAS (surfactants) $60
  - Fluoride $25
  - Ammonia $30
  - Potassium $22
  - *(total $137)*

Paperwork

- Illicit connection inspection reports must be submitted to NJDEP with the Annual Report for all outfalls with dry weather or intermittent flows
- Illicit connection inspection reports for outfalls found to be dry, must be retained with the SPPP for NJDEP inspection

Need More Info?

http://www.njstormwater.org



In the News from NJDEP….

Emergency Generators

- Record Keeping Requirements for EGs 37 kW or greater
  - Record reason for operation, date, start/stop time, total operating time and operator's name
- Check Air Quality Forecast prior to testing and maintenance at http://www.state.nj.us/dep/aqpp/

In the News from NJDEP….

Underground Storage Tanks

- New guidance was issued by the USEPA regarding UST Inspections and State Compliance Reporting. The guidance indicates that States had until August 8, 2007 to inspect all USTs for compliance and must re-inspect each regulated tank every 3 years.

In the News from the USEPA….

Spill Prevention Control and Countermeasure

- Effective February 26, 2007: Amendments allow “Qualified Facilities” to self-certify plan without P.E. certification
  - 10,000 gallons or less of aggregate above ground petroleum storage volume
  - Dependent on spill history at the site

Questions?

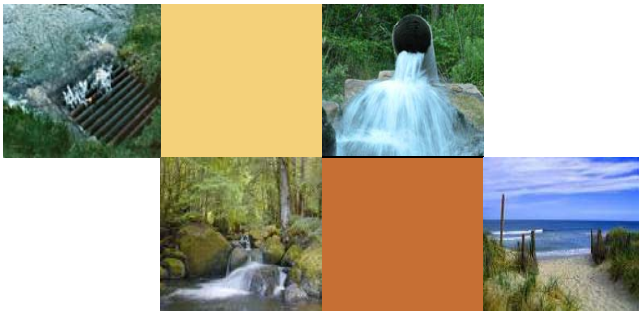
Richard Erickson
rerickson@pmkgroup.com

Chris Gulics
cgulics@pmkgroup.com

Matthew Mee
mmee@pmkgroup.com

1-800-879-6681

AIR PERMITTING AND EMERGENCY GENERATORS



PRESENTED BY:

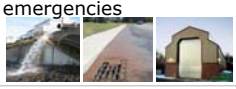
PMK Group
CONSULTING & ENVIRONMENTAL ENGINEERS
SERVICE SOLUTIONS SATISFACTION

New Emergency Generator Requirements

- Change #1 – November 7, 2005
  - 37 kW and greater must comply with the following record keeping requirements:
    - Record total operating time monthly
    - For each testing/maintenance activity, record the reason for operation, date, start/stop time, total operating time and operator's name
    - Retain voltage reduction notification from PJM Interconnect (if applicable)
    - Retain all records for 5 years
  - Check the Air Quality Forecast Prior to Testing and Maintenance
    - Prior to testing/maintenance, log onto http://www.state.nj.us/dep/aqpp/
    - Click the following link on the left side of the homepage

      AQ Forecast for Emergency Gen.
    - Testing/maintenance **CANNOT** be performed if the air quality **ANYWHERE IN NJ** is Unhealthy for Sensitive Groups, Unhealthy, Very Unhealthy or Hazardous
    - Emergency generators can be used for emergencies regardless of air quality

EJIF



New Emergency Generator Requirements

- Change #2 – January 5, 2007
  - New Revised General Air Permit GP-005
    - A New GP-005 was required to be submitted by March 1, 2007
    - Permits multiple generators at a single facility with a total combined heat input of up to 80 million BTU/hr
    - Facilities with PCP not required to file a new GP-005
    - No fee to re-file by March 1, 2007
    - Failure to submit may result in enforcement action and fees
    - Testing and Maintenance up to a maximum of 100 hrs/yr per unit
    - Does not limit run time hour for emergencies or voltage reduction (if authorized by PJM Interconnect)
    - Air Quality Forecast and recordkeeping requirements are same as Change #1.
    - Diesel generator operators must retain low sulfur (≤2%) certification

Need more info?

http://www.state.nj.us/dep/aqpp/ – **Current Air Regs**

http://www.state.nj.us/dep/opra/online.html - **Search existing permits & ID's**

Questions?

