

# ENVIRONMENTAL PROTECTION AGENCY SPCC FIELD INSPECTION AND PLAN REVIEW CHECKLIST

OFFSHORE OIL DRILLING, PRODUCTION AND WORKOVER FACILITIES

#### **Overview of the Checklist**

This checklist is designed to assist EPA inspectors in conducting a thorough and nationally consistent inspection of a facility's compliance with the Spill Prevention, Control, and Countermeasure (SPCC) rule at 40 CFR part 112. It is a required tool to help federal inspectors (or their contractors) record observations for the site inspection and review of the SPCC Plan. While the checklist is meant to be comprehensive, the inspector should always refer to the SPCC rule in its entirety, the SPCC Regional Inspector Guidance Document, and other relevant guidance for evaluating compliance. This checklist must be completed in order for an inspection to count toward an agency measure (i.e., OEM inspection measures or GPRA). The completed checklist and supporting documentation (i.e. photo logs or additional notes) serve as the inspection report.

This checklist addresses requirements for offshore oil production, drilling, and workover facilities.

Separate and standalone checklists address the requirements for:

Onshore facilities including Tier II Qualified Facilities (excluding oil drilling, production and workover facilities);

Onshore oil drilling, production and workover facilities including Tier II Qualified Facilities as defined in §112.3(g)(2); and

Tier I Qualified Facilities (for facilities that meet the eligibility criteria defined in §112.3(g)(1)).

Qualified facilities must meet the rule requirements in §112.6 and other applicable sections specified in §112.6, except for deviations that provide environmental equivalence and secondary containment impracticability determinations as allowed under §112.6.

The checklist is organized according to the SPCC rule. Each item in the checklist identifies the relevant section and paragraph in 40 CFR part 112 where that requirement is stated.

- Sections 112.1 through 112.5 specify the applicability of the rule and requirements for the preparation, implementation, and amendment of SPCC Plans. For these sections, the checklist includes data fields to be completed, as well as several questions with "yes," "no" or "NA" answers.
- Section 112.7 includes general requirements that apply to all facilities (unless otherwise excluded).
- Section 112.11 specifies spill prevention, control, and countermeasures requirements for offshore oil drilling, production and workover facilities.

The inspector needs to evaluate whether the requirement is addressed adequately or inadequately in the SPCC Plan and whether it is implemented adequately in the field (either by field observation or record review). For the SPCC Plan and implementation in the field, if a requirement is addressed adequately, mark the "Yes" box in the appropriate column. If a requirement is not addressed adequately, mark the "No" box. If a requirement does not apply to the particular facility or the question asked is not appropriate for the facility, mark as "NA". Discrepancies or descriptions of inspector interpretation of "No" vs. "NA" may be documented in the comments box subsequent to each section. If a provision of the rule applies only to the SPCC Plan, the "Field" column is shaded.

Space is provided throughout the checklist to record comments. Additional space is available as Attachment D at the end of the checklist. Comments should remain factual and support the evaluation of compliance.

Attachments (Attachments A and B are included for hybrid facilities which have both offshore and onshore components)

- Attachment A is a checklist for Sections 112.8 and 112.12. This checklist specifies requirements for spill prevention, control, and countermeasures for onshore facilities (excluding oil production facilities).
- Attachment B is a checklist that specifies requirements for spill prevention, control, and countermeasures for onshore oil production facilities (112.9 provisions) and onshore drilling and workover facilities (112.10 provisions)
- Attachment C is for recording information about containers and other locations at the facility that require secondary containment.
- Attachment D is a checklist for documentation of the tests and inspections the facility operator is required to keep with the SPCC Plan.
- Attachment E is a checklist for oil spill contingency plans following 40 CFR 109. Unless a facility has submitted a
  Facility Response Plan (FRP) under 40 CFR 112.20, a contingency plan following 40 CFR 109 is required if a
  facility determines that secondary containment is impracticable as provided in 40 CFR 112.7(d). The same
  requirement for an oil spill contingency plan applies to the owner or operator of a facility with qualified oil-filled
  operational equipment that chooses to implement alternative requirements instead of general secondary
  containment requirements as provided in 40 CFR 112.7(k).
- Attachment F is for recording additional comments or notes.
- Attachment G is for recording information about photos.

FACILITY INFORMATION									
FACILITY NAME:									
LATITUDE:	LONGITUDE: GPS DATUM:								
Section/Township/Range:			FRS#/OIL DA	ГАВ	ASE ID:			I	ICIS#:
ADDRESS:									
CITY: ZIP: COUNTY:					DUNTY:				
MAILING ADDRESS (IF DIFFERENT FROM FACILITY ADDRESS – IF NOT, PRINT "SAME"):									
CITY:	STATE:			ZIP	):			CC	DUNTY:
TELEPHONE:	FAG	CIL	ITY CONTACT	NAI	ME/TITLE		l.		
OWNER NAME:									
OWNER ADDRESS:									
CITY:	STATE:			ZIP	):			C	OUNTY:
TELEPHONE:	FAX	X:					EMAIL:	l	
FACILITY OPERATOR NAME (IF DIFFERENT	FROM OWNE	R –	IF NOT, PRINT "SAME	≣"):					
OPERATOR ADDRESS:									
CITY:	STATE:			ZIP	):			C	OUNTY:
TELEPHONE:	ОР	ER	ATOR CONTA	CT N	NAME/TIT	LE:			
FACILITY TYPE:	<b>'</b>							NA	AICS CODE:
HOURS PER DAY FACILITY ATTENDED	):			TO	TAL FACI	LITY C	APACITY:		
TYPE(S) OF OIL STORED:				1					
LOCATED IN INDIAN COUNTRY?	s 🗆 N	0	RESERVATIO	N N	AME:				
INSPECTION/PLAN REVIEW INFOR	MATION	I							
PLAN REVIEW DATE:	RI	ΕV	IEWER NAME:						
INSPECTION DATE:	ТІ	ME	<u>:</u>		ACTIVIT	Y ID NO	D:		
LEAD INSPECTOR:									
OTHER INSPECTOR(S):									
INSPECTION ACKNOWLEDGMENT									
I performed an SPCC inspection at the fac	cility speci	ifie	d above.						
INSPECTOR SIGNATURE:								D	ATE:
SUPERVISOR REVIEW/SIGNATURE:								D	ATE:

