



## SWPPP verses SPCC? What is the difference and does my facility need one?

Ever wondered what the odds are of finding a four leaf clover at an industrial site? Well according to the statistics, the odds of finding a four-leaf clover, *anywhere*, on the first try, is 10,000 to 1. One would think that the odds would increase at least 1000 fold if you were trying to find a four-leaf clover at an industrial site! You'd need the luck of the Irish to find one with these kinds of odds.

This month is Saint Patrick's Day. On March 17<sup>th</sup>, everyone has a chance to be an Irishman (or woman) for one day. Even so, don't stretch your luck! It's easier to pass an audit by keeping your industrial Storm Water Pollution Prevention Plan (SWPPP) up to date, than to rely upon the luck of the Irish to pass an audit.



Let's say you've kept the key components of your SWPPP in great shape. You're feeling totally confident that your facility would pass an audit. But think again! Are all the bases covered?

When an auditor arrives on-site to conduct an audit, that person will be looking at the big picture. In other words, is every aspect of the facility covered from an audit perspective?

Does your facility require a Spill Prevention Control and Countermeasures Plan (SPCC)? You ask yourself, 'what is an SPCC'? What is the difference between an SPCC Plan and a SWPPP? The aim of this months Newsletter is to briefly answer these questions and to provide you with some resources that will help you to determine if your industrial facility requires an SPCC Plan, in conjunction with your industrial SWPPP.

In layman's terms, the industrial SWPPP deals with the prevention of on-site pollutants, generated from industrial activities, from getting into the sewer system or discharged from an outfall. Whereas the SPCC plan deals with preventing catastrophic spillage of petroleum products from above or below ground holding tanks.

Unlike most environmental regulatory programs, ***no "permit" or registration is required if you need an SPCC plan.*** You simply must prepare and implement one. Furthermore, most states in the US do not administer the SPCC program, leaving it instead up to the Federal USEPA.

An SPCC plan requires several things from a facility, including (but not limited to):

- **A thorough evaluation of all petroleum products stored at the facility, and the likelihood of them spilling.**
- **Practices to ensure that the chance of petroleum products spills is minimized, including secondary containment for all petroleum containers, presence of spill cleanup and control materials, and adequate security.**
- **Regular documented inspections of all petroleum products containers and their piping usually required monthly.**
- **Training, at least annually, for all employees involved in petroleum products handling.**

An SPCC plan is required by Federal law if you have over **1,320 gallons of any type of petroleum products** at your plant. This means diesel, gasoline, fuel oil, heating oil, motor oil, used oil, lube oil, gear oil, form release oil, etc. Admixtures are **NOT** included, since they aren't a petroleum product. Because of the low threshold, most plants need one.

The penalties for not having an SPCC plan can be **severe**, and are part of the focus of the USEPA enforcement effort targeting industrial facilities.



**Remember; Don't rely upon that 1 in 10,000 chance that luck will get you through your next audit. You can ensure your facility's success by taking the appropriate action to keep your company audit ready! If you are in need of an SPCC plan, get one NOW! Let us know if we can be of any help.**

For more information about SPCC Plans or help to determine whether or not your facility needs one, you can use the following resources at the EPA website.

[http://www.epa.gov/oem/content/spcc/spcc\\_guidance.htm](http://www.epa.gov/oem/content/spcc/spcc_guidance.htm)

The screenshot shows the EPA website's Emergency Management section. The main heading is "Spill Prevention, Control, and Countermeasure (SPCC) Guidance for Regional Inspectors". Below the heading, there is a "CORRECTION AND UPDATE NOTICE" box stating that the guidance document is being updated to reflect regulatory changes. A "Quickfinder" sidebar on the right lists various resources such as "Border Programs", "CAMEO", "EPCRA", "Facility Response Plan", "Freshwater Spills Symposia", "Hurricanes", "LEPCs", "List of Lists", "Local Governments", "Reimbursement", "National Response System", "NCP Product Schedule", "Natural Disasters", "Regional Contacts", "Risk Management Plan", "RMP's Submit", "SERCS", "SPCC Rule", "Tier 2 Submit", and "More...".



