How to Prepare Your Own
SPCC Plan:
A Step-by-Step Guide for
Tier I Qualified Facilities
Using the US EPA Tier I SPCC Template

MODULE VI
Security, Emergency Procedures,
Contact List, Notification and Spill
Reporting
(18 slides + quiz)

Page 6

G-6: Security Measures
1. Affirmation of implementation of security measures
2. Narrative description of the security measures used

G-7: Emergency Procedures & Notification
3. Narrative description of the emergency response actions to be taken

Page 6 Security Measures Detail
1. Security (excluding oil production facilities) (40 CFR 192.7(f)):
   The following is a description of how you secure and control access to the oil handling, processing and storage areas. Secure meter floor and draw valves, prevent unauthorized access to starter controls on oil pumps, secure valve/stainless steel/moisture connections of oil pipelines, address the appropriateness of security lighting to both prevent theft of vandalism and in the discovery of oil discharges.

   Sample in a minute...

   Narratively describe how your facility meets these security requirements... e.g.:
   * All entry gates and doors are secured from unauthorized access either with locks or attended posts (guard, receptionist, etc.)
   * Valves and tank controls are secured with locks
   * Facility is equipped with security and area lighting on timers, photosensors or motion sensors
Security

Must address the security of listed specific and general areas of the facility (40 CFR 112.7(g)).

Specific methods are up to the facility:
- Performance-oriented
  - Anything from locked gates to camera surveillance to guards and guard dogs

The methods or measures used must be described in the SPCC Plan (Table G-6).

Security (continued)

Required security elements:
- Secure & control access to all oil handling, storage & processing areas / equipment
- Secure master flow and drain valves
- Prevent unauthorized access to starter controls
- Secure out of service & loading/unloading connections
- Address appropriateness of security lighting to discourage vandalism and facilitate discharge discovery & response

Example Security Measures

The entire facility does not have to be fenced/secured... it may just be the tanks.

But how good is the fence?
4. Security (excluding oil production facilities) (112.7(k)):

Table 4-3: Implementation and Description of Security Measures

<table>
<thead>
<tr>
<th>Security Measures</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Access to the site during off-hours</td>
<td>Limited access is granted to those with specific authorization.</td>
</tr>
<tr>
<td>Fencing and security blocks</td>
<td>Installed to restrict access.</td>
</tr>
<tr>
<td>Locks and signage</td>
<td>Provided to identify authorized personnel.</td>
</tr>
<tr>
<td>Employees trained to challenge non-employees</td>
<td>Trained to identify and challenge unauthorized access.</td>
</tr>
<tr>
<td>Fire safety and extinguishing provisions</td>
<td>Fully equipped with fire extinguishing equipment.</td>
</tr>
</tbody>
</table>

Sample for Class

Page 6: Emergency Procedures and Notification Detail

5. Emergency Procedures and Notifications (112.7(k)(3)(iv) and 112.7(k)(v)): Sample in a minute

- Can summarize your 'Emergency Response Plans' & 'Contingency Plan' from your County of San Diego Hazardous Materials Business Plan forms
- Reference these Plans in your Table G-7 narrative as well
- Make sure your action plans are consistent with any active general containment measures you described in the SPCC Plan

Sample page from San Diego County DEH Hazardous Materials Business Emergency Plan forms
5. Emergency Procedures and Notifications (112.7(a)(3)(v) and 112.7(a)(5)):

Table 5-1 Description of Emergency Procedures and Instructions:
The following is a description of the immediate actions to be taken by facility personnel in the event of a discharge to navigable waters or adjoining shorelines (40 CFR 112.7(a)(3)(v)) and 112.7(a)(5)).
As detailed in the facility’s Hazardous Materials Business Plan - Emergency Contingency Plan...

| 1 | Immediately contact facility management or supervision. |
| 2 | If the source or cause of the spill/leak can be safely shut off, personnel will immediately attempt to do so. |
| 3 | Management/supervision will determine if the spill/leak presents a threat to health, safety, property, or the environment (excluding any spill entering a storm drain, of waste waterway, or leaving the property) and will immediately notify the CUPA. Cal/Enviros and the National Resource Center. | |
| 4 | If the spill/leak can be safely cleaned up by facility personnel using portable spill supplies - they will do so in accordance with the facility’s Business Emergency Plan. |

In all cases - if the spill/leak may threaten a storm drain or threaten to leave the property, employees will attempt to place sorbents in the spill path or around drains to block the spill - it can be done safely. |

The facility’s hazardous waste contractor will be notified to assist in clean-up if necessary. |

7. All collected spill residues will be properly disposed of as a hazardous waste.

Sample for Class

Facility Name: ____________________________  Page 4  Tier I Qualified Facility Plan

OSCP  An OSCP is a specific type of emergency plan

- OSCP standards in 40 CFR 109.5
- Limited applicability
- Most APSA-regulated tank facilities will not need a 40 CFR 109 OSCP

- Tier I Qualified Facilities can leave Page 15 blank or write N/A on it

Page 15 (Attachment 2)
Oil Spill Contingency Plan

Page 7
G-8: Contact List (for emergencies)

1. Copy from your San Diego DEH Business Emergency / Contingency Plans

- HW Contingency Plan - Emergency Notification Phone Roster

2. Keep all forms and Plans current and consistent!
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This page was excerpted from the CUPA’s Business Plan/Disclosure Forms Packet (can download it from the DEH website)

G-9: Notification Procedures
Instructions and a compliance affirmation
Instructions consistent with San Diego DEH Business Emergency/Contingency Plan notification instructions
SPCC-Specific Spill Reporting

Page 8 Emergency Notification Detail
1. NRC Notification Procedures (41CFR7.7a) and (41CFR7.8)

Table G 9 NRC Notification Procedure
In the event of a discharge of not to navigable waters or acquiring ownership, the following information identified in attachment will be provided to the local Emergency Center immediately following notification of a discharge of not to navigable waters or acquiring ownership:

- The exact address or location and phone number of the facility
- Date and time of the discharge
- Type of materials discharged
- Volume of the total quantity discharged
- Estimate of the quantity discharged to navigable waters
- Source of the discharge

- Description of all affected areas
- Cause(s) of the discharge
- Any damages or injuries caused by the discharge
- Airborne thing used to stop, remove, and mitigate the effects of the discharge
- Whether an evacuation may be needed, and frames of individuals and/or organizations who may have also been contacted

Consistent with San Diego County Agency Notification instructions in Business Emergency/Contingency Plan forms
In fact... just follow the County’s instructions
Will meet APSA reporting requirements of HSC 25270.8
**San Diego County's Agency Reporting Instructions from Business Emergency Plan**

**Page 9: SPCC Spill Reporting Detail**

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These are additional requirements for formal reporting to US EPA Region IX and the SA RWQCB in the event of a major oil discharge to navigable waters.

**Page 20 (Attachment 4, Table G-20) Discharge Notification Form**

This is a good form...

- But you can alternatively make your own discharge notification form.

- This form is not typically required to be submitted to US EPA or the CUPA for a discharge.

- Just kept on file.