

REGULATORY ASSISTANCE

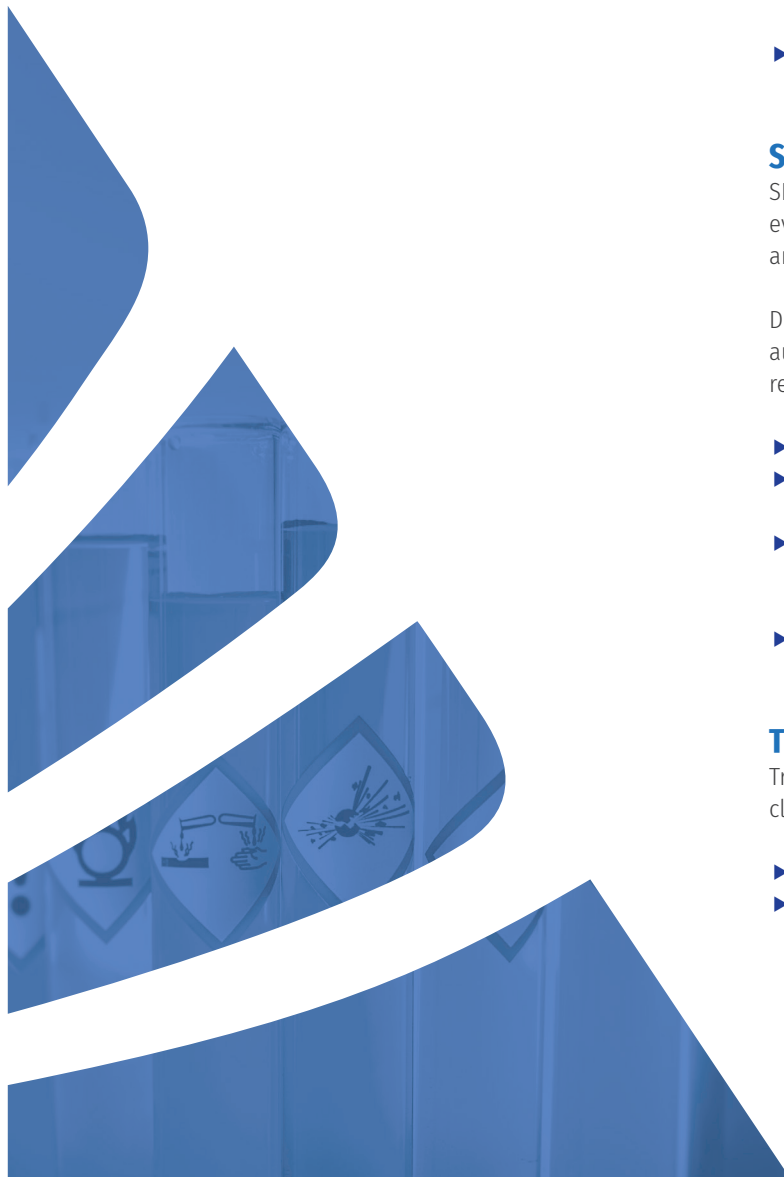
SPCC and FRP Planning Support



Founded in 1974, Trinity Consultants helps organizations overcome complex, mission-critical challenges in EHS, engineering, and science through expertise in consulting, technology, training, and staffing. We support clients in geographies worldwide and across a broad range of sectors including industrial, energy, manufacturing, mining, life sciences, and commercial/institutional.

Spill Prevention, Control, and Countermeasures (SPCC) is regulated by the U.S. EPA, state and other agencies. Under the authority of the Clean Water Act, the Oil Pollution Prevention regulation seeks to prevent oil from polluting U.S. navigable waters and adjoining shorelines.

The SPCC rule, published in 40 CFR Part 112, requires facilities with an aggregate oil container of 1,320 gallons aboveground or 42,000 gallons below ground to develop and submit plans that prevent, prepare for, and respond to a worst-case discharge of oil.



EPA's oil spill prevention program includes two parts:

- ▶ **Spill Prevention, Control, and Countermeasures (SPCC) rule** - Helps facilities prevent a discharge of oil into navigable waters or adjoining shorelines
- ▶ **Facility Response Plan (FRP) rule** - Requires certain facilities to submit a response plan and prepare to respond to a worst case oil discharge or threat of a discharge

To effectively address SPCC and FRP rules, the owner and operator of a facility must determine if their facility(ies) are subject to the rules. Here are a few determining factors:

- ▶ Considered non-transportation-related
- ▶ Engaged in drilling, producing, gathering, storing, processing, refining, distributing, using or consuming oil
- ▶ Have an aboveground oil capacity of more than 1,320 gallons on site, or underground oil capacity of 42,000 gallons
- ▶ Could reasonably be expected to discharge oil in quantities that may be harmful to navigable U.S. waters and adjoining shorelines

SPCC and FRP Plans

SPCC and FRP plans must be reviewed and evaluated at least once every five years. Typically, if you have made necessary changes, there are no significant updates needed during review time.

During a SPCC/FRP Plan Review, it is a good time to consider auditing and possibly upgrading your plan. Questions to ask regarding your plan:

- ▶ Are your plans consistent across the company?
- ▶ Does it make sense to combine your SPCC plan with other environmental and/or operational plans?
- ▶ Have there been any changes in storage tanks that were not captured in prior amendments (i.e., removal of oil filled equipment, non-replacement in-kind, new tank, new contents)?
- ▶ Have your secondary containments changed since the last renewal?

Trinity's SPCC/FRP Services

Trinity Consultants has been providing the following services for its clients for the past 15 years:

- ▶ Plan preparation
- ▶ Plan review



- ▶ Plan execution (employee training, inspection, monitoring)
- ▶ Compliance audits
- ▶ Secondary containment evaluation

Why Choose Trinity

In short, there's no better choice for your chemical compliance regulatory needs. Our experience is multi-faceted and extensive. Our strategies are innovative, time saving, and cost-effective. Our staff and tools are the best in the business.

For more information about how we can help your organization, please contact Trinity Consultants by calling 800.229.665.

ISO 9001:2015 certified at our corporate office in Dallas, Texas