

Spill Prevention Control and Countermeasures (SPCC) 40 CFR Part 112 – Oil Pollution Prevention

SPCC is short for Spill Prevention Control and Countermeasures and was developed under the authority of The Federal Water Pollution Control Act and The Clean Water Act and is designed to prevent oil pollution in US waterways.

The SPCC Rule outlines the requirement of owners and operators of on shore facilities and offshore facilities to prepare and implement a Spill Prevention Control and Countermeasures plan.

The SPCC Rule is mandated for facilities with 1,320 gallons of above ground storage or 42,000 gallons of buried Storage of Petroleum Oils and Non-Petroleum Oils, Animal Fats and Oils and Greases, and Fish and Marine Mammal Oils; and Vegetable Oils (Including Oils from Seeds, Nuts, Fruits, and Kernels)

As the SPCC applies to Justrite's spill control products:

The SPCC Rule outlines the requirement of an owner and operator to demonstrate in their SPCC plans considerations for secondary containment solutions for containers 55 gallons and larger. Each secondary containment shall be as follows:

- 1) To hold the entire capacity of the largest container.
- 2) To have sufficient freeboard to hold precipitation.

Notes:

- 1) *Freeboard: the vertical distance to the lowest point of over flow.*
- 2) *What is adequate freeboard; this needs to be determined by the owner, or the operator or their engineer as outlined in their plan.*
- 3) *Pallets that are sheltered do not require freeboard to hold precipitation. This would be implied under "good engineering practices."*
- 4) *Justrite secondary containment products make great solutions for safe containment for 55 gallon drum storage.*
- 5) *Remember, Sump to Sump connectors are a must on Justrite's smaller sized Accumulation Centers to utilize a combination of sumps to meet the minimum.*
- 6) *The difference in 40 CFR Part 112 and 40 CFR Part 264.175 for hazardous waste is:*
 - *The secondary containment for hazardous waste per 40 CFR Part 264.175 needs capacity for 10% of the volume of all the containers or the volume of the largest container whichever is larger.*
- 7) *The difference in 40 CFR part 112 and NFPA 1 Fire Code, 2006, 60.3.2.10:*
 - ***A liquid-tight sump accessible for visual inspection shall be provided.** (40 CFR Part 112 outlines inspection responsibilities instead and assumes they are visual)*
 - ***The sump shall be designed to contain not less than 66 gallons (249.8L)** (40 CFR Part 112 only requires the capacity of the largest container while the NFPA 1 Fire Code adds 20% more than a 55 gallon drum as a safety factor)*
 - ***Exposed surfaces shall be compatible with material stored, and** (40 CFR Part 112 implies this under the terms "good engineering practices")*
 - ***Containment pallets shall be protected to prevent collection of rainwater within the sump.** (40 CFR Part 112 allows collection of rainwater as long as the secondary containment is sized for the spill plus has freeboard for precipitation before overflowing. Note: because of the scale of some oils storage containers/tanks it is usually impractical to shelter secondary storage.)*