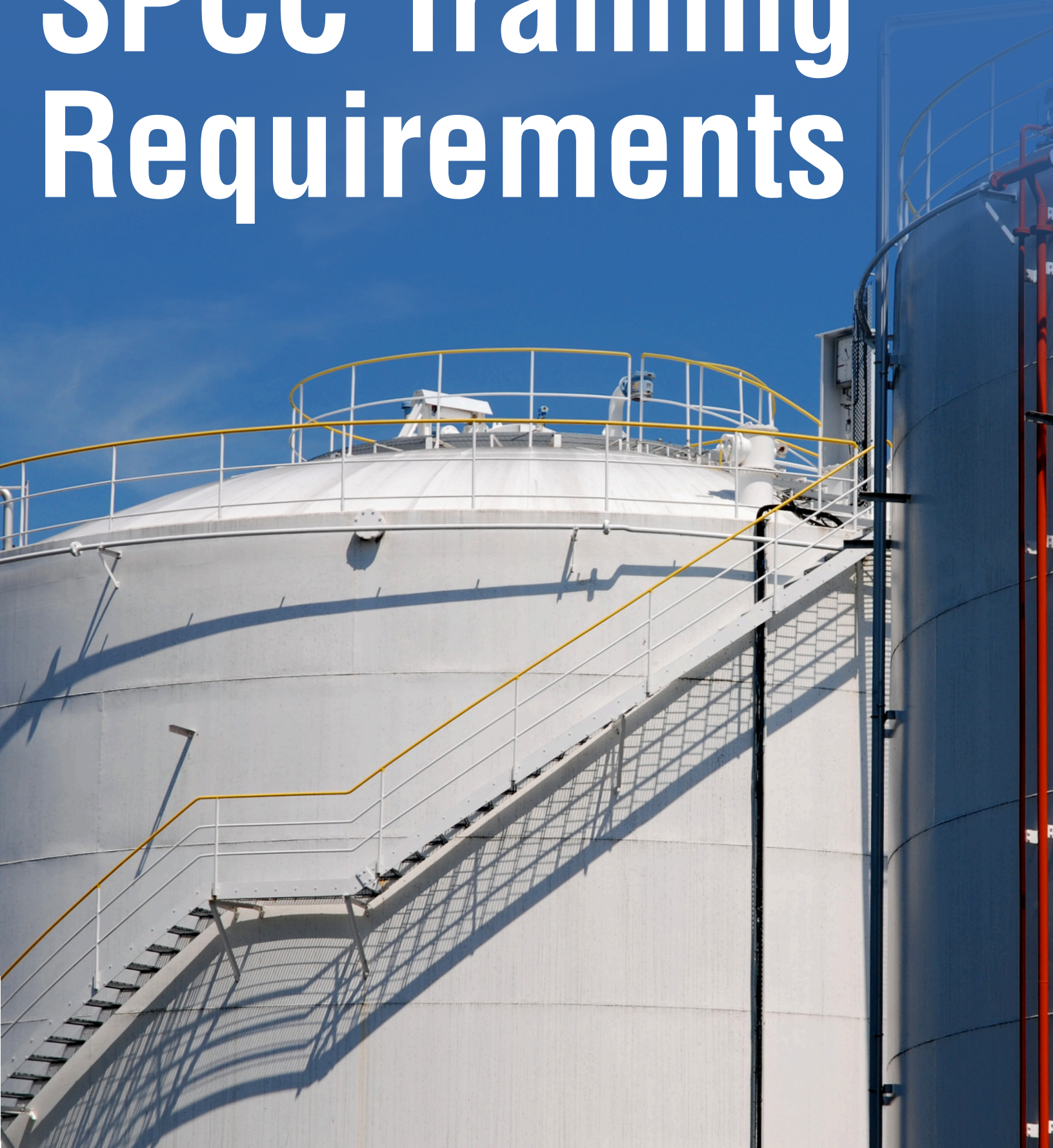


SPCC Training Requirements



SPCC TRAINING REQUIREMENTS

You've developed and implemented a Spill Prevention, Control, and Countermeasure (SPCC) Plan that meets all federal SPCC regulatory requirements. You've put into action an inspection program that is well documented in your Plan, and you've made sure that all secondary containment is sufficient to prevent an oil discharge to navigable waters and adjoining shorelines. It sounds like your facility is fully compliant with the SPCC regulations, right? But unless you have implemented a training program and are routinely training new and existing oil-handling personnel, you are not fully in compliance.