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## We Have a February Contest Winner!

Larry Eshelman submitted the winning answer!

The question was ... **What is an unauthorized non-storm water discharge? Give a couple examples.**



Unauthorized Discharges (Such as wash or rinse water) that do not meet the conditions provided in Section D (pages 5-6) of the General Permit. Examples: (1) Truck Washing and (2) Washing off the plant yard.

**LARRY WON A \$25 GIFT CARD TO EL POLLO LOCO**



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## Draft Industrial Permit Update... Standby!!!

The California Storm Water Quality Association reports ...

The revised draft Industrial General Permit is planned to be re-released during the 1<sup>st</sup> quarter 2012 with a hearing possibly in the 2<sup>nd</sup> quarter. The State Water Board is evaluating how to include TMDL allocations assigned to industrial dischargers. One possible approach would be to reopen the permit after adoption to add TMDL requirements by each Regional Board. CASQA states that TMDL allocations would need to be clearly translated into industry-specific requirements.



### Lucky's Lucky Corned Beef and Cabbage



"A nice bowl of Lucky's corned beef and cabbage will bring you luck on St. Patrick's Day or any cold day. Serve in a big bowl with bread of your choice. I like Irish soda bread with it." By: luckysnightmare

#### Ingredients

- 1 (3 pound) corned beef brisket with spice packet
- 1 head cabbage, cored and coarsely chopped
- 6 medium potatoes, peeled and cubed
- 1 (1.5 fluid ounce) jigger Irish whiskey



#### Directions

Place the beef brisket and contents of the spice packet into a pot and fill with enough water to cover. Bring to a boil, cover, and cook over low heat for about 2 hours. Add the cabbage and potatoes, and simmer over low heat for 2 more hours. Stir in the whiskey when it is almost done. Check the water level occasionally and replace as needed.





### Industrial Stormwater General Permit!

Did you know that the Industrial Stormwater General Permit is a National Pollutant Discharge Elimination System (NPDES) permit that regulates discharges associated with ten broad categories of industrial activities? The State Water Resources Control Board requires businesses conducting activities falling under specific Standard Industrial Classification (SIC) codes to apply for and gain coverage under the Industrial Stormwater General Permit.

*A business's responsibility to file for coverage under the Industrial Stormwater General Permit is not limited to the SIC code of its primary business activity. Secondary, tertiary or incidental activities may result in the requirement to obtain coverage.*

**If you haven't done so already, come visit our BMP Outlet. Our site has a new look and feel. Ordering BMPs from our website has gotten easier!!! We are here to help you stay in compliance and maintain your BMPs, the heart of any Stormwater Pollution Prevention Plan...**



**You can visit us at –  
*bmpoutlet.com*  
Our prices will save you  
money!!!**



### **“To Do List” for March:**

- Monthly Storm Water Observations (Form 4)
- Storm Water Sampling - If you haven't yet done so, try to get your second sample.)
- Quarterly Non-Storm Water Observations sometime between now and March 30 (Forms 2 & 3)
- **Inspect your BMPs and make sure they are maintained and functional...**
- **Make sure your SWPPP is audit ready!**



## Need Some Help? Give us a call!

Don't depend on the luck of the Irish to keep your company in compliance and audit ready. Let the professionals at WGR come check out your storm water program and give you a synopsis of its condition. Our check up includes a facility inspection, review of the SWPPP, the previous annual report, and this year's sampling and monitoring data. We will provide you a confidential report on what needs attention and recommended improvements.



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## March Storm Water Contest

By March 31, submit a response for the following:



How long should storm water records including annual reports, observations, analytical results, and maintenance records be retained?

All persons submitting correct answers will be placed in a drawing. The winner will receive a \$25 gift card to **Chili's**. Please submit your entries to [jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com).

*Please contact us if you have any questions ...*

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**Technical Questions about Storm Water Compliance? Call ...**

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