

NEW JERSEY ENVIRONMENTAL RISK MANAGEMENT FUND (EJIF) NEW JERSEY UTILITIES AUTHORITIES

SPILL PREVENTION AND CONTROL PREPAREDNESS SPCC TRAINING

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SPCC Presentation Overview

- Plan Description and Objectives
- Regulatory Background
- Facility Description
- Organizational Structure and Responsibilities
- Release Prevention and Response
- Spill Control and Countermeasure

PLAN DESCRIPTION & OBJECTIVES

What is SPCC?

Spill

Prevention

Control &

Countermeasure

Preventing spills:

- Equipment Maintenance
- Inspections
- Secondary Containment
- Petroleum Handling
- Procedures

What is SPCC?

Spill

Prevention

Control &

Countermeasure

Controlling spills:

- Spill Response
- Containment
- Notification to proper authorities and agencies
- Clean-up

Plan Objectives

- Prevent and control accidental discharges of oil to navigable waterways
- Minimize and abate potential for human health and environmental impacts through accidental release of oil
- Outline response and reporting procedures to be followed in event of a release of oil
- Updates???



REGULATORY BACKGROUND

Cuyahoga River (Cleveland, OH) – The River That Caught Fire, 1969



Cuyahoga River – The River that Caught Fire

- NOT the first fire along the Cuyahoga River
 - Nine fires between 1868-1952

Cuyahoga River (Cleveland, OH) – The River That Caught Fire, 1969



Cuyahoga River (Cleveland, OH) – The River That Caught Fire, 1969



Santa Barbara Oil Spill, 1969

- January 28, 1969 – three million gallons of oil spilled into the Pacific Ocean

Santa Barbara Oil Spill, 1969



Santa Barbara Oil Spill, 1969



Applicable Regulations & Guidance

- July 9, 1970 – U.S. EPA proposed regulation (Nixon)
- December 2, 1970 – regulation takes effect
- 1972 – Federal Water Pollution Control Act (Clean Water Act)

“The goal of this regulation is to prevent oil from reaching navigable waters and adjoining shorelines, and to contain discharges of oil. The regulation requires these facilities to develop and implement Spill Prevention, Control, and Countermeasure (SPCC) Plans and establishes procedures, methods, and equipment requirements (Subparts A, B, and C).”

Applicable Regulations & Guidance

- 1990 - federal (EPA) Oil Pollution Prevention (SPCC rule)
- 1976 NJDEP – Spill Compensation and Control Act (N.J.S.A. 58:10-23.11)

Who Is Covered?

Any facility with oil storage capacity of:

Aboveground

>1,320 gallons in containers 55 gallons (standard drum) or larger in size

OR

Underground

>42,000 gallons



Who Is Covered ? - Applicability

AND:

“which due to its location, could reasonably be expected to discharge oil in quantities that may be harmful, as described in part 110 of this chapter, into or upon the navigable waters of the United States or adjoining shorelines...”

– Huh?? What.....????

Who Is Covered ? - Applicability

Navigable Waters:

(1) All navigable waters of the United States, as defined in judicial decisions prior to the passage of the 1972 Amendments to the FWPCA (Pub. L. 92-500), and tributaries of such waters;

(2) Interstate waters;

Who Is Covered ? - Applicability

Navigable Waters:

(3) Intrastate lakes, rivers, and streams which are utilized by interstate travelers for recreational or other purposes; and

(4) Intrastate lakes, rivers, and streams from which fish or shellfish are taken and sold in interstate commerce.

Who Is Covered ? - Applicability

“Quantities that may be harmful”:

- Causes a sheen or discoloration on the surface of the water or adjoining shorelines;
- Causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines; or
- Violates an applicable water quality standard.

What is Oil?

According to EPA:

- Fats, oils, greases of animal origin
- Vegetable oils from seeds, nuts, fruits, or kernels
- Other oils and greases (petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse,
- or oil mixed with wastes other than dredged spoil



Oil Storage

Typical Public Works Garage/Water Treatment Facility

- Diesel (emergency generators)
- Heating oil
- Mineral oils (transformers and switches)
- Hydraulic oil (elevators)
- Waste oil
- Used cooking oil

What Do I Need to Do?