SPCC GENERAL APPLICABILITY—40 CFR 112.1					
IS THE FACILITY REGULATED UNDER 40 CFR part 112?					
The completely buried oil storage capacity is over 42,000 U.S. gallons, <u>OR</u> the aggregate aboveground oil storage capacity is over 1,320 U.S. gallons <u>AND</u> Yes No					
The facility is a non-transportation-related facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States					
AFFECTED WATERWAY(S):	DISTANCE:				
FLOW PATH TO WATERWAY:					
Note: The following storage capacity is not considered in determining applicability	of SPCC requirements:				
<ul> <li>Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management</li> </ul>	Containers smaller than 55 U.S. gallons;				
Service, as defined in Memoranda of Understanding dated November	<ul> <li>Permanently closed containers (as defined in §112.2);</li> </ul>				
24, 1971, and November 8, 1993; Tank trucks that return to an otherwise regulated facility that contain only residual amounts of oil (EPA Policy	Motive power containers (as defined in §112.2);				
letter) - Completely buried tanks subject to all the technical requirements of 40	Hot-mix asphalt or any hot-mix asphalt containers;				
CFR part 280 or a state program approved under 40 CFR part 281;	<ul> <li>Heating oil containers used solely at a single-family residence;</li> </ul>				
<ul> <li>Underground oil storage tanks deferred under 40 CFR part 280 that supply emergency diesel generators at a nuclear power generation</li> </ul>	Pesticide application equipment and related mix containers;				
facility licensed by the Nuclear Regulatory Commission (NRC) and subject to any NRC provision regarding design and quality criteria,	<ul> <li>Any milk and milk product container and associated piping and appurtenances; and</li> </ul>				
including but not limited to CFR part 50;	Intra-facility gathering lines subject to the regulatory requirements				
<ul> <li>Any facility or part thereof used exclusively for wastewater treatment (production, recovery or recycling of oil is not considered wastewater treatment); (This does not include other oil containers located at a wastewater treatment facility, such as generator tanks or transformers)</li> </ul>	of 49 CFR part 192 or 195.				
Does the facility have an SPCC Plan?	☐ Yes ☐ No				
FACILITY RESPONSE PLAN (FRP) APPLICABILITY —40 CFR	112.20(f)				
A non-transportation related onshore facility is required to prepare and im	•				
☐ The facility transfers oil over water to or from vessels and has a to 42,000 U.S. gallons, <u>OR</u>	otal oil storage capacity greater than or equal to				
☐ The facility has a total oil storage capacity of at least 1 million U.S					
The facility does not have secondary containment sufficiently plus sufficient freeboard for precipitation.					
	uld cause injury to fish and wildlife and sensitive environments.				
☐ The facility is located such that a discharge would shut down	•				
☐ The facility has had a reportable discharge greater than or ed					
Facility has FRP: Yes No NA	FRP Number:				
Facility has a completed and signed copy of Appendix C, Attachment C-II "Certification of the Applicability of the Substantial Harm Criteria."	I, ☐ Yes ☐ No				
Comments:					

REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC PLAN—40 CFR 112.3				
Date facility beg	an operations:			
Date of initial SF	iber):			
112.3(a)	<ul> <li>that are offshore or have an offshore of submit a FRP:</li> <li>In operation on or prior to November implemented by November 10, 2010</li> <li>Facilities beginning operation after November 10</li> </ul>	□Yes □No □NA		
	operations; or	nented before drilling and workoven	-	☐ Yes ☐ No ☐ NA ☐ Yes ☐ No ☐ NA
PE Name: 112.3(e)(1)	Plan is certified by a registered Profession PE attests:  PE is familiar with the requirements  PE or agent has visited and examine  Plan is prepared in accordance with of applicable industry standards and  Procedures for required inspections  Plan is adequate for the facility  For produced water containers subject amount of free-phase oil is designed the procedures and frequency for respondence of the procedures and are described and are described.  License No.:	facilities begin operations  lan is certified by a registered Professional Engineer (PE) and includes statements that the E attests:  PE is familiar with the requirements of 40 CFR part 112  PE or agent has visited and examined the facility  Plan is prepared in accordance with good engineering practice including consideration of applicable industry standards and the requirements of 40 CFR part 112  Procedures for required inspections and testing have been established  Plan is adequate for the facility  For produced water containers subject to 112.9(c)(6), any procedure to minimize the amount of free-phase oil is designed to reduce the accumulation of free-phase oil and the procedures and frequency for required inspections, maintenance and testing have been established and are described in the Plan, if applicable		
	available at the nearest field office. (Plea comments section below.)	ase note nearest field office contac	ct information in	
AMENDMENT	OF SPCC PLAN BY REGIONAL AD	MINISTRATOR (RA)—40 CF	R 112.4	
112.4(a),(c)	Has the facility discharged more than 1,00 discharge or more than 42 U.S. gallons in month period? <sup>1</sup>			Yes No
If YES	<ul> <li>Was information submitted to the RA</li> <li>Was information submitted to the appollution control activities in the State</li> <li>Date(s) and volume(s) of reportable</li> <li>Were the discharges reported to the</li> </ul>	propriate agency or agencies in one in which the facility is located§1 discharges(s) under this section:  NRC <sup>3</sup> ?	12.4(c)	Yes No NA Yes No NA
112.4(d),(e)	Have changes required by the RA been in	mplemented in the Plan and/or fac	cility?	Yes No NA
Comments:				

<sup>&</sup>lt;sup>1</sup> A reportable discharge is a discharge as described in §112.1(b)(see 40 CFR part 110). The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

<sup>2</sup> Triggering this threshold may disqualify the facility from meeting the Qualified Facility criteria if it occurred in the three years prior to self certification

<sup>&</sup>lt;sup>3</sup> Inspector Note-Confirm any spills identified above were reported to NRC