SPCC plans are a cornerstone of the U.S. Environmental Protection Agency's (EPA) strategy to prevent oil spills from reaching U.S. waters. Unlike oil spill contingency plans that typically address spill cleanup measures after a spill has occurred, SPCC plans ensure that facilities put in place containment and other countermeasures that would prevent oil spills from reaching navigable waters. In order for spill prevention, containment, and countermeasures to work properly, employees must be trained to ensure the measures are installed, operated, and maintained.

Oil-handling personnel

The SPCC regulations require that all oil-handling personnel at SPCC-regulated facilities be trained. "Oil-handling personnel" is interpreted according to industry standards, but this includes employees engaged in the operation and maintenance of oil storage containers or the operation of equipment related to storage containers and emergency response personnel. Oil-handling contractors at a facility must be trained as well as permanent employees.



Training content

SPCC training should include:

- An overview of the SPCC regulations and related pollution prevention regulations;
- General facility operations;
- Contents of the facility SPCC Plan;
- Oil storage, transfer, and handling equipment on-site, including secondary containment structures;
- Secondary containment failures and what conditions require a spill report;
- Security measures on-site and description of potentially suspicious situations; *and*
- Discharge procedure protocols and expectations of first responder actions.

Training objectives

After SPCC training, employees must be able to:

- Explain the reason for the SPCC Plan.
- Follow proper containment practices for oil storage equipment.
- Describe causes of secondary containment structure failures, and explain the importance of limiting rainwater and debris in structures.
- Describe problems and/or conditions that should be reported.
- Follow safety procedures and list the facility's security features.
- Follow appropriate discharge procedures, and identify the first step to take when a spill or release is discovered.

Training format

Trainers have flexibility with training formats. Trainers may use hands-on demonstration, classroom, and any other method of training that leads to comprehension and understanding of the facility's SPCC Plan and how it is implemented. There should be an opportunity for trainees to ask questions and receive answers from the person conducting the training session.

When preparing for a training session, the presenter should have the following materials available for review by employees:

- A copy of the SPCC Plan and Facility Response Plan (FRP), if applicable;

- Copies of your facility's Emergency Response Action Plan;
- Copies of facility diagrams;
- Examples of spill control equipment your facility has available on-site or pictures or videos of the equipment; *and*
- Copies of handouts to reinforce the training.

Trainer qualifications

The person conducting the training must be knowledgeable in the subject matter covered by the elements contained in the training program generally and as it relates specifically to the facility that the training will address and qualified to implement the components of the SPCC Plan or FRP that he or she will address in the training. There is no certification or licensure requirement for SPCC trainers.



Refresher training

Spill prevention briefings must be conducted at least once per year to ensure understanding of a facility's SPCC Plan. The briefings must highlight and describe known discharges or failures, malfunctioning components, and any recently developed precautionary measures. Training should also be conducted whenever there is a substantial change in your SPCC Plan, a discharge occurs at the facility, or new equipment or secondary containment is installed.

Training Checklist

A training session is successful only if objectives are met. After a training session, ask the following questions to ensure that all content areas were adequately covered and that all attendees received all necessary information.

- Are employees familiar with spill prevention procedures?
- Are employees familiar with spill prevention and control equipment used at the facility?
- Does your facility have written procedures for inspecting and testing oil spill containment systems?
- Have appropriate personnel been properly instructed in the operation and maintenance of equipment to prevent the discharge of oil?
- Do employees know how to contact the facility's emergency response coordinator?
- Do employees know the facility's notification procedures and communication systems to be used for notification?



- Are employees certain of their duties and responsibilities in the event of a spill?
- Do employees know the procedures to mitigate or prevent any discharge or substantial threat of a discharge of oil?
- Have you pointed out the location of all spill response equipment?
- Is the spill response equipment easily accessible and in good working order?
- Do employees know their duties in the event of a facility shutdown?
- Do employees know their duties regarding equipment start-up after a power outage?
- Have you maintained records of completed SPCC training exercises?
- Are training logs maintained at the facility for drills, exercises, and response training?

Testing

SPCC regulations do not require you to formally test workers on SPCC knowledge. However, it is good idea for you to make sure that your workers understand your SPCC training. An EPA inspector will typically talk to field workers during an inspection to test the depth of their understanding of your SPCC training. Workers who can't speak to the specifics of the SPCC Plan at your facility could be deemed not trained by the EPA and could subject your facility to training violations and fines.

Recordkeeping

The SPCC regulations do not require that records be kept of training sessions and content. However, maintaining records of SPCC training with your SPCC Plan will help demonstrate the extent to which training requirements are met.



And if you don't train?

EPA inspectors will notice. Not creating a training program and failing to properly train oil-handling personnel can result in fines, even if a discharge does not occur.