Three basic parts:

- Written plan
- Site preparation and equipment
- Personnel and training

WRITTEN PLANS

Written Plans

Three types of basic plans:

- Tier 1 Qualified Plans
- Tier 2 Qualified Plans
- Full Professional Engineered Certified Plans

Tier 1 Qualified Plans

Tier 1 Qualified Facility

- At least 1,320 gallons (but less than 10,000 gallons) of any type of oil or petroleum product on-site in aboveground storage tanks
- All aboveground tanks are <5,000 gallons
- Cannot have a single discharge of oil greater than 1,000 gallons, or two discharges of oil each greater than 42 gallons within any 12-month period
- Can self-certify
- EPA provides a free template: <https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/tier-i-qualified-facility-spcc-plan-template#Tier%20I%20SPCC%20Template>

Tier 2 Qualified Plans

Tier 2 Qualified Facility

- Has at least 1,320 gallons but less than 10,000-gallons of any type of oil or petroleum product on-site in aboveground storage tanks
- Can have an aboveground tank larger than 5,000-gallons
- Cannot have a single discharge of oil greater than 1,000 gallons, or two discharges of oil each greater than 42 gallons within any 12-month period
- Can self-certify

Full Professional Engineered Certified Plans

Full Professional Engineered Certified Plans

- >10,000-gallons of any type of oil or petroleum product on-site
- No limit on aboveground tank sizes
- Certified by a Professional Engineer (PE)

Written Plans

Organizational Structure and Responsibilities



Spill Abatement, Repair, and Notification

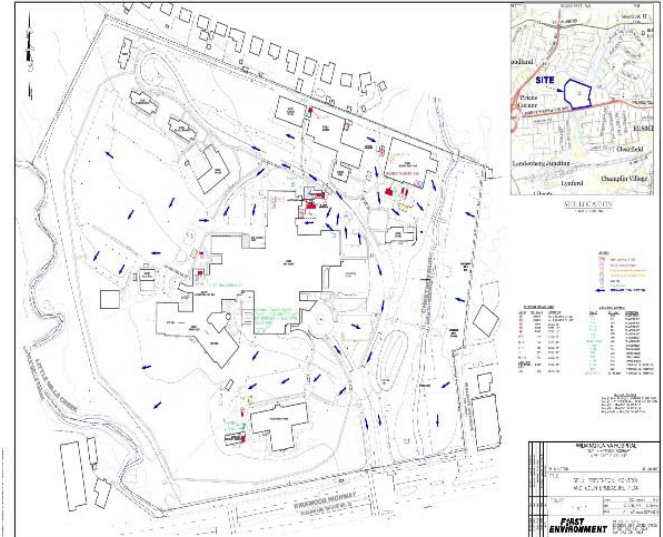
Manager Responsibilities

- Oversees necessary submittals and reports to regulatory authorities
- Audits facility conformance with SPCC plan
- Conducts annual review of SPCC plan and initiates revisions, if necessary
- Coordinates waste disposal activities
- Coordinates SPCC training to ensure effective implementation of the plan

Petroleum Storage Locations

Need a site plan showing location of:

- Storage tanks
- Oil drums (55 gallon and larger)
- Transformers
- Other petroleum sources (>55 gal)



Inspection and Monitoring Program

Monthly inspections for:

- Oil-filled equipment
- Storage tanks (ASTs and USTs)
- Appurtenances, piping, and containment areas
- Property damage or leakage
- Stained or discolored soils
- Veeder-Root test



START IN-TANK LEAK TEST
TEST BY PROGRAMMED TIME
JUN 20, 2011 12:00 AM

TEST LENGTH 4 HOURS

T 1:BLDG 19 GEN.TANK
VOLUME = 2050 GALS
ULLAGE = 450 GALS
90% ULLAGE= 200 GALS
TC VOLUME = 2047 GALS
HEIGHT = 48.91 INCHES
WATER VOL = 7 GALS
WATER = 0.96 INCHES
TEMP = 62.7 DEG F

