

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE (SPCC) PLAN FREQUENTLY ASKED QUESTIONS -

What is an SPCC Plan?

A Spill Prevention, Control, and Countermeasure (SPCC) Plan is a comprehensive description of a facility's containment and countermeasures that would prevent an oil spill from occurring as well as procedures to respond to and clean up an oil spill that does occur. The SPCC Plan addresses the following three areas:

- **Preventive** operating procedures that prevent oil spills.
- **Control** measures to prevent a spill from reaching the environment.
- **Countermeasures** to contain, clean up, and mitigate the effects of an oil spill that reaches the environment.

Who must have an SPCC Plan?

EPA's Oil Pollution Prevention Regulations (40 CFR 112) promulgated under the Clean Water Act require SPCC Plans for non-transportation-related facility operations that could reasonably be expected to discharge oil into or upon the navigable waters of the U.S., and has a total aboveground storage capacity of 1,320 gallons or more of oil. "Oil" is defined by the EPA and the Clean Water Act to include petroleum and petroleum products, fuel oil, sludge, waste oil, vegetable oil, and animal oils. Penalties for not complying with these laws can be as high as \$25,000 per day per violation.

Why is Boise State University subject to this requirement?

Boise State University stores quantities of oil in excess of the threshold amounts contained in EPA's Oil Pollution Prevention Regulations and has buildings along waterways and outfalls on campus that drain directly without filtration to the Boise River.

How are operations at Boise State affected by the SPCC requirements?

Boise State University must maintain and implement the SPCC Plan, provide training for affected personnel, conduct routine inspections of oil-containing equipment and storage devices (i.e., tanks and containers), and implement and perform certain response procedures should a spill occur.

What information is necessary to complete an SPCC Plan?

Information needed includes: where and how oil is used and stored, preventative maintenance procedures, inspection procedures, and emergency response procedures such as who would be contacted if a spill were to occur and how it would be managed.

How is information for the SPCC Plan collected and maintained up-to-date?

Environmental Health, Safety and Sustainability has developed one SPCC Plan for the Boise State main campus and inventoried all quantities and locations. These profiles describe oil-containing equipment and storage devices such as:

- Storage tanks (underground and aboveground)
- Satellite accumulation area containers (used oil)
- Transformers
- Elevators
- Vehicles
- Cooking equipment
- Boilers and emergency generators

Who is required to be SPCC trained?

Responsible employees at the site shall become familiar with the contents of the Plan. The SPCC Coordinator shall be responsible for implementation of countermeasure response activities. EPA requires SPCC compliance training for personnel who have a role in the management of oil including delivery, maintenance, storage, disposal, or spill response. The SPCC Coordinator shall identify those personnel in their groups that require training and direct them to the on-line annual SPCC training and briefings. Personnel should be trained immediately upon hire or transfer to a position involved with oil management.

How often must the SPCC Plan be reviewed and, if necessary, amended?

The SPCC Plan must be reviewed at least once every five years and the review must be documented. The SPCC Plan must be amended whenever there is a change in the facility design, construction, operation, or maintenance that affects the facility's potential to discharge oil into the Boise River. In addition, the EPA may require amendments to the SPCC Plan if a facility discharges in excess of 1,000 gallons, or following two releases of 42 gallons or more within any twelve-month period. Amendments must be certified by a registered professional engineer.

What are the consequences for non-compliance with SPCC regulations?

Penalties for not complying with these laws can be as high as \$25,000 per day per violation. Specific violations include:

- Untrained personnel
- Failure to report a spill which releases to waterways
- Lack of an adequate SPCC Plan unique to the facility containing the following elements:

- 1) Identification of all oil storage and use locations and quantity of oil stored.
- 2) Written descriptions of any past spills including corrective action taken and plans for preventing a recurrence.
- 3) A description of containment, diversionary structures, or equipment to prevent a spill of oil from reaching waterways.
- 4) A complete discussion of the spill prevention and control measures applicable to the facility and its operations.
- 5) Operating procedures established to prevent spills from occurring.
- 6) Lack of adequate control measures to prevent a spill from reaching waterways.
- 7) Lack of adequately implemented procedures and countermeasures to contain, clean-up, and mitigate the effects of an oil spill that reaches waterways.