

Five Steps to More Efficient and Lower Stress SPCC Inspections



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There is no other aspect of your facility's Spill Prevention, Control and Countermeasure (SPCC) Plan that you will interface with more than the inspection forms. Industry guidance for most containers recommends you inspect them on a monthly and annual basis, which equals 13 sets of inspection forms per year.

Inspecting your oil sources is not only a code requirement if you have an SPCC Plan, it is your facility's opportunity to identify deficiencies before they become a larger problem. Inspection forms that are user friendly and help guide you through the inspection process will help to focus an inspector's attention during the process to find deficiencies. By following the below five steps, you can achieve a more efficient and lower stress SPCC inspection program.

Step 1

The most important step is to start by setting aside upfront time to discuss the inspection forms with your consultant or plan preparer during your next SPCC Plan review or initial inspection for a new facility.

"Customizing your inspection forms ... could save your facility's inspectors hours of time and frustration."

By setting aside 15 to 30 minutes, you can discuss several of the details in the four remaining steps that will save your staff time and frustration when conducting

the inspections of your facility's oil sources.

Step 2

Upon setting aside planning time, you can start by discussing the inspection form layout. This discussion should uncover the format that will best fit your facility. The SPCC Rule (40 CFR Part 112) requires that inspections follow industry guidance, and the guidance applicable to most containers is the Steel Tank Institute's (STI) SP001 guidance. The most recent version of this guidance was released in 2018.

While the SP001 guidance provides example inspection forms, these forms generate multiple pages per oil source per month. Most facilities have multiple oil sources; so, a single monthly inspection

could generate dozens of pages of inspection forms if the SP001 inspection forms are used. Ask your plan preparer to build comparable forms that still meet the inspection criteria of SP001, while only using a one or two page form covering each of your facility's oil sources for your entire monthly inspection.

Step 3

Subsequently, discuss the question format and form instructions that best fit your facility. While the SP001 guidance provides specific criteria to consider for questions, you have the flexibility to provide input on how to frame the criteria to fit your facility's inspection/documentation practices.

SP001's example inspection forms are set up for potential responses to questions to be yes, no, or not applicable. You may prefer using the same criteria in a pass/fail format. Again, this format works best for single sources; however, it offers a bit more flexibility to include multiple sources on a single form.

For many facilities with a number of different oil/fuel sources, the preferred format is one using a single yes/no checkbox, which can open the potential to show all 12 months on a single monthly inspection form. The checkbox can trigger either a yes or no response. It is important that the instructions on the top of the inspection form indicate the desired result. The inspection form instructions correlate to the approach chosen so that the inspector can clearly communicate to management where corrective actions are needed, if necessary.

Step 4

Another efficiency tactic is to have your consultant or plan preparer shade the boxes connected to criteria that is not applicable for the different oil sources (see Figure 1). This approach can save inspectors time reviewing questions that might not apply to individual oil sources each month. When looking at the SP001 monthly inspection form criteria, there are 18 questions per oil source. For certain oil storage containers, it is possible that only five to ten of those questions are applicable. The potential for time savings over the course of a typical 5-year span for an SPCC Plan is substantial.

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Step 5

Lastly, in terms of inspection tracking and documentation, it is important to think about how you intend to make sure the inspections are being completed correctly, by the established deadlines, and that inspection records are being kept on file for a minimum of 3 years in accordance with the SPCC Rule. The completion of inspection forms could be in the form of traditional hard copy inspection forms, or, as we continue to move into a digital world, more options are becoming available for conducting inspections and maintaining records electronically. We recommend discussing this information to your SPCC plan preparer; so, that the forms can be developed to be compatible with your facility's preferred approach.

For as little as 15 minutes on the planning side in terms of customizing your SPCC inspection forms, you could save your facility's inspectors hours of time and frustration within the inspection process during your facility's next 5-year SPCC review inspection.

Chris Jimieson has more than 20 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, managing compliance projects, and providing computer-based training (CBT) modules to meet clients' employee compliance training needs. Contact Chris at SCS Engineers (608) 216-7367, cjimieson@scsengineers.com.

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| Ladder/platform/walkway structure for tank system is secure and shows no signs of severe corrosion or damage. | | |
| The containment structure does not have excess liquid, debris, cracks, corrosion, erosion, fire hazards, or integrity issues. | | |
| The containment drain valves are closed and are functioning correctly. | | |
| Containment structure egress pathways are not blocked and gates/doors are operable. | | |
| There are no other site conditions that need to be addressed at this time for the continued safe operation or that may affect this SPCC Plan. | | |

Figure 1. Shows SP001 criteria with example shading of criteria not applicable to certain oil sources.



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