	OF SPCC PLAN B	Y THE OWNER OR OPER	RATOR—40 CFF	R 112	.5	
112.5(a)	Has there been a change at the facility that materially affects the potential for a discharge described in §112.1(b)?					☐ Yes ☐ No
If YES	Was the Plan ar	mended within six months of t	the change?			☐ Yes ☐ No
	Were amendme	nts implemented within six m	onths of any Plan	amen	dment?	☐ Yes ☐ No
112.5(b)	Review and evaluation	on of the Plan completed at le	ast once every 5 y	ears?		☐ Yes ☐ No ☐ NA
	prevention and contro	v, was Plan amended within soll technology that has been finge described in §112.1(b)?				☐ Yes ☐ No ☐ NA
	Amendments implem	ented within six months of ar	ny Plan amendmen	nt?		☐ Yes ☐ No ☐ NA
	Five year Plan review	and evaluation documented	?			☐Yes ☐No ☐NA
112.5(c)		er certification of any technica nts of §112.3(d) [Except for s			ccordance with all	☐Yes ☐No ☐NA
Name:		License No.:	State:	I	Date of certification	:
Reason for ame	nument.					
Comments.						
GENERAL SF	CC REQUIREMEN	TS-40 CFR 112.7			PLAN	FIELD
	oproval at a level of au	TS—40 CFR 112.7 thority to commit the necessar	ary resources to		PLAN  ∕es □ No	FIELD
Management ap fully implement	oproval at a level of au the Plan <sup>4</sup> quence of the rule or is					FIELD
Management ap fully implement  Plan follows sec rule requiremen  If Plan calls for to operational, det	oproval at a level of au the Plan <sup>4</sup> quence of the rule or is its and includes a cros facilities, procedures, r	thority to commit the necessary s an equivalent Plan meeting s-reference of provisions methods, or equipment not ye and start-up are discussed (	all applicable	П	∕es □No	FIELD
Management apfully implement  Plan follows secrule requirement  If Plan calls for toperational, determinational, determinational for inspection et al. 112.7(a)(2)	oproval at a level of authe Plan <sup>4</sup> quence of the rule or is its and includes a crossifacilities, procedures, rails of their installation valuation and testing but the Plan includes de (h)(2) and (3), and (i) except the secondar (h)(1), 112.9(c)(2), 1	s an equivalent Plan meeting s-reference of provisions methods, or equipment not yet and start-up are discussed (baselines.) eviations from the requirement and applicable subparts B at y containment requirements if 12.9(d)(3), and 112.10(c)	all applicable et fully Note: Relevant ets of §§112.7(g), and C of the rule, in §§112.7(c) and		/es □ No □ NA /es □ No □ NA /es □ No □ NA	FIELD
Management apfully implement  Plan follows securile requirement  If Plan calls for operational, determinspection en	oproval at a level of au the Plan <sup>4</sup> quence of the rule or is its and includes a crossfacilities, procedures, rails of their installation valuation and testing b  The Plan includes de (h)(2) and (3), and (i) except the secondar (h)(1), 112.9(c)(2), 1  The Plan states  Alternative mease equivalent environ document if the	s an equivalent Plan meeting s-reference of provisions methods, or equipment not yet and start-up are discussed (paselines.) eviations from the requirement and applicable subparts B ary containment requirements is	all applicable  et fully (Note: Relevant  ints of §§112.7(g), and C of the rule, in §§112.7(c) and  er provide provide provide provide provide in spector should is implemented in		/es □ No □ NA /es □ No □ NA	FIELD  Yes No NA
Management apfully implement  Plan follows security requirement  If Plan calls for to operational, detror inspection et 112.7(a)(2)  If YES	oproval at a level of au the Plan <sup>4</sup> quence of the rule or is its and includes a crossfacilities, procedures, rails of their installation valuation and testing b  The Plan includes de (h)(2) and (3), and (i) except the secondar (h)(1), 112.9(c)(2), 1  The Plan states  Alternative mease equivalent environ document if the	s an equivalent Plan meeting s-reference of provisions methods, or equipment not ye and start-up are discussed (paselines.) eviations from the requirement) and applicable subparts B ary containment requirements in 12.9(d)(3), and 112.10(c) reasons for nonconformance sures described in detail and conmental protection (Note: Intervironmental equivalence is predance with the Plan's described.	all applicable  et fully (Note: Relevant  ints of §§112.7(g), and C of the rule, in §§112.7(c) and  er provide provide provide provide provide in spector should is implemented in		Yes □ No □ NA	

 $<sup>^{\</sup>rm 4}\,{\rm May}$  be part of the Plan or demonstrated elsewhere.

		PLAN	FIELD
112.7(a)(3)	Plan describes physical layout of facility and includes a diagram <sup>5</sup> that identifies:  Location and contents of all regulated fixed oil storage containers  Storage areas where mobile or portable containers are located  Completely buried tanks otherwise exempt from the SPCC requirements (marked as "exempt")  Transfer stations  Connecting pipes, including intra-facility gathering lines that are otherwise exempt from the requirements of this part under §112.1(d)(11)	Yes No	☐ Yes ☐ No
	Plan addresses each of the following:		L
(i)	For each fixed container, type of oil and storage capacity (see Attachment A of this checklist). For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities	☐Yes ☐No	☐ Yes ☐ No
(ii)	Discharge prevention measures, including procedures for routine handling of products (loading, unloading, and facility transfers, etc.)	☐Yes ☐ No	☐ Yes ☐ No
(iii)	Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge	☐Yes ☐ No	☐ Yes ☐ No
(iv)	Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources)	☐ Yes ☐ No	☐ Yes ☐ No
(v)	Methods of disposal of recovered materials in accordance with applicable legal requirements	☐ Yes ☐ No	
(vi)	Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with an agreement for response, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b)	☐Yes ☐No	
112.7(a)(4)	Does not apply if the facility has submitted an FRP under §112.20:	☐ Yes ☐ No ☐ NA	
	<ul> <li>Estimates of the quantity discharged as described in §112.1(b);</li> <li>Source of the discharge;</li> <li>mitigate the effect whether an evacuand</li> </ul>	affected media; harge; es caused by the  d to stop, remove, and s of the discharge; uation may be needed; als and/or organizations	
112.7(a)(5)	Does not apply if the facility has submitted a FRP under §112.20:	☐ Yes ☐ No ☐ NA	
	Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency		
112.7(b)	Plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure	☐ Yes ☐ No ☐ NA	
Comments:			

<sup>&</sup>lt;sup>5</sup> Note in comments any discrepancies between the facility diagram, the description of the physical layout of facility, and what is observed in the field Offshore Oil Drilling, Production and Workover Facilities Page 6 of 10 June 2014

