

January 21, 2008

## **SPECIAL NOTICE: OIL SPCC PLANS**

In 2002 the U.S. EPA issued major revisions to the regulation for Oil Spill Prevention (SPCC) Plans. Since then the EPA has postponed the deadline four times, and proposed many small changes.

**Oil SPCC Plans are required if a facility exceeds a threshold of 1,320 gallons of oil in aboveground containers and equipment.**

- When calculating the maximum oil capacity, the maximum container shell capacity must be used not the actual oil volume.
- Containers with capacity of less than 55 gallons are excluded from calculating the threshold.
- Oil is broadly defined in this regulation to include fuel oil, synthetic oil, gasoline, mineral spirits, used oils, cutting oils and lubricants that are derived from petroleum; and oils that are derived from animals, vegetables or fish.
- Discharging to a sanitary or combined sewer system does not exempt a facility.

In summary, the following changes are important:

- **A new compliance deadline of July 1, 2009, for both updating and implementing the Oil SPCC Plan.**
- Facilities with less than 10,000 gallons of oil (total shell capacity in all containers) can self-certify the Oil SPCC. However, the self-certified plan will have less rule flexibility and the facility must meet specific criteria.
- Oil-filled operational equipment will, in some cases, be able to avoid the requirement for secondary containment and instead provide alternative controls.
- The tank integrity inspection requirement has been relaxed.
- Additional rule changes were proposed October 1, 2007.

The EPA emphasizes that facilities must still comply with the previous requirements for Oil SPCC plans. If you are required to have a plan, then you must continue to implement that plan and review and update it every five years.

**Please call us today at (847) 288-5355, to schedule an assessment of your need for an Oil SPCC Plan.** Or e-mail me at [Phil@admiralenv.com](mailto:Phil@admiralenv.com). Our staff includes experienced professional engineers that are qualified to prepare and certify your SPCC Plans.

Philip A Twomey, P.E.  
President

PS: For more information, the EPA web site for this is:  
<http://www.epa.gov/emergencies/content/spcc/index.htm>