

Leave the Storage Wars for Reality TV

Spill Prevention Control and Countermeasure



The Certified Auto Recyclers program has so much compliance assistance to offer! The CAR standards, laid out in a straightforward manner, are based on meeting regulatory responsibility. The CAR standards are easy to understand and easy to track with the new online system.

Storage issues can be made simple by following the CAR Standards

Spill Prevention Control and Countermeasures (SPCC)

If an auto recycling site has more than 1,320 gallon of on-site storage capacity for petroleum products a *Spill Prevention Control and Countermeasure (SPCC)* plan must be written and implemented including regularly logged inspections. [Document Verification Required](#) for CAR certification.

Storage capacity means the size of all tanks, drum and totes that are full, partially full and empty that are available to house petroleum products such as used oil, gasoline, diesel, new oil, transmission fluid, brake fluid, power steering fluid (all in new or used condition) and petroleum-based parts cleaning solvent, not the volume of fluid on hand. But only container 55-gallon and larger are counted in the total capacity. If the facility has less than 1,320 gallons of storage, then no SPCC is required.

Changes to the SPCC rules allow facilities with less than 10,000 gallons of on-site storage capacity to self-prepare a written spill prevention plan. The new rules are less stringent but have also created a sense of urgency. SPCC is codified under 40 CFR 112.

A **Tank Inventory** is an excellent way to get a good measure of the storage capacity at the auto recycling facility. All storage vessels 55-gallon and larger should be labeled and counted in the tank inventory.

Storage Tank Inventory Place an X beside all that apply.

Product	Tank Capacity	Secondary Containment	(circle) then list location
<input type="checkbox"/> Used Oil	_____ gallons	Yes or No	Inside/Outside_____
<input type="checkbox"/> Used Oil	_____ gallons	Yes or No	Inside/Outside_____
<input type="checkbox"/> Gasoline	_____ gallons	Yes or No	Inside/Outside_____
<input type="checkbox"/> Diesel	_____ gallons	Yes or No	Inside/Outside_____
<input type="checkbox"/> New Oil	_____ gallons	Yes or No	Inside/Outside_____
<input type="checkbox"/> Solvent	_____ gallons	Yes or No	Inside/Outside_____
TOTAL CAPACITY	_____ gallons		<i>List containers 55-gallon and larger only.</i>

Facilities with greater than 10,000 gallons of oil storage capacity SPCC Plans must be reviewed and certified by a licensed Professional Engineer.

OSHA has labelling requirements under the Globally Harmonized System

The Hazard Communication Standard or HCS has labeling requirements that display the *GHS* identification of chemicals, signal words, pictograms and precautionary statements. The type of label required in the workplace is called a secondary label (not for transport).



These requirements reflect OSHA's belief that training is an essential part of every employer's safety and health program for protecting workers from injuries and illnesses. Many researchers conclude that those who are new on the job have a higher rate of accidents and injuries than more experienced workers.

OSHA concluded that effective management of worker safety and health protection is a decisive factor in reducing the extent and the severity of work-related injuries and illnesses. Effective management addresses all work-related hazards, whether or not they are regulated by government standards.

A copy of the Plan must be maintained at the facility or property where oil is stored. The plan must be reviewed and recertified every five years either by a professional engineer or self-certification.

The SPCC Plan Must Include

- Written descriptions of any spill events in the preceding twelve months, including corrective action and plans to prevent recurrence.
- Physical layout of facility, including a diagram marking location(s) and contents of each oil storage container and any completely buried tanks, transfer stations and connecting pipes.
- Predictions of the direction, rate of flow, and total quantity of oil that could be discharged.
- A complete discussion of the spill containment and/or diversionary structures used at the facility, such as dikes, berms, or retaining walls, curbing, culverts, gutters, or other drainage systems or spill diversion/retention ponds. Include information on double-wall tanks **and list all sorbent materials to contain spills.**
- A discussion of how the facility manages containment area drainage, including storm water in dikes, dike drainage practices such as inspection procedure and manual discharge and management of un-diked areas diverted to a retention area.
- Describe bulk product storage practices, including verification that tank material and construction are compatible with material stored.
- Describe **secondary containment** means such double-wall tanks and/or dikes with capacity equal to the largest tank plus 10%.
- Procedure to ensure that drainage of containment area does not release oil and the record keeping system to document compliance (i.e., diked area drain valve locked closed; area

inspected for product before the valve is opened; valve opened to drain precipitation; valve locked closed; valve operator signs inspection/drainage record for that event)

- Facility transfer practices, including Means to inspect and maintain aboveground valves and piping and procedures to warn vehicles to avoid damaging aboveground piping and storage, where appropriate
- Tank truck loading and unloading practices, including documentation that loading and unloading procedures meet Department of Transportation (DOT) requirements. Loading/unloading area containment capacity and means to prevent vehicle departure before transfer lines are disconnected.
- Inspection and documentation means to assure the plan is being implemented. **Records must be kept for at least three years.**
- Site security, including restriction of access to oil handling and storage areas. Means to secure tank valves, pumps, and loading and unloading connections when in standby status
- SPCC training conducted, covering the operation and maintenance of equipment, applicable environmental regulations and requirements overview, designation of an SPCC Plan coordinator, training schedule and personnel training records.
- A “Certification of the Applicability of Substantial Harm Criteria” form should also be completed. If all five questions on the form are answered No, then the form need only be included and maintained as part of the SPCC. If any question is answered yes, a facility-specific response plan must be submitted to the EPA.

Reporting if Spill Occurs. In addition to emergency notification, facilities must provide a written report to Environmental Protection Agency (EPA) and their state agency within 60 days if more than 1,000 gallons of oil are discharged or a discharge of more than 42 gallons in each of two spill events within a 12-month period.

The secret to successfully meeting compliance obstacle is to keep working through the process. The CAR program is designed to make that process easier. The value is in the journey, getting to the destination is the reward.

Order a new CAR Certification record at <https://arauniversity.org/product/certification-record-car-gs/> and get started today.