		PLAN	FIELD			
112.7(c)	Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in §112.1(b), except as provided in §112.7(k) of this section for certain qualified operational equipment and §112.9(d)(3) for certain flowlines and intra-facility gathering lines at an oil production facility. The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method, design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. See Attachment A of this checklist.					
	For offshore facilities, one of the following or its equivalent:					
	Identify which of the following are present at the facility and if appropriate or equipment are provided as described above:	riate containment and/or	diversionary structures			
	☐ Bulk storage containers	☐ Yes ☐ No ☐ NA	☐Yes ☐No ☐NA			
	☐ Mobile/portable containers	Yes No NA	Yes No NA			
	Oil-filled operational equipment (as defined in 112.2)	Yes No NA	Yes No NA			
	Other oil-filled equipment (i.e., manufacturing equipment)	Yes No NA	Yes No NA			
	☐ Piping and related appurtenances	Yes No NA	Yes No NA			
	Mobile refuelers or non-transportation-related tank cars	Yes No NA	Yes No NA			
	☐ Identify any other equipment or activities that are not listed above:	Yes No NA	Yes No NA			
112.7(d)	Secondary containment for one (or more) of the following provisions is determined to be impracticable:	☐Yes ☐No				
	General secondary containment \$112.7(c) Bulk storage containers \$\$112.8(c)(2)/112.12(c)(2)					
	Loading/unloading rack \$112.7(h)(1) Mobile/portable containers§\$112.8(c)(11)/112.12 (c)(11)					
If YES	The impracticability of secondary containment is clearly demonstrated and described in the Plan	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA			
	<ul> <li>For bulk storage containers,<sup>6</sup> periodic integrity testing of containers and integrity and leak testing of the associated valves and piping is conducted</li> </ul>	☐ Yes ☐ No ☐ NA	☐Yes ☐ No ☐ NA			
		☐Yes ☐No ☐NA				
	<ul> <li>Contingency Plan following the provisions of 40 CFR part 109 is provided (see Attachment C of this checklist) <u>AND</u></li> </ul>					
	<ul> <li>Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful</li> </ul>	☐ Yes ☐ No ☐ NA	☐Yes ☐No ☐NA			
Comments:						

<sup>&</sup>lt;sup>6</sup> These additional requirements apply only to bulk storage containers, when an impracticability determination has been made by the PE

		PLAN	FIELD
112.7(e)	Inspections and tests conducted in accordance with written procedures	☐Yes ☐No	☐ Yes ☐ No
	Record of inspections or tests signed by supervisor or inspector	☐ Yes ☐ No	☐ Yes ☐ No
	Kept with Plan for at least 3 years (see Attachment B of this checklist) <sup>7</sup>	☐ Yes ☐ No	☐ Yes ☐ No
112.7(f)	Personnel, training, and oil discharge prevention procedures		
(1)	Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of SPCC Plan	Yes No NA	Yes No NA
(2)	Person designated as accountable for discharge prevention at the facility and reports to facility management	Yes No NA	Yes No NA
(3)	Discharge prevention briefings conducted at least once a year for oil handling personnel to assure adequate understanding of the Plan. Briefings highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures	Yes No NA	Yes No NA
112.7(h)	Tank car and tank truck loading/unloading rack <sup>8</sup> is present at the fac	cility	☐ Yes ☐ No
	Loading/unloading rack means a fixed structure (such as a platform, gangwa tank car, which is located at a facility subject to the requirements of this part. unloading arm, and may include any combination of the following: piping ass sensors, or personnel safety devices.	A loading/unloading rack in	cludes a loading or
If <b>YES</b> (1)	Does loading/unloading rack drainage flow to catchment basin or treatment facility designed to handle discharges or use a quick drainage system?	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	Containment system holds at least the maximum capacity of the largest single compartment of a tank car/truck loaded/unloaded at the facility	☐ Yes ☐ No ☐ NA	Yes No NA
(2)	An interlocked warning light or physical barriers, warning signs, wheel chocks, or vehicle brake interlock system in the area adjacent to the <b>loading or unloading rack</b> to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines	Yes No NA	Yes No NA
(3)	Lower-most drains and all outlets on tank cars/trucks inspected prior to filling/departure, and, if necessary ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit	Yes No NA	Yes No NA
112.7(i)	Brittle fracture evaluation of field-constructed aboveground containers is conducted after tank repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or after a discharge/failure due to brittle fracture or other catastrophe, and appropriate action taken as necessary (applies to only field-constructed aboveground containers in production service, drilling, and workover service)	Yes No NA	Yes No NA
112.7(j)	Discussion of conformance with applicable more stringent State rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR part 112	☐Yes ☐No ☐NA	
Comments:			

Records of inspections and tests kept under usual and customary business practices will suffice
 Note that a tank car/truck loading/unloading rack must be present for §112.7(h) to apply. Though this requirement applies to all facilities, loading and unloading rack equipment is often not present at typical offshore production facilities.

		PLAN	FIELD		
112.7(k)	Qualified oil-filled operational equipment is present at the facility <sup>9</sup>		☐ Yes ☐ No		
	Oil-filled operational equipment means equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g., those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.				
If YES	Check which apply:				
	Secondary Containment provided in accordance with 112.7(c)				
	Alternative measure described below (confirm eligibility)				
112.7(k)	<ul> <li>Qualified Oil-Filled Operational Equipment</li> <li>Has a single reportable discharge as described in §112.1(b) from operational equipment exceeding 1,000 U.S. gallons occurred with prior to Plan certification date?</li> </ul>		☐ Yes ☐ No ☐ NA		
	<ul> <li>Have two reportable discharges as described in §112.1(b) from operational equipment each exceeding 42 U.S. gallons occurred period within the three years prior to Plan certification date?<sup>10</sup></li> </ul>		☐Yes ☐No ☐NA		
	If YES for either, secondary containment in accor-	dance with §112.7(c) is re	equired		
	<ul> <li>Facility procedure for inspections or monitoring program to detect equipment failure and/or a discharge is established and documented</li> <li>Does not apply if the facility has submitted a FRP under §112.20:</li> </ul>	Yes No NA	☐ Yes ☐ No ☐ NA		
	<ul> <li>Contingency plan following 40 CFR part 109 (see Attachment</li> </ul>	☐Yes ☐No ☐NA			
	<ul> <li>C of this checklist) is provided in Plan <u>AND</u></li> <li>Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in Plan</li> </ul>	Yes No NA			
	DIL DRILLING, PRODUCTION OR WORKOVER 40 CFR 112.11	PLAN	FIELD		
112.11(b)	Oil drainage collection equipment used to prevent and control small discharges around pumps, glands, valves, flanges, expansion joints, hoses, drain lines, separators, treaters, tanks, and associated equipment	Yes No NA	Yes No NA		
	Facility drains are controlled and directed toward a central collection sump to prevent a discharge as described in §112.1(b); if drains and sumps not practicable, oil in collection equipment removed as often as necessary to prevent overflow	Yes No NA	Yes No NA		
112.11(c)	For facilities using a sump system, sump and drains adequately sized	☐Yes ☐No ☐NA	☐ Yes ☐ No ☐ NA		
	For facilities using a sump system, spare pump available to remove liquids and assure that oil does not escape	☐Yes ☐No ☐NA	☐Yes ☐No ☐NA		
	Regularly scheduled preventive maintenance inspection and testing program to assure reliable operation of liquid removal system and pump start-up device	Yes No NA	Yes No NA		
	Redundant automatic sump pumps and control devices are installed if necessary	Yes No NA	Yes No NA		
Comments:					