Richard Erickson
rerickson@pmkgroup.com

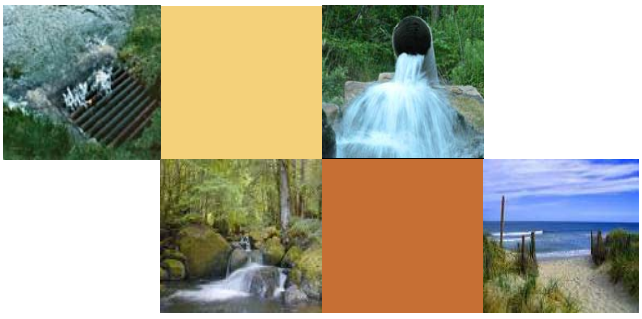
Chris Gulics
cgulics@pmkgroup.com

Matthew Mee
mmee@pmkgroup.com

1-800-879-6681

EJIF

UNDERGROUND STORAGE TANK REGULATIONS
N.J.A.C. 7:14B



PRESENTED BY:

PMK Group
CONSULTING & ENVIRONMENTAL ENGINEERS
SERVICE SOLUTIONS SATISFACTION

Underground Storage Tank Regulations
N.J.A.C. 7:14B

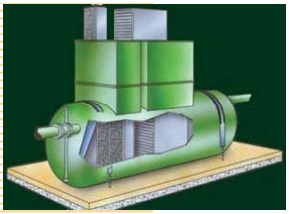
- Applicability
- Administrative Requirements
- Testing and Inspections

Underground Storage Tank Regulations

- Rule was readopted April 20, 2003
- Regulates:
  - Heating oil USTs in excess of 2,000 gallons, or aggregate volumes in excess of 2,000 gallons
  - USTs containing motor fuels, waste oil or chemical substances in any volume

Underground Storage Tank Regulations

- Oil/Water separators are considered a flow through process and not regulated **UNLESS**
- There is a separate stand-alone underground storage tank for the storage of the oil fraction
  - The storage tank would be regulated as a waste oil storage tank



EJIF

Administrative Requirements

- Must be registered with NJDEP – UST Facility Questionnaire (USTFQ) and $100
- USTFQ must be recertified annually and renewed every 3 years with $100 fee
- Must demonstrate proof of financial responsibility
  - EJIF or other environmental insurance
- USTFQ information must be the same as the Certificate of Insurance

EJIF

Construction Requirements

- Regulated USTs must contain:
  - Corrosion protection (tank and piping)
  - Release Detection Monitoring (tank and piping) (excludes emergency generator tanks and European Safe Suction Piping)
  - Spill Prevention
  - Overfill Prevention

Important Exemptions

- Sumps
  - Defined as a pit or reservoir designed to collect or contain a regulated substance for no more than 48 hours
    - Typically found in emergency decontamination areas, pesticide storage structures
  - Sumps are subject to subsections 2, 3, 4.1(a), 4.1(e) through (l), 4.2, 5.2 through 5.7, 7 and 8
  - In summary, sumps are not applicable to spill and overfill protection, leak detection monitoring, fill port marking

Important Exemptions

- Emergency Generator USTs
  - Tanks that are part of an emergency generator system used to store motor fuel solely for use by the emergency power generators are exempt from the requirement of subchapter 7:14B-6 (i.e. Release Detection Requirements)
  - NJDEP is reportedly considering amending this section of the rule

Important Exemptions

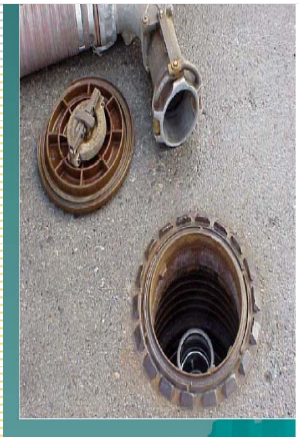
- Spill and Overfill Prevention Equipment
  - Tanks filled by transfers of no more than 25 gallons at one time are exempt from having spill buckets and overfill protection devices
  - This typically applies to waste oil collection tanks

Inspection and Testing Requirements – Leak Detection

- Petroleum USTs– Monthly leak detection documentation (weekly for manual tank gauging (550 gals. or less))
- Chemical USTs– Monthly leak detection
- Pressurized Piping– automatic line leak detectors and, annual line tightness test or monthly monitoring with an approved method (e.g. vapor/groundwater monitoring, interstitial monitoring)
  - Automatic line leak detectors are also required to be tested annually to ensure proper function
- Suction Piping – line tightness test every 3 years or monthly monitoring (e.g. vapor/groundwater monitoring, interstitial monitoring)
- Supply/Return Piping – monthly leak detection or tightness test every 3 years and water presence for each delivery
- No monitoring is required for European or Safe Suction Piping where piping is sloped back to tank and one check valve is located as close as possible to the suction pump