***** END *****

Inspection & Monitoring Program



- Excessive accumulation of water or debris in containment areas (records should indicate whether oil was present in accumulated rainwater)
- Catch basins for sediment-related clogging



Monthly Inspection Checklist

[illegible]

EPA has a sample monthly checklist you can copy here:

https://www.epa.gov/sites/production/files/2014-07/documents/onshore_production_checklist_june_2014_for_web.pdf

Substantial Harm Criteria

ATTACHMENT C-II-CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

FACILITY NAME: _____

FACILITY ADDRESS: _____

1. Does the facility have an oil storage capacity that is greater than or equal to 42,000 gallons and conduct operations that include over-water transfers to or from vessels?
☐ Yes
☐ No *proceed to questions below*
2. Does the facility have an oil storage capacity greater than or equal to one million gallons **and** does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation with any aboveground storage area
☐ Yes
☐ No *proceed to next question*
3. Does the facility have an oil storage capacity greater than or equal to one million gallons **and** is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula 1) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DCC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 13, for availability) and the applicable Area Contingency Plan.
☐ Yes
☐ No *proceed to next question*
4. Does the facility have an oil storage capacity greater than or equal to one million gallons **and** is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula 1) such that a discharge from the facility would shut down a public drinking water intake?
☐ Yes
☐ No *proceed to next question*
5. Does the facility have an oil storage capacity greater than or equal to one million gallons **and** has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?
☐ Yes
☐ No *proceed to next question*

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature _____

Name (please type or print) _____

Title _____

Date _____

Footnotes:

1. If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.
2. For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

EPA requires a “Certification of the Applicability of Substantial Harm Criteria”

A copy can be found:

https://www.epa.gov/sites/production/files/2014-05/documents/attachment_c-ii_certification_of_substantial_harm.pdf

SITE PREPARATION & EQUIPMENT

Release Prevention & Response



- Concrete pads surrounding oil-filled operational equipment provide adequate release identification with regular inspections
- Regulated USTs meet minimum requirements for secondary containment, overfill prevention, and release detection

Release Prevention & Response

Secondary containment for ASTs



Release Prevention & Response

Secondary containment for ASTs



Release Prevention & Response

Oil transfer area preparation



Release Prevention & Response

Oil transfer area preparation – NOT!



Release Prevention & Response

Secondarily contained ASTs can also have leak detection monitoring



Release Prevention & Response

Drum storage area



Release Prevention & Response

Spill clean up equipment



Release Prevention & Response

- Routine maintenance and inspections of all operations and installations
- Include inspection, replacement or repair of:
 - Pumps
 - Seals
 - Gaskets
 - Valves
 - Monitoring instrumentation
 - Alarms



PERSONNEL & TRAINING

Facility Security

- Keep all valves that may drain or discharge oil in a closed position and locked when not in use
- Lock all starter controls on pumps in the “off” position and make accessible only to authorized personnel
- Provide adequate lighting for nighttime operations and to prevent vandalism



Oil Transfer Operations

- Only trained personnel conduct transfer of materials to and from oil storage tanks
- Terminal connections should be capped when not in use
- ASTs labeled with storage tank ID, contents, and tank capacity (excludes electrical equipment)
- Spill containers require 30-day inspections



SPILL CONTROL & COUNTERMEASURES

Emergency Spill Abatement

- Emergency spill abatement is triggered by a fire, explosion, or release of 10 gallons of oil or greater
- Local fire department/emergency response contractors take lead role in characterization, source identification, release investigation, and hazard assessment
- Initiate necessary containment measures
- Safety office to provide re-entry assessment

Emergency Spill Abatement

- Notify NJDEP/Local Hazmat (911) authorities concerning a release, fire, or explosion which would threaten human health or the environment
- Internal and external communications and alarms
- Evacuation plan