<sup>&</sup>lt;sup>9</sup> This provision does not apply to oil-filled manufacturing equipment (flow-through process)

10 A reportable discharge is a discharge as described in §112.1(b)(see 40 CFR part 110). Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

		PLAN	FIELD
112.11(d)	If separators and treaters are equipped with dump valves which predominantly fail in the closed position and where pollution risk is high, facility equipped to prevent discharges by:  • Extending the flare line to a diked area if the separator is near shore;	Yes No NA	Yes No NA
	<ul> <li>Equipping separator with high liquid level sensor to automatically shut in wells producing to the separator; or</li> </ul>		
	Installing parallel redundant dump valves.		
112.11(e)	Atmospheric storage or surge containers equipped with high liquid level sensing devices that activate an alarm or control the flow, or otherwise prevent discharges	Yes No NA	Yes No NA
112.11(f)	Pressure containers equipped with high and low pressure sensing devices that activate an alarm or control the flow	Yes No NA	☐Yes ☐No ☐NA
112.11(g)	Containers equipped with suitable corrosion protection	☐ Yes ☐ No ☐ NA	☐Yes ☐No ☐NA
112.11(h)	Written procedures maintained in the SPCC Plan for inspecting and testing pollution prevention equipment and systems	☐Yes ☐No ☐NA	☐Yes ☐No ☐NA
112.11(i)	Testing and inspection of pollution prevention equipment and systems conducted on a scheduled periodic basis commensurate with the complexity, conditions, and circumstances of the facility and any other applicable regulations.	Yes No NA	Yes No NA
	Simulated discharges are used for testing and inspecting human and equipment pollution control and countermeasure systems	☐Yes ☐No ☐NA	☐Yes ☐No ☐NA
112.11(j)	Detailed records are provided that describe surface and subsurface well shut-in valves and devices in use at the facility for each well.	Yes No NA	Yes No NA
	Records are sufficient to determine the method of activation or control, such as pressure differential, change in fluid or flow conditions, combination of pressure and flow, or manual or remote control mechanisms	Yes No NA	Yes No NA
112.11(k)	Blowout prevention (BOP) assembly and well control system installed before drilling below any casing string and during workover operations	Yes No NA	Yes No NA
	BOP assembly and well control system capable of controlling any well-head pressure that may be encountered while on the well	Yes No NA	☐Yes ☐No ☐NA
112.11(I)	Manifolds (headers) equipped with check valves on individual flowlines	☐ Yes ☐ No ☐ NA	☐Yes ☐No ☐NA
112.11(m)	If the shut-in well pressure is greater than the working pressure of the flowline and manifold valves up to and including the header valves, flowlines are equipped with a high pressure sensing device and shut-in valve at the wellhead, <b>OR</b> pressure relief system provided for flowlines	Yes No NA	Yes No NA
112.11(n)	Piping appurtenant to the facility is protected from corrosion, such as with protective coatings or cathodic protection	☐Yes ☐No ☐NA	☐Yes ☐No ☐NA
112.11(o)	Sub-marine piping appurtenant to the facility is protected against environmental stresses and other activities such as fishing operations	Yes No NA	Yes No NA
112.11(p)	Sub-marine piping maintained in good operating condition at all times. Piping periodically inspected or tested on a regular schedule for failures. Documentation of inspections or tests kept at facility.	Yes No NA	Yes No NA
Comments:			

ATTACHM	ENT A	□NA		PLAN	FIELD
ONSHORE F 112.8/112.12	ACILITIES (EXCLUDING PRODUCTION) 40 CFR				
112.8(b)/ 112.1	(2(b) Facility Drainage				
Diked Areas (1)	Drainage from diked storage areas is:     Restrained by valves, except where facility systems are designed to control such discharge, <u>OR</u> Manually activated pumps or ejectors are used and the		☐ Yes	□ No □ NA	☐ Yes ☐ No ☐ NA
	condition of the accumulation is inspected prior to draining dike to ensure no oil will be discharged	ng			
Comments:					
Bulk storage of prior to use, we storage conta	2(c) Bulk Storage Containers container means any container used to store oil. These containers are while being used, or prior to further distribution in commerce. Oil-filled einer. expectation containers are not present, mark this section Not Applicable (NA). If	electrical,	operating,	or manufacturing	g equipment is not a bulk
(1)	Containers materials and construction are compatible with material stored and conditions of storage such as pressure a temperature	-	-	□No □NA	
(3)	Is there drainage of uncontaminated rainwater from diked are into a storm drain or open watercourse?	eas	Yes	□ No □ NA	☐ Yes ☐ No ☐ NA
If YES	Bypass valve normally sealed closed			□ No □ NA	
	<ul> <li>Retained rainwater is inspected to ensure that its prese will not cause a discharge as described in §112.1(b)</li> </ul>	ence		□No □NA	
	Bypass valve opened and resealed under responsible supervision			□ No □ NA	
	<ul> <li>Adequate records of drainage are kept; for example, re required under permits issued in accordance with 40 C §§122.41(j)(2) and (m)(3)</li> </ul>	FR	☐ Yes	□ No □ NA	☐ Yes ☐ No ☐ NA
(4)	For completely buried metallic tanks installed on or after Jan 10, 1974 (if not exempt from SPCC regulation because subjeall of the technical requirements of 40 CFR part 280 or 281):	ect to			
	Provide corrosion protection with coatings or cathodic protection compatible with local soil conditions		☐ Yes	□ No □ NA	☐ Yes ☐ No ☐ NA
	Regular leak testing conducted		Yes	□No □NA	☐ Yes ☐ No ☐ NA
(5)	The buried section of partially buried or bunkered metallic tal protected from corrosion with coatings or cathodic protection compatible with local soil conditions		☐ Yes	□ No □ NA	☐ Yes ☐ No ☐ NA
Comments:					-