Inspection and Testing Requirements – Corrosion and Spill Protection

- Corrosion Protection Systems
  - Cathodic Protection – Tested 1/3 years
  - Impressed Current – Tested 1/3 years and inspected every 60 days
- Spill buckets, sumps and dispenser pans – Inspected monthly for liquid, debris and to verify integrity. Spill buckets must also be inspected prior to deliveries
- ALL TESTING MUST BE PERFORMED BY NJDEP CERTIFIED FIRMS AND INDIVIDUALS
- ALL INSPECTIONS MUST BE LOGGED AND KEPT ON-SITE

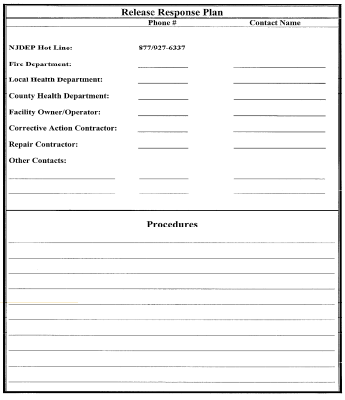


Spill Bucket

Tank Sump

Dispenser Sump/Pan

Release Response Plans



Release Response Plan

	Phone #	Contact Name
NJDEP Hot Line:	877/927-6337	
Fire Department:		
Local Health Department:		
County Health Department:		
Facility Owner/Operator:		
Corrective Action Contractor:		
Repair Contractor:		
Other Contacts:		

Procedures

- Must be posted in a prominent location on-site
- Must detail procedures to address alarms, malfunction, spills, or other emergencies
- Must include a site plan depicting locations of all USTs

Overfill Protection

- Overfill Prevention Equipment Must:
  - Automatically shut off flow at 95% full; or
  - Restrict flow or trigger a high level alarm at 90% full; or
  - Restrict flow 30 minutes prior to overfilling, alert the operator with a high level alarm one minute before overfilling, or automatically shut off flow into the tank so that no fittings above the tank top are exposed to product due to overfilling
- High level alarms must be audible or visible to the fuel delivery personnel while located at the fill port of the UST

EJIF

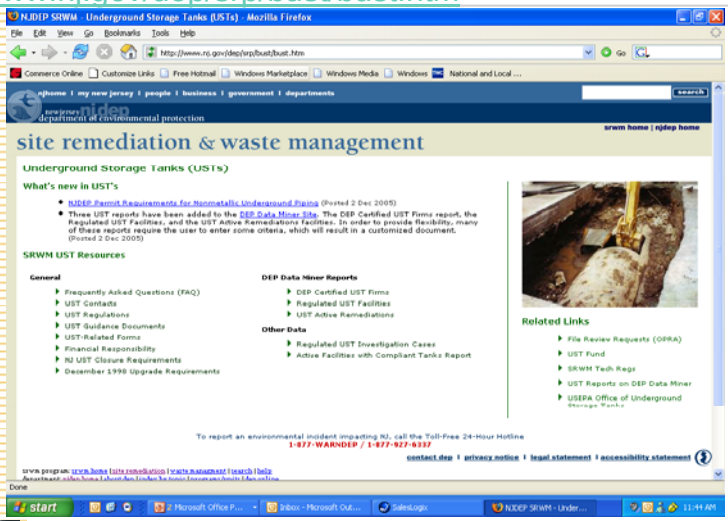
EJIF UST Insurance Coverage

- UST coverage is not automatic, but conditional
- All recommendations for insurance coverage are issued by PMK Group
- Regulated tanks must comply with N.J.A.C. 7:14B for construction and maintained in accordance with the same
- Non regulated USTs (i.e. heating oil tanks) less than 15 years old are provided coverage, but must be approved by PMK
- Non regulated USTs greater than 15 years old must provide a positive integrity test to PMK and complete annual testing thereafter

EJIF

Need Additional Info…

http://www.nj.gov/dep/srp/bust/bust.htm



Questions?

