

## SPCC Plans at Petrochemical Facilities: Complex Requirements and Significant Risk

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Petrochemical facilities are subject to numerous environmental compliance requirements, including the Spill Prevention, Control and Countermeasures (SPCC) rule, which is administered by the United States Environmental Protection Agency (US EPA) under 40 CFR Part 112. The SPCC rule requires that engineering controls be implemented to ensure oil does not enter navigable waters of the United States.

The effective implementation of SPCC requirements at petrochemical facilities requires a deep understanding of the SPCC rule. This knowledge, together with an understanding of the complex nature of petrochemical facilities (which frequently transfer petroleum-based chemicals between railcars, tank trucks, barges and other ocean-going vessels), is essential. In addition to preparing a plan, the petrochemical terminal should also be given a document noting the required corrective actions needed to bring the facility into compliance with the SPCC requirements.

### PROBLEM STATEMENT

SPCC requirements at petrochemical facilities are complex, but necessary.

### STRATEGY & SOLUTION

To ensure compliance with the SPCC rule, petrochemical facilities must have an SPCC plan that meets the requirements of 40 CFR Part 112. Since SPCC requirements are complex, Sierra helps the facility meet the SPCC requirements by performing a pre-visit assessment in conjunction with a facility site visit. As part of its SPCC plan preparation process, Sierra provides all clients with a compliance gap analysis that sets forth compliance shortcomings at the time the SPCC plan is prepared.



For example, Sierra documents all oil storage at the facility and gathers information on available secondary containment. At most petrochemical terminals, this includes field measurements of the secondary containment berm surrounding the facility's large tanks. A Sierra engineer will then document a preliminary snapshot of the adequacy of the facility's existing secondary containment. The SPCC plan will include final calculations and issues with the secondary containment will be documented in a written gap analysis incorporated into the SPCC plan.

Sierra can discuss with the client the most cost-effective options for addressing environmental compliance gaps.

### **RESULT**

Sierra's 360° approach to SPCC plan preparation includes the following elements:

- Pre-visit assessment
- Facility site visit
- Preliminary gap analysis
- Review of potential corrective actions
- Written gap analysis

These items help to achieve compliance with complex SPCC regulatory requirements. The effective implementation of these spill countermeasures also helps Sierra's clients reduce their environmental risk.