ATTACHMEN	IT A	PLAN	FIELD
(6)	Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs.  Techniques include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other system of non-destructive testing	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	Appropriate qualifications for personnel performing tests and inspections are identified in the Plan and have been assessed in accordance with industry standards	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	<ul> <li>The frequency and type of testing and inspections are documented, are in accordance with industry standards and take into account the container size, configuration and design</li> </ul>	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	<ul> <li>Comparison records of aboveground container integrity testing are maintained</li> </ul>	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	<ul> <li>Container supports and foundations regularly inspected</li> </ul>	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	<ul> <li>Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas</li> </ul>	Yes No NA	☐ Yes ☐ No ☐ NA
	<ul> <li>Records of all inspections and tests maintained<sup>11</sup></li> </ul>	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
Integrity Testing	Standard identified in the Plan:		
112.12 (c)(6)(ii)	Conduct formal visual inspection on a regular schedule for bulk storage containers that meet all of the following conditions:	Yes No NA	Yes No NA
(Applies to	Subject to 21 CFR part 110;     Have no external insulation; and		
AFVO Facilities only)	<ul><li>Elevated;</li><li>Shop-fabricated.</li><li>Constructed of austenitic</li></ul>		
	stainless steel;		
	In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas.	Yes No NA	Yes No NA
	You must determine and document in the Plan the appropriate qualifications for personnel performing tests and inspections. <sup>11</sup>	Yes No NA	Yes No NA
(10)	Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
112.8(d)/112.12	2(d)Facility transfer operations, pumping, and facility process		
(4)	Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly to assess their general condition	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	Integrity and leak testing conducted on buried piping at time of installation, modification, construction, relocation, or replacement	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
Comments:			

Records of inspections and tests kept under usual and customary business practices will suffice Offshore Oil Drilling, Production and Workover Facilities Page A-2 of 2

ATTACHM	ENT B NA	PLAN	FIELD		
ONSHORE O	IL PRODUCTION FACILITIES—40 CFR 112.9				
(Drilling and workover facilities are excluded from the requirements of §112.9)  Production facility means all structures (including but not limited to wells, platforms, or storage facilities), piping (including but not limited to flowlines or intra-facility gathering lines), or equipment (including but not limited to workover equipment, separation equipment, or auxiliary non-transportation-related equipment) used in the production, extraction, recovery, lifting, stabilization, separation or treating of oil (including condensate), or associated storage or measurement, and is located in an oil or gas field, at a facility. This definition governs whether such structures, piping, or equipment are subject to a specific section of this part.					
112.9(b) Oil Pr	oduction Facility Drainage				
(1)	At tank batteries, separation and treating areas where there is a reasonable possibility of a discharge as described in §112.1(b), drains for dikes or equivalent measures are closed and sealed except when draining uncontaminated rainwater. Accumulated oil on the rainwater is removed and then returned to storage or disposed of in accordance with legally approved methods	Yes No NA	Yes No NA		
	Prior to drainage, diked area inspected and action taken as provided below:				
	112.8(c)(3)(ii) - Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA		
	<ul> <li>112.8(c)(3)(iii) - Bypass valve opened and resealed under responsible supervision</li> </ul>	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA		
	<ul> <li>112.8(c)(3)(iv) - Adequate records of drainage are kept; for example, records required under permits issued in accordance with §122.41(j)(2) and (m)(3)</li> </ul>	☐ Yes ☐ No ☐ NA	Yes No NA		
(2)	Field drainage systems (e.g., drainage ditches or road ditches) and oil traps, sumps, or skimmers inspected at regularly scheduled intervals for oil, and accumulations of oil promptly removed	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA		
Bulk storage con	oduction Facility Bulk Storage Containers  tainer means any container used to store oil. These containers are used for p e being used, or prior to further distribution in commerce. Oil-filled electrical, o r.				
(1)	Containers materials and construction are compatible with material stored and conditions of storage such as pressure and temperature	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA		
(2)	Except as allowed for flow-through process vessels in §112.9(c)(5) and produced water containers in §112.9(c)(6), secondary containment provided for all tank battery, separation and treating facilities sized to hold the capacity of largest single container and sufficient freeboard for precipitation.	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA		
	Drainage from undiked area safely confined in a catchment basin or holding pond.	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA		
(3)	Except as allowed for flow-through process vessels in §112.9(c)(5) and produced water containers in §112.9(c)(6), periodically and upon a regular schedule, visually inspect containers for deterioration and maintenance needs, including foundation and supports of each container on or above the surface of the ground	☐ Yes ☐ No ☐ NA	Yes No NA		
(4) Comments:	pumper/gauger is delayed in making regularly scheduled  • High level rounds:	e vacuum protection to preve el sensors to generate and tra r where the facility is subject	ansmit an alarm to the		
Comments:					

ATTACHMENT	ГВ	PLAN	FIELD
(5)	Flow-through Process Vessels. Alternate requirements in lieu of six requirements in (c)(3) above for facilities with flow-through process versels.		ent required in (c)(2) and
(i)	Flow-through process vessels and associated components (e.g. dump valves) are periodically and on a regular schedule visually inspected and/or tested for leaks, corrosion, or other conditions that could lead to a discharge as described in §112.1(b)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(ii)	Corrective actions or repairs have been made to flow-through process vessels and any associated components as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(iii)	Oil removed or other actions initiated to promptly stabilize and remediate any accumulation of oil discharges associated with the produced water container	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(iv)	All flow-through process vessels comply with §§112.9(c)(2) and (c)(3) within six months of any flow-through process vessel discharge of more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b) or discharges of more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b) within any twelve month period. 12	Yes No NA	Yes No NA
112.9(d) Facili	ty transfer operations, pumping, and facility process		
(1)	All aboveground valves and piping associated with transfer operations are inspected periodically and upon a regular schedule to determine their general condition. Include the general condition of flange joints, valve glands and bodies, drip pans, pipe supports, pumping well polish rod stuffing boxes, bleeder and gauge valves, and other such items	☐ Yes ☐ No ☐ NA	Yes No NA
(3)	If flowlines and intra-facility gathering lines are not provided with secondary containment in accordance with §112.7(c) and the facility is not required to submit an FRP under §112.20, then the SPCC Plan includes:		
(i)	<ul> <li>An oil spill contingency plan following the provisions of 40 CFR part 109<sup>13</sup></li> </ul>	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(ii)	<ul> <li>A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that might be harmful</li> </ul>	Yes No NA	☐ Yes ☐ No ☐ NA
Comments:			