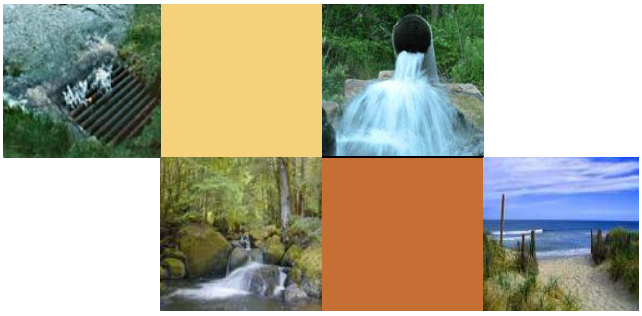
Richard Erickson
rerickson@pmkgroup.com

Chris Gulics
cgulics@pmkgroup.com

Matthew Mee
mmee@pmkgroup.com

1-800-879-6681

SPILL PREVENTION CONTROL AND COUNTERMEASURE



PRESENTED BY:

PMK Group
CONSULTING & ENVIRONMENTAL ENGINEERS
SERVICE SOLUTIONS SATISFACTION

Spill Prevention Control and Countermeasure

- Applies to owners or operators of facilities that drill, produce, gather, **store**, **use**, process, refine, transfer, distribute, or **consume** oil and oil products.
- Regulates the aboveground storage of oils in excess of 1,320 gallons stored in containers 55 gallons and greater
- Must have route to navigable waters or ability to migrate off-site

EQJIF

SPCC

Includes…

- Aboveground Storage Tanks
- Mobile fueling tanks
- Wet Transformers
- Drums
- Generator Sub-base Tanks
- Equipment with Oil Reservoirs (i.e. hydraulic fluid)
- Etc.

SPCC

Section 112.1(d)(6)—Wastewater Treatment Facility Exemption

… if a wastewater facility or part thereof is used for the purpose of storing oil, then there is no exemption, and its capacity must be counted as part of the storage capacity of the facility… At permitted wastewater treatment facilities, storage capacity includes bulk storage containers, hydraulic equipment associated with the treatment process, containers used to store oil which feed an emergency generator associated with wastewater treatment…

SPCC

December 2006 Amendments

- Effective February 26, 2007
- Streamlines requirements for:
  - "Qualified Facilities" with an oil storage capacity of 10,000 gallons or less
  - Oil Filled operational equipment
  - Mobile Re-Fuelers
- Clarifies Motive Power Containers

Qualified Facilities

- 10,000 gallons or less in aggregate aboveground oil storage, and
- For 3 yrs prior to Plan certification or since becoming subject to rule if operated for less than 3 yrs – MUST NOT HAVE HAD:
  - A single discharge to navigable waters exceeding 1,000 gallons, or
  - Two discharges to navigable waters each exceeding 42 gallons within a 12 mo. period

Qualified Facilities

- May prepare a self certified plan without P.E. certification as long as the plan:
  - Does not deviate from rule
  - Does not use environmental equivalent measures
  - Does not make impractability determinations

Alternative Integrity Testing Requirements for Qualified Facilities

- Test and inspect ASTs on regular schedule and when repairs are made
- Facilities can determine (in accordance with industry standards):
  - Qualifications for personnel performing testing and inspection
  - Frequency and type of testing and inspections
  - No longer requires both visual inspection and another testing method

Alternative Security Requirements for Qualified Facilities

- To prevent acts of vandalism and assist in discovery of oil discharges, facilities must describe:
  - Control of access to oil storage areas
  - Prevention of unauthorized access to oil pump starter controls
  - The appropriateness of security lighting

Oil Filled Operational Equipment

- Container must support the operation of the equipment
- Examples include transformers, hydraulic pumps, gear boxes, etc.
- Must meet same eligibility criteria as " Qualified Facilities"
- Can prepare:
  - oil spill contingency plan (avail @ epa.gov/oilspill)
  - written commitment of manpower, equipment and materials to respond to a spill
  - inspection or monitoring program to detect equipment failure or a discharge

Mobile Re-Fuelers

- Bulk storage container onboard a vehicle or towed that is designed or used solely to store and transfer oil
- No longer requires *sized* secondary containment
- General secondary containment requirements still apply

Motive Power Containers

- Onboard bulk storage container used to power the movement of a motor vehicle
- Exempt from the SPCC Rule
- Transfer of oil to these containers is still an applicable activity

Need Additional Info…

http://www.epa.gov/oilspill/spcc.htm