

Common SPCC Violations

Some common violations that have been cited by EPA in enforcement actions are listed below. **Note:** These are some of the more general types that may not all be applicable to your facility. In addition, other types of violations not listed below may also apply to your facility's specific operations.

Administration

- The SPCC Plan did not have a signature of approval by management (40 CFR 112.7)
- The SPCC Plan was not certified by a PE (40 CFR 112.3(d))
- No spill history was included in the FRP (40 CFR 112.20(f)(2)(i)(F))
- No self-determination criteria form was included in the SPCC Plan (40 CFR 112.20)
- The Plan lacks written procedures for inspections and for maintaining inspection records for 3 years (40 CFR 112.7(e))
- Personnel are not properly instructed in spill prevention procedures (40 CFR 112.7(f))
- Spill prevention briefings are not conducted for operating personnel (40 CFR 112.7(f)(3))
- Inspections are not conducted as required (40 CFR 112.7(e))

Storage Tanks

- Compatibility of tanks with the material stored is not discussed (40 CFR 112.8(c)(1))
- Internal heating coils are not addressed (40 CFR 112.8(c)(7))
- Mobile and portable oil storage tanks are not addressed (40 CFR 112.8(c)(11))
- Fuel storage tanks are not subjected to scheduled integrity testing (40 CFR 112.7(d))
- One of the oil storage tanks has no secondary containment (40 CFR 112.8(c)(2))

Piping

- Warning vehicle operators of exposed pipes is not addressed in the SPCC Plan (40 CFR 112.8(d)(5))
- Facility lacks procedures for capping/blank flanging and labeling out-of-service pipes (40 CFR 112.8(d)(2))
- Buried pipes between the storage tanks and the gas pumps are reportedly not coated or cathodically protected against corrosion (40 CFR 112.8(c)(4))
- Aboveground pipe supports are not adequate to prevent sagging (40 CFR 112.8(d)(3))

Security

- Facility security measures, including fencing, gates, and/or security guards, are not mentioned in the SPCC Plan (40 CFR 112.7(g)(1))
- Facility lighting is not addressed in the SPCC Plan (40 CFR 112.7(g)(5)(i))
- Facility lacks procedures to lock tank master flow/drain valves and starter controls (40 CFR 112.7(g)(2))
- Facility lacks sufficient lighting to discourage vandalism and facilitate detection of leaks (40 CFR 112.7(g)(5)(i))

Oil Transfer

- Examination of bottom drains of vehicles for leaks before filling and departure is not addressed (40 CFR 112.7(h)(3))
- Inadequate secondary containment exists for truck loading and unloading areas (40 CFR 112.7(h)(1))
- No warning/barrier systems exist to prevent premature vehicular departure (40 CFR 112.7(h)(2))

Miscellaneous

- Drainage system for undiked area is not addressed (40 CFR 112.8(b)(1))
- Lift stations, if any, are not addressed in the SPCC Plan (40 CFR 112.8(b)(5))
- Effluent discharges are not addressed in the SPCC Plan (40 CFR 112.8(c)(3))
- Oil stains on the ground inside the diked area indicate that oil leaks are not always corrected promptly (40 CFR 112.7(c)(10))