Spill Prevention, Control and Countermeasures (SPCC) Training

40 CFR Part 112

Naval Air Station Corpus Christi Texas

CY 2020

Environmental Management System
Procedures
EMPs

EMP-01	General Requirements
EMP-02	Leadership Commitment and Environmental Policy
EMP-03	Environmental Aspects, Risks and Opportunities
EMP-04	Legal Requirements and Compliance Obligations
EMP-05	Environmental Objectives, Targets and POAMs
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EMP-15	Nonconformity, Corrective Action and Preventive Action
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SPCC Plan

Bottom Line Up Front

To prevent oil discharges from reaching navigable waters of the U.S. or its adjoining shorelines.

For NASCC, this includes any associated wetlands.

SPCC Plan Regulation

Required 'site-specific' plans to prevent oil discharges that could affect navigable waters of the U.S.

Defines a discharge as any leak or spill of oil products.

EPA > Clean Water Act > OPA

↑

TCEQ

Authority was granted under the Clean Water Act (CWA) 311 and 501, and is codified under 40 CFR 112

NO exclusions and NO grandfathering.

Training Required as Specified in 40 CFR Part 112

All personnel who handle oil products must at a minimum be trained in:

- **Operation and maintenance of equipment to prevent spills**
- **Spill response procedures**
- **General facility operations**
- **Applicable pollution control laws, rules, and regulations**
- **And the contents of the site specific SPCC Plan**

An individual must be designated and trained at each facility who is to be accountable for discharge prevention and who reports to facility management.

Training Required as Specified by 40 CFR Part 112

Spill prevention briefings must be held annually and must at a minimum include:

- Any past spills, discharges, or failures of the plan or equipment
- Any malfunctioning equipment
- Any recently developed precautionary measures that have been implemented

Schedule and conduct discharge prevention briefings for “oil handling personnel” at least once a year to assure adequate understanding of the SPCC.

If a significant change has been made to the SPCC Plan.

What is the SPCC Plan?

Spill Prevention, Control, and Countermeasures Plan

EPA's Oil Pollution Prevention regulation establishes requirements for facilities to prevent oil spills from reaching navigable waters of the United States or adjoining shorelines.

The NASCC SPCC Plan is kept on file at the Public Works Environmental Office Building 19 and at NAS website.

http://www.cnic.navy.mil/regions/cnrse/installations/nas_corpus christi/com/environmental_ support/spcc.html

Types of Oil
Which May be Regulated Under SPCC

Animal oils, fats & greases
Asphalt
Aviation gasoline
Bunker fuel
Crude Oil
Cutting Oil
Dielectric fluid

Diesel fuel
Heating oil
Hydraulic Oil
Gasoline
Greases
Jet Fuel
Lubricating Oil

Machine Coolants
Mineral Spirits
Motor Oil
Naphtha
Natural Gas Condensate
Oily Waste
Oil Refuse

Residual Fuels
Stoddard Solvent
Synthetic oils
Tall Oil
Turpentine
Used Oil
Vegetable oils

Goals of SPCC Plan

Familiarize employees with the written SPCC Plan.

Identify oil storage locations and handling procedures.

Identify spill pathways.

Familiarize employees with appropriate spill response procedures and use of response equipment.

Who is Trained on the SPCC Plan?

EPA indicated in a regulatory preamble "oil-handling personnel" are employees engaged in one or more of at least the following functions:

- **Operation and maintenance of oil storage containers (includes storage drums, tanks and oil-filled equipment);**
- **Operation of equipment related to storage containers;**
- **Emergency response personnel.**

ANY employee working at NASCC including contractors involved in oil handling, transfer, storage, spill response, or maintenance of oil filled equipment.

(ECATTS)

ANY fuel oil delivery employees responsible for fueling tanks and equipment on NASCC.

Main Elements of the SPCC Plan

Spill Preventive operating procedures be implemented.

Examples:

- **Routine inspections by SPCC On-Site Coordinator or**
- **Tank custodians observing tank filling procedures**

Control measures installed to prevent oil from reaching navigable waters.

Examples:

- **Secondary containment or**
- **Diversionary structures**

Countermeasures to contain, cleanup, and mitigate the effects of an oil spill.

Examples:

- **Cleanup and spill equipment availability on site**
- **Available list of contacts and phone numbers for employee use during spills**

Potential Spill Pathways

In some areas, oil can enter the "Navigable Waters of the U.S. or adjoining shorelines" by:

- Direct / indirect discharge into a storm drain
- Direct / indirect discharge to any associated wetlands areas that lead to Corpus Christi Bay, Oso Bay, and Laguna Madre

Never allow oil to drain into an open drain or into a ditch or waterway.