Individual Identifying an Oil Spill or Release

- If possible, begin activities to stop the source of the release
- Call 911/designated number to initiate spill notification and abatement activities or receive additional instruction
- Initiate containment and cleanup activities if properly trained



Individual Identifying an Oil Spill or Release

Be prepared to identify the following:

- Time and location of incident
- Nature of materials or wastes involved
- Cause of release
- Possible hazards to human health and environment
- Estimated quantity of materials or wastes spilled
- Implemented containment efforts
- Extent of injuries, if any

Non-Emergency Spill Abatement

- Releases <10 gallons that do not reach navigable waters
 - Clean up using internal resources
- Abatement
 - Address with trained personnel based on previous experience and familiarity with spilled material
- Health and safety concerns
- Request assistance from additional internal parties (e.g., emergency response companies)



Spill Containment

If you are trained:

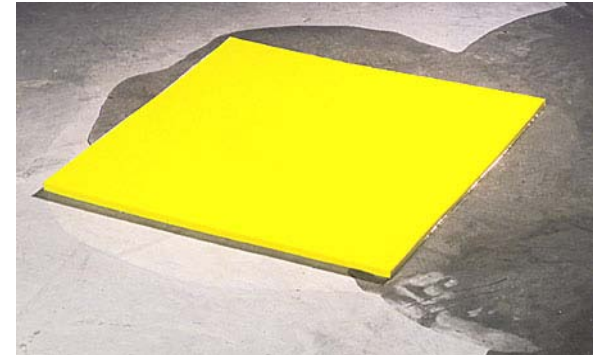
Begin spill containment

- Assess the situation
- Alert area personnel
- Check the MSDSs as needed
- Ventilate area and control ignition sources



Spill Containment

- Use available spill clean-up materials
- Protect surrounding ground surfaces and drains
- Ensure personnel are decontaminated as needed



Spill Containment

- Notify your supervisor immediately if spill has reached any storm drains
- Recover spilled materials to extent possible using available materials
- Cleanup and stage spill residue in new 55 gallon drum(s)



Good Oil Handling and Storage Practices

- Portable containers stored on spill pallets or in diked areas
- All storage containers labeled appropriately (including gas/oil mixtures)
- Drum lids and caps are in place and secured when container is not in use
- Drum spacing allows for easy inspections of containers
- Older product no longer used is discarded or recycled



Good Oil Handling and Storage Practices

- All storage containers are in good condition
- Drip pans are used as needed and emptied after use
- Location of storm and building drains are considered when conducting work or storing material



Bad Oil Handling and Storage Practices

- Materials stored in the wrong place
- Spill prevention equipment not maintained



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Bad Oil Handling and Storage Practices



Bad Oil Handling and Storage Practices



Bad Oil Handling and Storage Practices



Updates??

- New Presidential Administration – reduced role for EPA? Reduced enforcement?

Updates??

- New Jersey – REAL (Resilient Environments and Landscapes) and NJPACT (Protecting against Climate Change January 2020)
 - Increased protection against future flood inundation and damage from sea level rise and extreme storm events
 - Protecting critical facilities and infrastructure from the effects of climate change
 - Restoring water quality and reducing flooding across the state but especially in urbanized areas
 - Increased resilience of land and water resources
 - Planning for climate change
 - Designing with nature using nature-based solutions
 - Encouraging renewable energy
 - Administrative process improvements

Updates??

- First Environment will provide to you a training certificate for your annual SPCC training if requested at no charge. Please provide to Matt Genna your name and the name of your facility, and we will send out PDF certificates for you to include in your SPCC plan.

Additional Resources

- **EPA - A Facility Owner/Operator's Guide to Oil Pollution Prevention:** <https://www.epa.gov/sites/production/files/documents/spccbbluebroch.pdf>
- **EPA - SPCC Guidance for Regional Inspectors:** <https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/spcc-guidance-regional-inspectors>
- **EPA - SPCC Basics Presentation:** https://www.epa.gov/sites/production/files/2014-05/documents/spcc_basics.pdf
- This presentation will be available on the EJIF Website shortly!
<http://njejif.org/>

QUESTIONS?

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