<sup>&</sup>lt;sup>12</sup> Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

<sup>13</sup> Note that the implementation of a 40 CFR part 109 plan does not require a PE impracticability determination for this specific requirement

ATTACHMENT	В	F	PLAN			FIELD	
(4)	A flowline/intra-facility gathering line maintenance program to prevent discharges is prepared and implemented and includes the following procedures:						
(i)	Flowlines and intra-facility gathering lines and associated valves and equipment are compatible with the type of production fluids, their potential corrosivity, volume, and pressure, and other conditions expected in the operational environment	Yes	□No	□na	☐ Ye	s 🗖 No	□NA
(ii)	Flowlines and intra-facility gathering lines and associated appurtenances are visually inspected and/or tested on a periodic and regular schedule for leaks, oil discharges, corrosion, or other conditions that could lead to a discharge as described in §112.1(b).	Yes	□No	□NA	☐ Ye	s 🗖 No	□NA
	If flowlines and intra-facility gathering lines are not provided with secondary containment in accordance with §112.7(c), the frequency and type of testing allows for the implementation of a contingency plan as described under 40 CFR 109 or an FRP submitted under §112.20	Yes	□No	□NA	☐ Ye	s 🗖 No	□NA
(iii)	Repairs or other corrective actions are made to any flowlines and intra-facility gathering lines and associated appurtenances as indicated by regularly scheduled visual inspections, tests, or evidence of a discharge	Yes	□No	□na	☐ Ye	s 🗖 No	□NA
(iv)	Oil removed or other actions initiated to promptly stabilize and remediate any accumulation of oil discharges associated with the produced water containers	Yes	□No	□NA	☐ Ye	s 🗖 No	□NA
ATTACHMEN	IT B NA	F	PLAN			FIELD	
ONSHORE 0 112.10	IL DRILLING AND WORKOVER FACILITIES—40 CFR						
112.10(b)	Mobile drilling or workover equipment is positioned or located to prevent a discharge as described in §112.1(b)	Yes	□No	□NA	☐ Ye	s 🗖 No	□NA
112.10(c)	Catchment basins or diversion structures are provided to intercept and contain discharges of fuel, crude oil, or oily drilling fluids	Yes	□No	□NA	☐ Ye	s 🗆 No	□NA
112.10(d)	Blowout prevention (BOP) assembly and well control system installed before drilling below any casing string or during workover operations					s 🗖 No	
	BOP assembly and well control system is capable of controlling any well-head pressure that may be encountered while on the well	Yes	□No	□NA	☐ Ye	s 🗖 No	□NA
Comments:							

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#### ATTACHMENT C: SPCC FIELD INSPECTION AND PLAN REVIEW TABLE

Documentation of Field Observations for Containers and Associated Requirements

Inspectors should use this table to document observations of containers as needed.

#### **Containers and Piping**

Check containers for leaks, specifically looking for: drip marks, discoloration of tanks, puddles containing spilled or leaked material, corrosion, cracks, and localized dead vegetation, and standards/specifications of construction.

Check aboveground container foundation for: cracks, discoloration, and puddles containing spilled or leaked material, settling, gaps between container and foundation, and damage caused by vegetation roots.

Check all piping for: droplets of stored material, discoloration, corrosion, bowing of pipe between supports, evidence of stored material seepage from valves or seals, evidence of leaks, and localized dead vegetation. For all aboveground piping, include the general condition of flange joints, valve glands and bodies, drip pans, pipe supports, bleeder and gauge valves, and other such items (Document in comments section of §112.11.)

#### Secondary Containment (Active and Passive)

Check secondary containment for: containment system (including walls and floor) ability to contain oil such that oil will not escape the containment system before cleanup occurs, proper sizing, cracks, discoloration, presence of spilled or leaked material (standing liquid), erosion, corrosion, penetrations in the containment system, and valve conditions.

Check dike or berm systems for: level of precipitation in dike/available capacity, operational status of drainage valves (closed), dike or berm impermeability, debris, erosion, impermeability of the earthen floor/walls of diked area, and location/status of pipes, inlets, drainage around and beneath containers, presence of oil discharges within diked areas.

Check drainage systems for: an accumulation of oil that may have resulted from any small discharge, including field drainage systems (such as drainage ditches or road ditches), and oil traps, sumps, or skimmers. Ensure any accumulations of oil have been promptly removed.

Check retention and drainage ponds for: erosion, available capacity, presence of spilled or leaked material, debris, and stressed vegetation.

Check active measures (countermeasures) for: amount indicated in plan is available and appropriate; deployment procedures are realistic; material is located so that they are readily available; efficacy of discharge detection; availability of personnel and training, appropriateness of measures to prevent a discharge as described in §112.1(b). Note that appropriate evaluation and consideration must be given to any use of active measures at an unmanned production facility.

Container ID/ General Condition <sup>14</sup> Aboveground or Buried Tank	Storage Capacity and Type of Oil	Type of Containment/ Drainage Control	Overfill Protection and Testing & Inspections

<sup>&</sup>lt;sup>14</sup> Identify each tank with either an A to indicate aboveground or B for completely buried

## ATTACHMENT C: SPCC FIELD INSPECTION AND PLAN REVIEW TABLE (CONT.)

**Documentation of Field Observations for Containers and Associated Requirements** 

Container ID/ General Condition <sup>15</sup> Aboveground or Buried Tank	Storage Capacity and Type of Oil	Type of Containment/ Drainage Control	Overfill Protection and Testing & Inspections

<sup>15</sup> Identify each tank with either an A to indicate aboveground or B for completely buried

### ATTACHMENT D: SPCC INSPECTION AND TESTING CHECKLIST

**Required Documentation of Tests and Inspections** 

Records of inspections and tests required by 40 CFR part 112 signed by the appropriate supervisor or inspector must be kept by all facilities with the SPCC Plan for a period of three years. Records of inspections and tests conducted under usual and customary business practices will suffice. Documentation of the following inspections and tests should be kept with the SPCC Plan.