Oil containing equipment (i.e. vehicle, tractor, mower) is never to be rinsed or washed near a storm drain or waterway.

Spill Prevention-
Routine Inspections

SPCC plan includes the frequency schedule and checklist necessary for your inspection.

Ensure that necessary maintenance and repairs are completed as scheduled and recorded.

SPCC specific inspections are conducted on a weekly, monthly, quarterly, and annual basis as outlined in the Periodic Inspection Checklist.

(STI SP001 Monthly Inspection form)

Inspection records must be kept for a minimum of three years.

Spill Prevention-
Fuel Deliveries

Tank Truck Drivers loading or unloading materials on NASCC shall:

- **Remain with vehicle at ALL TIMES while loading or unloading**
- **Drain lines to storage tanks and close the drain valves before disconnecting and ensure that appropriate containment is located beneath connections**
- **Inspect vehicle prior to departure to ensure that all lines are disconnected and all drains and vents are closed.**
- **Immediately report all spillage to PW Environmental personnel**

Spill Prevention-
Fuel Operations

No smoking is permitted during fueling operations.

The delivery driver must remain with the vehicle at all times during the fueling operation.

The delivery driver will insure that the vehicle is properly positioned and that drip pans or absorbent pads are beneath all fuel line connections.

The delivery driver will have:

- proper spill control supplies (booms, pads, etc.)
- a list of contact numbers and
- a working cell phone

Spill Prevention-
Alarms and Shut-Off Valves

Monitor activity of leak detection / overfill protection systems and respond immediately to alarms.

DO NOT assume alarms are false even if repeatedly activated.

DO NOT leave fueling station unsupervised during loading operations.

Perform regular tests on monitoring systems to ensure operational capabilities.

Secondary Containment- Requirements

All bulk storage containers of oil must be located in containment sufficient for the entire capacity of the largest container and have sufficient freeboard to contain an additional 10% volume.

Secondary containment must be impervious material.

Secondary containment is NOT required for Qualified Oil- Filled Operational Equipment such as transformers, electrical switches, and elevator tanks, but still must be routinely inspected.

Spill Response

Discovery of Release

- Extinguish or remove any ignition source
- ID the material & point of release
- Notify Fire Dept
- Notify Navy Environmental
- Initiate the spill reporting procedure
- Reference SDS for spilled substance

Containment of Release

- Attempt to stop the release at source
- Contain material to prevent release to environment
- Recover or clean up spill material
- Arrange for disposal of waste
- Navy Environmental is responsible for reporting to outside agencies

Documentation

The SPCC on-site coordinator or tank custodian will report the following information:

- Date, time, and duration of release
- Type of incident
- Material involved
- Volume of material spilled
- SPCC Plan discrepancies
- Actions taken to avoid future incidents

After a Spill

The SPCC on-site coordinator or tank custodian will report the following information:

- How to prevent another occurrence
- Effectiveness of the response

Remember to restock your spill kit:

- Floor dry
- Absorbent, booms, pads, socks
- Caution tape, labels, bags
- Shovels, brooms, pans

SPILL RESPONSE INFORMATION

EXTREMELY IMPORTANT

ONLY RAIN MAY ENTER THE STORM DRAIN.

KEEP ALL CHEMICALS AND SPILLS FROM ENTERING STORM DRAINS, BAYS, PONDS, & CRITICAL HABITAT.

WHAT TO DO

STEP 1 - IF MATERIAL SPILLED PRESENTS A POTENTIAL TO HARM HUMAN LIFE, EVACUATE THE AREA IMMEDIATELY. **CALL 911.**

STEP 2 - SHUT OFF SOURCE OF SPILL, IF POSSIBLE.

STEP 3 - CONTAIN SPILL WITH PROPER ABSORBENTS IN ASSIGNED SPILL KITS.

STEP 4 - NOTIFY COMMAND DUTY OFFICER (CDO) **361-534-9093.**

STEP 5 - NOTIFY & SUBMIT SPILL REPORT WITH PHOTOS TO ENVIRONMENTAL DEPT. **361-961-5353/3776/5356**

Spillers are responsible for cleanup actions and costs.

Reportable Spills:

Any AFFF even if spilled on concrete/asphalt.
Any sheen, discoloration, odor, or hazardous substance in storm drains/bays/ponds/grassy areas.
25 gallons or more of oil or fuel on concrete/asphalt.

SPILL KIT LOCATION:_____

BUILDING/HANGAR NO:_____

Naval Air Station Corpus Christi
Spill Incident Response Checklist

In case of spill, call 911. Identify your location as NAS Corpus Christi.
Complete this form and send to Navy Environmental, Bldg 19, Fax 961-3798.

