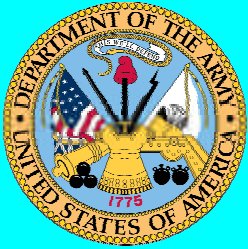


SPCC Regulations and the Department of Defense

Session Objectives:

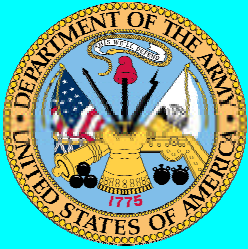
1. Become familiar with SPCC issues affecting DoD installations.
2. Provide recommendations for key things to keep in mind when planning your SPCC compliance strategy.
3. Examine some DoD example fact scenarios.

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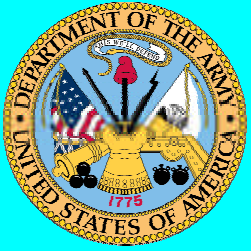
DoD is Taking Action

- Letter to EPA seeking confirmation of DoD's interpretation of the following:
 - “Racks” – 40 CFR 112.7(h)
 - HOTs
 - Secondary containment for oil-filled operating equipment. 40 CFR 112.7(c)
 - PE Certification
- Comments on time extension.



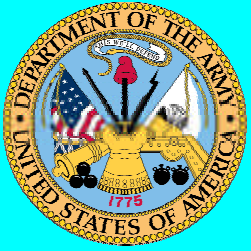
Key Points

- Understanding
 - Program Purpose and Definition
 - Threshold Level Requirements
 - Types of Oil
 - Types of Containers
 - Think about budget and planning impacts.
 - Know your obligations and rights.
- Use you resources.
 - AEC, REOs, AFCEE, EPA, etc.



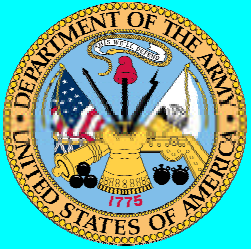
Understanding Applicability

- Understand purpose of the SPCC Program.
- Understand the applicability requirements of the 5-part definition.
- Generally applies to owners or operators (O/O) of facilities that...store, process...transfer, distribute, use or consume oil and oil products, and might be reasonably be expected to discharge oil in quantities that may be harmful into or upon navigable waters of the U.S. or adjoining shorelines, etc. [40 CFR 112.1(b)]



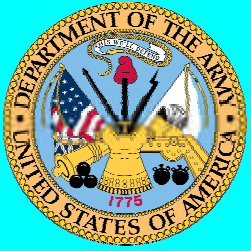
Understand Th

- \geq 55 gallon containers
- Combined aboveground storage >1,320 gallons
- Combined underground storage >42,000 gallons. (Note, USTs regulated under 40 CFR 280 or 281.)



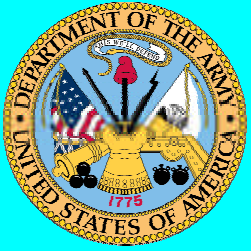
Understand Types of Oil

- All types of oil, in whatever form, solid or liquid. Accordingly, that includes animal oils & fats, vegetable oils, petroleum oils, synthetic oils, mineral oils, oil refuse, oil mixed with wastes other than dredge spoil, etc. (40 CFR 112.2).



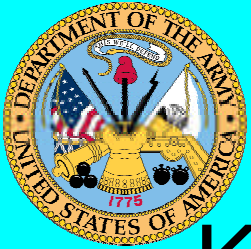
Types of Containers

- Know the difference between oil-filled equipment and bulk storage containers.
- 40 CFR 112.7 general requirements
VS.
- 40 CFR 112.8 specific requirements



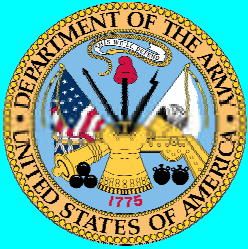
Budget and Planning

- Periodic integrity testing of 40 CFR 112.8(c)(6).
- Secondary containment requirements for things such as pad-mounted transformers.



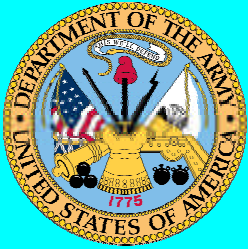
Know Your Obligations and Rights

- Time obligations under 40 CFR 112.3
 - April 17, 2003 and October 18, 2003
 - New facilities and those newly subject to the program have other timing requirements.
- Time extensions under 40 CFR 112.3(f).
- Deviations from general requirements (except secondary containment) under 40 CFR 112.7(a)(2).
- Relief from secondary containment requirements under 40 CFR 112.7(d).



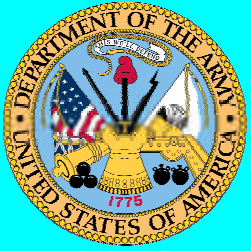
Example Fact Scenario 1

- Fort Compliance has many tanker trucks that transport fuel from storage tanks to a point of use to fuel helicopters in the following ways:
- Hot refueling: Tanker truck is connected to a permanent manifold system. Helicopters land and refuel from the manifold system. Does this refueling method require secondary containment? Under what section of the regulations?
- Tanker trucks drive up to helicopters parked at the airfields to refuel them. Does this refueling method require secondary containment per the requirements of 40 CFR 112.7(h)?



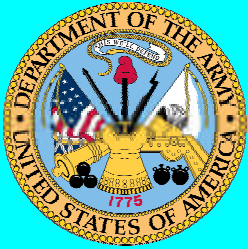
Example Fact Scenario 2

- Tanker Truck Parking--Fort Compliance parks tanker trucks overnight near the primary bulk storage area for JP-8. Remaining fuel is left in the trucks overnight.
- Do these parking areas require secondary containment, and if so, what section of the regulations mandates this requirement?
- If required, should secondary containment be sized for the largest single compartment plus freeboard for a 25-year 24-hour storm event on the entire drainage area?



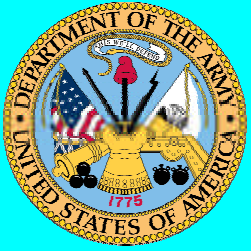
Example Fact Scenario 3

- Transformers—Fort Compliance has many pad-mounted transformers that hold more than 55-gallons of oil.
- Is secondary containment required?
- Is periodic integrity testing required?
- Do you count the amount of oil in the transformers in determining whether the threshold applicability is met?



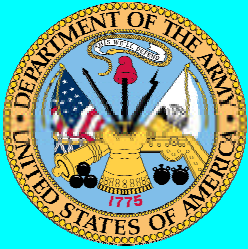
Example Fact Scenario 4

- Fort Compliance has two commercial filling stations that each have three underground storage tanks for gasoline.
- If these tanks are covered by UST regulations of 40 CFR 280 or 281 are they regulated by SPCC regulations?
- Should the tanks be shown on facility drawings in the SPCC Plan?
- Would Fort Compliance need to provide secondary containment for the truck unloading area for the USTs?



Example Fact Scenario 5

- Fort Compliance has 18 food preparation sites with 200-gallon kitchen oil collection devices. None of these currently has secondary containment.
- Will these tanks require secondary containment if they are located indoors?
- What if they are located outdoors?



Conclusion

- Diligence Pays!
- Pay attention to updates and guidance.
- Review Closely.
- Be Thorough.
- Be Consistent.
- Show Good Faith Effort.
- Be Creative and Flexible.
- Put it in Practice.
- Documentation is very important.
- Enforcement can and will happen.