

Upgrade Your Facility's Spill Contingency Planning



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Suppose that you learn from one of your employees of a 75-gallon used oil spill that is heading toward a ditch or storm drain on your property. You have an existing spill contingency plan or Spill Prevention Control and Countermeasure (SPCC) Plan in place for the facility, but do you really feel confident that your team will proactively respond to the spill to limit your company's liability?

When I press my clients on having the proper tools for spill preparedness in recent years, their feedback suggests that – both industry and public – the sector as a whole could use improved tools to help them be better prepared for a spill. More often, I am providing enhanced/more graphic add-ons as attachments to a spill/spill contingency plan that can really help my clients be better prepared to navigate their facility through a spill efficiently and effectively.

When starting to assess your facility's most efficient means to upgrade spill preparedness tools, start with potential regulatory obligations. In general, the regulations are set up with varying levels of required preparedness.

For example, if your facility contains more than 1,000,000 gallons of aboveground oil/fuel products, then your facility falls into a category of the SPCC regulation that requires a Facility Response Plan, which has several additional requirements in comparison to a standard SPCC Plan. For the printing industry, most facilities fall closer to the SPCC threshold of 1,320 gallons.

If you are below 1,320 gallons of aboveground oil/fuel storage, I recommend a SPCC applicability memo and/or spill contingency plan, to which you could choose to add some very basic spill preparedness tools. The minimum tools I recommend to my clients are a spill incident report form, a spill response flow chart (that could be posted near key storage areas at the facility), a notice of oil/fuel transfer requirements for vendors, and internal notification procedures for a potential release to the environment.

For facilities above 1,320 gallons of aboveground oil/fuel storage, an SPCC Plan is required. There are SPCC regulatory requirements related to spill preparedness. Most notably the preparedness is covered with an annual training session and documenting response or countermeasures within the plan document.

For more information about spill contingency planning, attend GLGA's FREE member webinar on November 1, 2018.

While a mock spill training drill as part of the annual training session is a good means to prepare your employees, we are taking more aspects from these plan documents that can be duplicated, laminated, and placed a key areas around the facility. In today's world, having information at your fingertips is becoming more essential. In the SPCC world, this means having fewer words, relying more on graphics and visual aids on how to properly handle the initial steps in a spill scenario.

Spill contingency planning also is required under the Resource Conservation and Recovery Act (RCRA) for large quantity generators of hazardous waste. A large quantity generator is a facility that generates about 4 drums of hazardous waste each month. State and federal regulations define the specific spill contingency plan requirements.

Under RCRA, these contingency plans are focused on minimizing the hazards to human health or the environment from fires, explosions, or chemical releases. RCRA Contingency Plans are required to be submitted to local emergency response agencies including the fire department, law enforcement, and local hospitals, so they can be prepared for situations that could potentially arise at your facility.

I like to challenge my clients to think critically about how their facility could be best prepared to navigate a spill response process by asking good questions. Using this information, a facility's spill contingency plan can be tailored to best serve that particular facility while meeting the necessary regulatory requirements. Each facility is different so the best means of preparedness should fit the operational structure and practices of the facility to ultimately limit your facility's potential vulnerability during a spill.

Chris Jimieson has more than 19 years of experience helping industrial, commercial, military, federal, state, municipal, and solid waste companies with environmental compliance. Chris has extensive experience helping printing companies with SPCC projects and manages compliance projects providing computer-based training (CBT) modules to meet clients' employee compliance training needs. Contact Chris at (608) 216-7367 or cjimieson@scsengineers.com.