DATE: _____ TIME: _____ LOCATION: _____
REPORTING INDIVIDUAL: _____
CONTACT INFORMATION: _____

1. Time of occurrence: _____
2. Type of emergency or chemical spilled: _____
3. Number and types of injures: _____
4. Estimated quantity of spill: _____ gallons
5. Source of spill: _____
6. Behavior of spill;

	YES	NO
1. Is fire or flammable chemicals involved?		
2. Is spill flowing into storm drain?		
3. Is spill flowing or on/toward soil?		
4. Is spill flowing towards bay system?		
5. Is the spill reactive?		

RESPONDING AGENCY: _____
ARRIVAL TIME OF RESPONDERS: _____ CONTACT NUMBER: _____

Site assessment: _____

PPE required: _____

Remedial action taken: _____

Incident completion time: _____

Incident report copied to: _____ Date: _____ Time: _____

Emergency vs Shop Spill Response

Emergency Spill

- Release resulted in personal injury or death
- Release immediately dangerous to life, health, and environment
- Release enters storm water conveyance system
- Release enters domestic drain system
- Release enters industrial drain system
- Release enters body of water (navigable body of water)
- Release a Reportable Quantity
- Release beyond the level of spill response training of shop personnel

Incidental/Shop Spill

- Adequate / documented spill response training of shop personnel
- Adequate number of trained spill response personnel
- Adequate / documented training for the proper use of personal protection equipment
- Adequate quantities of applicable spill response equipment

Security

Regulated containers are to be located inside access controlled areas, or gated and locked areas accessible to authorized personnel.

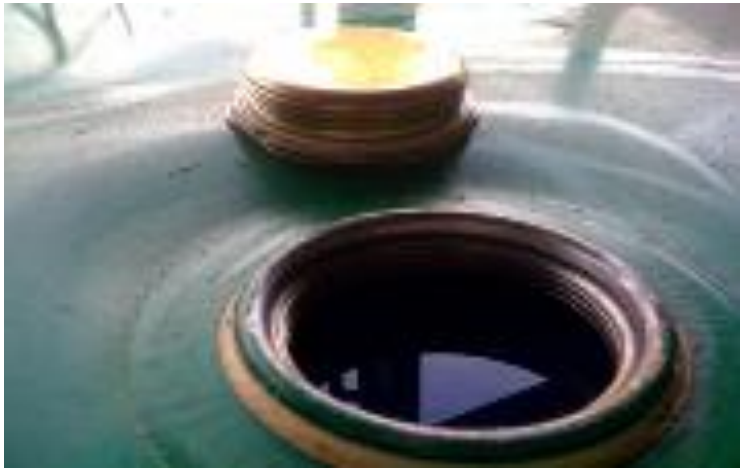
Lighting must be sufficient to enable the visualization of spills or leaks during hours of darkness and to deter releases from occurring through acts of vandalism

Potential Failure Types

1. Overfill by delivery truck.
2. Spillage during delivery hose retrieval.
3. Transfer out of tank. (Dispenser)
4. Transfer out of tank. (Collection Suction Truck)
5. Transfer out of tank. (Small combustion source)
6. Overfill of aircraft from mobile refueler.
7. Hose Retrieval releases at aircraft from mobile refueler.
8. Overfill at truck loading station.
9. Hose retrieval releases at truck loading station.
10. Drum filling and emptying releases.
11. Pipeline failure due to leaking joint or corrosion.
12. Catastrophic.

Common SPCC Violations

Over Filling



Inadequate Training

Spills

Common SPCC Violations

Poor Housekeeping

POLs BMPs

RCRA "Empty" Containers at wash racks

Common SPCC Violations

Lift Stations

Common SPCC Violations

Inadequate Operational Controls

Common SPCC Violations

Bldg. 89 Simulators

Scope of work
removal and disposal
of simulators from Bldg. 89

Best management practices
not implemented.
Spill contingency plans not
in place.

Common SPCC Violations

Inadequate Operational Controls

Internal Spill Notifications

Contact Emergency Dispatch

@ 911

Whenever there is a:

- **Spill**
- **Threat of a spill**
- **Threat to public health or fire**
- **Threat for an explosion involving oil**

(or other hazardous material)

Contact Navy Environmental Office

@ 961-3776/5355/5353

Whenever there is a:

- **Spill**
- **Threat of a spill**
- **Threat to enter, the environment, storm/floor drains, and coastal waters involving oil**

(or other hazardous material)

Questions, Comments, Concerns?

Please contact Navy Environmental
@ 361-961-3776 / 5355 / 5353 or
e-mail address: tracy.l.faulkner@navy.mil

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