10 Common Spill Prevention, Control, and Countermeasure (SPCC) Violations

Spill Prevention, Control, and Countermeasure (SPCC) Regulation was originally published in 1973 and went through major revisions since then. It is currently undergoing rulemaking to include hazardous substances. Review the following 10 common SPCC Plan violations issued by EPA and evaluate if your facility is inspection ready:

1. Plan not certified by a professional engineer (PE)
2. No evidence of 5-year review of the Plan
3. Amendments to the Plan not certified by a professional engineer
4. Plan does not follow sequence of the rule and/or cross-reference table not included in the plan
5. Plan has inadequate or no facility diagram
6. Plan has inadequate or no description of the drainage controls
7. Plan has inadequate or no description of countermeasures for discharge discovery, response, and cleanup
8. Plan has no contact list and phone numbers for response and reporting discharges
9. Plan has inadequate or no information and procedures for reporting a discharge
10. Plan does not discuss and facility does not implement appropriate containment/diversionary structures/equipment (including truck transfer areas)

It is recommended that the facility review its existing SPCC Program for compliance with the regulations and make changes to its plan, if needed.

Contact Sam Joshi at (267) 513-1898 if you have any questions.

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