

Oilfield SPCC Requirements Finalized

INTRODUCTION

The Spill Prevention, Control, and Countermeasure (SPCC) rule outlines requirements for prevention of, preparedness for, and response to oil discharges as part of the Oil Pollution Prevention regulation (40 CFR Part 112). Regulated facilities must develop and implement SPCC plans that establish procedures and equipment requirements to help prevent oil discharges from reaching navigable waters or adjoining shorelines.

2002 SPCC APPLICABILITY

In 2002, oilfield operations became subject to the SPCC rules if the following conditions were met:

- Your operation was defined as a non-transportation related facility
- Your operation involves drilling, production, storage, refining, transfer, distribution, use, or consumption of oil or oil-products
- Your operation could reasonably be expected to discharge oil to navigable waters or shorelines
- Your operation includes above ground storage of more than 1,320 U.S. gallons of oil storage (approximately 31 barrels of oil) or buried oil storage tanks of more than 42,000 U.S. gallons (1,000 barrels of oil).

Between 2002 and 2009, SPCC requirements for oilfield operations were amended several times by the EPA in response to industry lawsuits and input received from a variety of interested parties. In November 2009, the EPA finalized SPCC requirements for oilfield operations.

2010 COMPLIANCE DATES FOR SPCC PLANS AND ACTIVITIES

Compliance dates for SPCC Plans and the plan implementation are shown in the following table.

SPCC COMPLIANCE DATES	
A facility starting operation...	Must...
On or before August 16, 2002	Maintain its existing SPCC Plan Amend and implement the SPCC Plans no later than November 10, 2010
After August 16, 2002 through November 10, 2010	Prepare and implement the SPCC Plan no later than November 10, 2010
After Nov. 10, 2010	Prepare and implement a SPCC Plan before beginning operations.* <small>*Owners or operators of new oil production facilities must prepare and implement a SPCC Plan six months after the start of operations</small>

ISSUES FOR OPERATORS

In 2010, the EPA will begin inspections of oilfield facilities in Michigan.

Michigan operators should prepare for inspections by making sure their facilities are in compliance with the regulations. The compliance inspection may result in the following activities:

1. **Physical modification** of facilities (tank battery liners) to meet SPCC requirements. Note: Facilities constructed before 1989 may be likely compliance targets.
2. **Revisions** to existing SPCC Plans or creation of a new plan according to the newly revised regulations *which include many amendments that are favorable to oil production facilities.*
3. **Implementation** of the revised or new plan, as required.
4. **Recordkeeping** related to maintenance, inspections, and employee training from 2002 to present.

If you are subject to the SPCC regulations and need assistance evaluating your compliance status, please contact our office.

Gosling Czubak Engineering Sciences' team of certified professional geologists, professional engineers and environmental scientists are well versed in the preparation and implementation of SPCC Plans. For more information about SPCC Plans contact Jeff Simsa at Gosling Czubak (800) 968-1062.



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