

Suggested Training

SPCC training. Owners or operators of regulated facilities must properly instruct their oil-handling personnel in the operation and maintenance of equipment to prevent the discharge of oil. (See 40 CFR 112.7(f), as revised by 67 FR 47042.) Under the rules adopted by EPA described in 67 FR 47042, SPCC training is not required for employees that do not handle oil.

As described in 67 FR 47042, owners or operators must conduct annual spill prevention briefings for their operating personnel to ensure adequate understanding of the SPCC Plan for that facility. The briefings must highlight and describe known discharges, failures, or malfunctioning equipment that occurred within the last year at the facility, and recently developed precautionary measures.

FRP facilities. EPA requires the owner or operator of a “substantial harm” facility to prepare an FRP and have an FRP training program for those personnel involved in oil spill response activities.

A substantial harm facility is one that could cause substantial harm to the environment should a spill occur. This designation is based on an evaluation of such factors as the facility’s transfer operations, oil storage capacity, and lack of secondary containment.

Emergency Response Action Plan (ERAP). Employees are required to know how to implement their facility’s Emergency Response Action Plan in the event of a spill. Trainers must explain in detail how to implement the facility’s ERAP by describing response actions to be carried out under the plan to ensure the safety of the facility and to mitigate or prevent spills.

Other requirements. Trainers should identify facility personnel responsible for performing specific procedures to mitigate or prevent a discharge or potential discharge and identify the response resources for worst-case discharges. Employees should be provided with a list of personnel who would be involved in the cleanup.

For facilities where FRPs are required, training records, such as drill logs, tabletop exercise logs, response training logs, and/or discharge prevention meeting logs, must be maintained and included in the FRP.

Trainers should remind trainees that in addition to EPA’s SPCC requirements, other regulations and training requirements might apply when responding to a spill. For example, OSHA 29 CFR 1910.120 (HAZWOPER) has specific training requirements for workers who respond to hazardous material spills.

Training Sessions

When conducting an SPCC or FRP training session, depending on employees’ specific job functions, the trainer should help employees meet certain training objectives, such as:

- Understand operating procedures that prevent oil spills
- Understand oil spill containment methods and drainage protection requirements
- Be familiar with control measures installed to prevent an oil spill from reaching navigable waters

- Be familiar with your company's ERAP
- Know the name of your company's emergency response coordinator and how to reach him or her in the event of an emergency
- Be aware of evacuation routes
- Understand the facility's SPCC Plan
- Understand the facility's FRP (if applicable) and know how to respond to oil spills
- Understand recordkeeping requirements

Suggested Materials

For a successful training session, the trainer will want to have several copies of the facility's SPCC Plan and FRP on hand (for employee reference only). In addition, other applicable materials to have on hand include:

- Copies of your facility's ERAP
- Copies of facility diagrams
- Examples of spill control equipment your facility has available on-site or pictures or videos of the equipment

The training should include an overview of oil pollution prevention regulatory requirements, including coverage of:

- SPCC regulations
- FRP regulations
- Other related regulations

The training should also include facility-specific information related to:

- Oil spill prevention measures
- Oil spill control methods
- FRP
- ERAP
- Spill control and response equipment
- Shutdown procedures
- Evacuation plans
- FRP training with U.S. Coast Guard training elements

Other Related Regulations

A hazardous waste facility Contingency Plan is a plan required by EPA's RCRA regulation (40 CFR Part 264 and 40 CFR 265 Subpart D). Its purpose is to minimize hazards to human health or the environment from fires, explosions, or unplanned release of hazardous waste or hazardous constituents to air, surface water, or soil caused by waste treatment, storage, or disposal facilities (TSDF) or large quantity generators (LQG). If an SPCC Plan and a Contingency Plan are both required for a facility, in practice, the Contingency Plan may be integrated with the SPCC Plan and other facility emergency plans.