

Five Tips to Simplify Your Next SPCC Plan Review



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Are you coming up on the required five-year review/plan re-certification for your facility's Spill Prevention, Control, and Countermeasure (SPCC) Plan? Even if you've been through several cycles of performing five-year tune-ups on your SPCC Plan, you can make your next review easier and prepare yourself for future SPCC Plan re-certifications if you follow these five tips.

Start Early

Late renewals are a consistent pain point for many companies. To avoid being late with your next re-certification, start your review six months before your SPCC Plan is due for its five-year review. If you're conducting the review internally, start by identifying the person who will be conducting the review. If you're using a third party, this approach will help you go through the proposal/contracting process, so you are ready to conduct the actual review and complete the re-certification before the Plan expires.

Simplify Data Collection

One of the keys to a compliant SPCC Plan is to collect accurate data in the field about your facility's oil sources. Streamlined data collection is especially important if you have a large facility or your oil storage changes regularly. The key to simplifying data collection is to make sure your reviewer has organized information to evaluate the compliance aspects of each oil source. Accurate data collection can limit the follow-up required from plan preparers to verify information as well as limit the potential for discrepancies. This is especially helpful if your Plan is being audited by a third party or reviewed during an EPA inspection.

Reduce Redundancy with a Summary Table

One way to simplify your Plan is to use an oil source summary table to cover as much information as possible. A table can cover each oil source and the aspects of how the oil source is compliant with the SPCC Rule. There may be areas in the Plan where you need to provide additional text discussion regarding oil sources to explain a compliance matter. In general, try to avoid duplicating information within the Plan.

Watch Out for Commonly Overlooked Areas

While secondary containment and overfill protection are key elements to review at each oil source, some reviewers forget to measure the size of containment structures. Dimensions need to be carefully measured in the field to verify and show sufficient secondary containment capacity in your facility's SPCC Plan.

Another commonly overlooked area is facility drainage. Specifically the overland flow in the proximity of individual oil sources, which is key to determining the potential receptors where spilled product can travel. These receptors could be storm sewers, ditches, wetlands, or waterways. You can discuss the protection of these receptors during your facility's annual SPCC training. Swift action and concise communication during a spill can help limit your liability.

Use Targeted Annual Training

Many companies struggle to comply with the annual training requirement. One of the tripping points is trying to train all "oil-handling" employees. To avoid this pitfall, implement a tiered training program so you can focus the training content on an employee's responsibility level.

Spill recognition and notification through proper internal channels to get a spill cleaned up is a key message for employees who occasionally handle oil. These employees also could be trained to aid with the initial control and response to a spill. A second tier may include team members who manage the SPCC Plan. They have additional responsibilities such as inspections on oil sources and spill reporting.

Follow these tips to save time and money on the next five-year update of your facility's SPCC Plan.

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