We recently reviewed the EPA Inspection database and found where they had recently inspected 10 facilities in one business group, finding 6 with no SPCC Plans and there were 3 SPCC Plans that were not reviewed in the five-year period as required.  Yes, even the 10th one that actually had the SPCC plan was fined for not doing the integrity testing of the tanks when needed. There was no need for any of them to fail.   
   
There were additional fines within these other facilities for not having tank integrity testing performed on their AST's when it was needed. Two of the facilities had spills/releases and receiving exceptionally large fines for not having the plan with these spills/releases.   
   
All Six facilities without plans also had other violations related to bulk container secondary containment, monthly inspections, and training. Probably because they did not understand the SPCC Plan requirements, that they would have known about if they had had a SPCC Plan.   
   
In the past five years we have worked with countless operations/facilities with Environmental Programs like this SPCC program along with Steel Tank Inspections. These plans save/protect life & limb, money, the environment, as well as your company image and are required when certain criteria are met.   
   
If you have questions related to the SPCC Plans, its requirements, or if you would like a quote for a site specific plan, we can help.