

SUMMARY OF FINDINGS

Not following SPCC Plan Requirements, what will the EPA fines cost you!
These fines are civil fines that are not related to organizations that are not cooperative with the EPA after being inspected or has a reportable release of oil materials.

Another note is that in 2010 all fines were raised 50%. These are only a few of the items. Every violation of these regulations has its own fine associated with that particular violation.

What you will pay if you don't have or do. Expect multiple violations for each inspection. A short list of items:

GENERAL TOPICS:

No Spill Prevention Control and Countermeasure Plan (SPCC) -	\$1,500.00
Plan not certified by a professional engineer- Certification lacks one or more required elements	450.00
No management approval of plan-	100.00
Plan not maintained on site or not available for review	450.00
Amendment(s) not certified by a professional engineer-	300.00
Plan does not discuss alternative environmental protection to SPCC requirements-	150.00
Plan has inadequate or no description and procedures to use when a discharge may occur	200.00
Plan does not discuss and facility does not implement appropriate containment diversionary structures/equipment	150.00
No contingency plan	400.00
No written commitment of manpower, equipment, and materials	150.00

QUALIFIED FACILITY REQUIREMENTS:

Qualified Facility: No Self certification-	450.00
Qualified Facility: Self certification lacks required elements-	100.00
Qualified Facility: Technical amendments not certified-	150.00
Qualified Facility: Environmental Equivalence or Impracticability not certified by PE-	350.00

WRITTEN PROCEDURES AND INSPECTION RECORDS

No Inspection records were available for review -	200.00
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PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES

No training on the operation and maintenance of equipment to prevent discharges and or facility operations	75.00
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SECURITY (excluding Production Facilities)

Master flow and drain valves that permit direct outward flow to the

surface are not secured in closed position when in a non-operating or standby status- 300.00

FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING

Inadequate containment for Loading Area 400.00

Inadequate secondary containment, and/or rack drainage does not flow to catchment basin, treatment system, or quick drainage system 750.00

Containment system does not hold at least the maximum capacity of the largest single compartment of any tank car or tank truck- 450.00

There are no interlocked warning lights, physical barrier system, or warning signs, or vehicle brake interlock system to prevent vehicular departure before complete disconnect from transfer line 300.00

FACILITY DRAINAGE

Secondary Containment circumvented due to containment bypass valves left open and/or pumps and ejectors not manually activated to prevent a discharge- 600.00

Dike water is not inspected prior to discharge and/or valves not open & resealed under responsible supervision- 450.00

Drainage from undiked areas do not flow into catchment basins ponds, or lagoons, or no diversion systems to retain or return a discharge to the facility- 450.00

BULK STORAGE CONTAINERS

Material and construction of tanks not compatible to the oil stored and the conditions of storage such as pressure and temperature- 450.00

Secondary containment appears to be inadequate 750.00

Containment systems, including walls and floors are not sufficiently impervious to contain oil- 375.00

Walls of containment system slightly eroded or have low areas 300.00

Aboveground tanks are not subject to visual inspections 450.00

Aboveground tanks are not subject to periodic integrity testing, such as hydrostatic, nondestructive methods, etc. 450.00

Effluent treatment facilities which discharge directly to navigable waters are not observed frequently to detect oil spills-..... 150.00

Causes of leaks resulting in accumulations of oil in diked areas are not promptly corrected 450.00

Secondary containment inadequate for mobile or portable storage tanks 500.00

FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITY PROCESS

Corrective action is not taken on exposed sections of buried piping when deterioration is found- 450.00

Aboveground valves, piping and appurtenances are not inspected regularly 300.00

Periodic integrity and leak testing of buried piping is not conducted 150.00