



**HARVARD**

Campus Services

ENVIRONMENTAL HEALTH, SAFETY &  
EMERGENCY MANAGEMENT

## **SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) FAQ**

### **What is an SPCC Plan?**

An SPCC Plan is a facility-specific comprehensive description of a facility's containment and countermeasures that would prevent an oil spill from occurring as well as procedures to respond to and clean up an oil spill that does occur. The SPCC Plan addresses the following areas:

- Roles and responsibilities of personnel
- Identification, location and containment of oil-containing devices
- Operating procedures that prevent oil spills.
- Control measures installed to prevent a spill from reaching the environment.
- Countermeasures to contain, clean up, and mitigate the effects of an oil spill that reaches the environment.

### **Who has to have an SPCC Plan?**

USEPA's Oil Pollution Prevention Regulations promulgated under the federal Clean Water Act require SPCC Plans for facilities that store large amounts of oil that, if released, have the potential to reach a water body. "Oil" is defined by the EPA and the Clean Water Act to include petroleum and petroleum products, fuel oil, sludge, waste oil, vegetable oil, and animal oils. Oil can be present in underground and above storage tanks and vessels (such as 55-gallon drums). Penalties for not complying with these laws can be as high as \$25,000 per day per violation.

### **Why is Harvard University subject to this requirement?**

Harvard University stores quantities of oil in excess of the threshold amounts contained in EPA's Oil Pollution Prevention Regulations (total storage of 42,000-gallons below ground or 1,320-gallons aboveground) and has campuses along waterways (i.e., the Charles River and Muddy River).

### **How are operations at Harvard affected by the SPCC requirements?**

Affected Harvard campuses must maintain and implement a site specific SPCC Plan, provide training for affected personnel, maintain an accurate inventory and conduct routine inspections of oil-containing equipment and storage devices (i.e., tanks and containers), and implement and perform certain response procedures should a spill occur.



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## **What information is necessary to complete an SPCC Plan?**

Information needed will include: where and how oil is used and stored, what types of containment is present, drainage patterns and anticipated flow rate (should a release occur – where will the oil flow?), preventative maintenance procedures, inspection procedures, and emergency response procedures such as who would be contacted if a spill were to occur and how it would be managed.

## **How information for the SPCC Plan is collected and maintained up-to-date?**

EHSEM has developed Environmental Facility Profiles for each Harvard building. These profiles describe oil-containing equipment and storage devices such as:

- Storage tanks (underground and aboveground)
- Satellite accumulation area containers (waste oil)
- Transformers
- Elevators
- Vehicles
- Cooking equipment
- Boilers and emergency generators

Designated Environmental and Safety Compliance Officers (ESCO) from Harvard faculties and departments are responsible for maintaining their Environmental Facility Profiles for each of their buildings. Profiles must be updated annually with any changes provided to EHSEM (new oil storage devices or those taken out of service).

## **Who is required to be trained on the SPCC Plan?**

USEPA requires SPCC compliance training for personnel who have a role in the management of oil including delivery, maintenance, storage, disposal, or spill response. It is necessary for Harvard faculties and departments to identify those personnel in their groups that require training and direct them to the **SPCC classroom training** offered by EHSEM. EHSEM also offers on-line annual SPCC refresher training. Personnel should be trained immediately upon hire or transfer to a position involved with oil management. It is recommended that personnel receive annual SPCC re-training.



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### **How often must the SPCC Plan be reviewed and, if necessary, amended?**

The SPCC Plan must be reviewed at least once every five years and the review must be documented. The SPCC Plan must be amended whenever there is a change in the facility design, construction, operation, or maintenance that affects the facility's potential to discharge oil into a nearby water body. In addition, the USEPA may require amendments to the SPCC Plan if a facility discharges in excess of 1,000 gallons in a single event, or following two releases greater than 42 gallons to a water body within any twelve-month period. Amendments must be certified by a registered professional engineer.

### **What are the consequences for non-compliance with SPCC regulations?**

Penalties for not complying with these laws can be as high as \$25,000 per day per violation. Specific violations include:

- Untrained personnel
- Inadequate recordkeeping
- Failure to report a spill which releases to waterways
- Lack of an adequate SPCC Plan unique to the facility containing the following elements:
  - 1) Identification of all oil storage and use locations and quantity of oil stored.
  - 2) Written descriptions of any past spills including corrective action taken and plans for preventing a recurrence.
  - 3) A description of containment, diversionary structures, or equipment to prevent a spill of oil from reaching waterways.
  - 4) A complete discussion of the spill prevention and control measures applicable to the facility and its operations.
  - 5) Operating procedures established to prevent spills from occurring.
  - 6) Adequate control measures to prevent a spill from reaching waterways.



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ENVIRONMENTAL HEALTH, SAFETY &  
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7) Adequate implementation procedures and countermeasures to contain, clean-up, and mitigate the effects of an oil spill that reaches waterways.