		Docum	Not	
	Inspection or Test	Present	Not Present	Applicable
112.7-Gener	al SPCC Requirements			
(d)	Integrity testing for bulk storage containers with no secondary containment system and for which an impracticability determination has been made			
(d)	Integrity and leak testing of valves and piping associated with bulk storage containers with no secondary containment system and for which an impracticability determination has been made			
(h)(3)	Inspection of lowermost drain and all outlets of tank car or tank truck prior to filling and departure from loading/unloading rack			
(i)	Evaluation of field-constructed aboveground containers for potential for brittle fracture or other catastrophic failure when the container undergoes a repair, alteration, reconstruction or change in service or has discharged oil or failed due to brittle fracture failure or other catastrophe			
k(2)(i)	Inspection or monitoring of qualified oil-filled operational equipment when the equipment meets the qualification criteria in §112.7(k)(1) and facility owner/operator chooses to implement the alternative requirements in §112.7(k)(2) that include an inspection or monitoring program to detect oil-filled operational equipment failure and discharges			
112.11-Offsh	ore oil drilling, production and workover facilities			
(c)	Regularly scheduled preventive maintenance inspection and testing program to assure reliable operation of liquid removal system and pump start-up device			
(i)	Testing and inspection of pollution prevention equipment and systems performed on a scheduled periodic basis. Simulated discharges are used for testing and inspecting human and equipment pollution control and countermeasure systems			
(p)	Submarine piping periodically inspected or tested for failures			
112.8/112.12-	-Onshore Facilities (excluding oil production facilities)			□NA
(b)(1), (b)(2)	Inspection of storm water released from diked areas into facility drainage directly to a watercourse			
(c)(3)	Inspection of rainwater released directly from diked containment areas to a storm drain or open watercourse before release, open and release bypass valve under supervision, and records of drainage events			
(c)(4)	Regular leak testing of completely buried metallic storage tanks installed on or after January 10, 1974 and regulated under 40 CFR 112			
(c)(6)	Regular integrity testing of aboveground containers and integrity testing after material repairs, including comparison records			
(c)(6), (c)(10)	Regular visual inspections of the outsides of aboveground containers, supports and foundations			
(c)(6)	Frequent inspections of diked areas for accumulations of oil			
(d)(4)	Regular inspections of aboveground valves, piping and appurtenances and assessments of the general condition of flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces			
(d)(4)	Integrity and leak testing of buried piping at time of installation, modification, construction, relocation or replacement			

112.9-Onsho	re Oil Production Facilities (excluding drilling and workover facilities)		□NA
(b)(1)	Rainwater released directly from diked containment areas inspected following §§112.8(c)(3)(ii), (iii) and (iv), including records of drainage kept		
(b)(2)	Field drainage systems, oil traps, sumps, and skimmers inspected regularly for oil, and accumulations of oil promptly removed		
(c)(3)	Containers, foundations and supports inspected visually for deterioration and maintenance needs		
(c)(5)(i)	In lieu of having sized secondary containment, flow-through process vessels and associated components visually inspected and/or tested periodically and on a regular schedule for conditions that could result in a discharge as described in §112.1(b)		
(d)(1)	All aboveground valves and piping associated with transfers are regularly inspected		
(d)(4)(ii)	For flowlines and intra-facility gathering lines without secondary containment, in accordance with §112.7(c), lines are visually inspected and/or tested periodically and on a regular schedule to allow implementing the part 109 contingency plan or the FRP submitted under §112.20		
Comments:			

#### ATTACHMENT E: SPCC CONTINGENCY PLAN REVIEW CHECKLIST

		_										
<b>4</b> 0	CFR	Part	109_	Criteria	for State	I ocal	and R	lanoina!	Oil	Removal	Contingen	cv Plans
TV	$\mathbf{v}_{\mathbf{i}}$	ıaıı	103	Officia	TOI Otate.	Local	and i	<b>C</b> GIOHAI	VII.	INCIIIO Vai	OULLIIMELI	CV I IAIIS

If SPCC Plan includes an impracticability determination for secondary containment in accordance with §112.7(d), the facility owner/operator is required to provide an oil spill contingency plan following 40 CFR part 109, unless he or she has submitted a FRP under §112.20. An oil spill contingency plan may also be developed, unless the facility owner/operator has submitted a FRP under §112.20 as one of the required alternatives to general secondary containment for qualified oil filled operational equipment in accordance with §112.7(k).

109.5-	Development and implementation criteria for State, local and regional oil removal contingency plans <sup>16</sup>	Yes	No
(a)	Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.		
(b)	Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:		
(1)	The identification of critical water use areas to facilitate the reporting of and response to oil discharges.		
(2)	A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.		
(3)	Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., National Contingency Plan (NCP)).		
(4)	An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.		
(c)	Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:		
(1)	The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.		
(2)	An estimate of the equipment, materials and supplies that would be required to remove the maximum oil discharge to be anticipated.		
(3)	Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.		
(d)	Provisions for well-defined and specific actions to be taken after discovery and notification of an oil discharge including:		
(1)	Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.		
(2)	Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.		
(3)	A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.		
(4)	Provisions for varying degrees of response effort depending on the severity of the oil discharge.		
(5)	Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.		
(e)	Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.		

\_\_

■ NA

<sup>&</sup>lt;sup>16</sup> The contingency plan should be consistent with all applicable state and local plans, Area Contingency Plans, and the NCP.

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### **ATTACHMENT F: ADDITIONAL COMMENTS**

# ATTACHMENT F: ADDITIONAL COMMENTS (CONT.)

### **ATTACHMENT G: PHOTO DOCUMENTATION NOTES**

Photo#	Photographer Name	Time of Photo Taken	Compass Direction	Description

# **ATTACHMENT G: PHOTO DOCUMENTATION NOTES (CONT.)**

Photo#	Photographer Name	Time of Photo Taken	Compass Direction	Description