



By: *Eileen Pannetier*  
*CEI President*

*CEI Feature Article*

## SPCC Plans: Protecting Your Bottom Line

In recent years I've witnessed large scale oil spills dominate news cycles on a national and in some cases global scale. Whenever an incident becomes public and is scrutinized, I examine our own internal approach to assisting our clients in developing plans and a system to avoid such an incident. I too often see businesses take a cavalier approach to developing a clear and implementable program to prevent spills at their facilities. The same holds true about staff education and training.

The ramifications are too great not to have spill prevention and emergency procedures that are implemented on a daily basis. Any facility with more than 1,320 gallons of aboveground oil storage capacity, with few exceptions, must develop and implement a Spill Prevention and Countermeasure Control (SPCC) Plan per the U.S. Environmental Protection Agency (EPA) guidelines. Simply put, a solid, site specific plan can help prevent spills. Plans must be updated at least every 5 years by a Registered Professional Engineer and/or whenever there are material changes at the facility.

The quality of SPCC Plans differ dramatically. Generic, cut and paste, boilerplate plans are simply put – a liability. I was recently asked to review an SPCC Plan for a client. The SPCC Plan was four pages long and was not accompanied by any type of site map or facility drawing. How could a PE have stamped this? As it turns out, the PE stamped it indicating that the material outlined in the plan was accurate. It was not stamped to indicate it actually COMPLIED with EPA's SPCC Plan requirements. How clever. My client was under the impression they had an SPCC Plan that kept them in regulatory compliance and protected their investment as far as spill prevention. It did neither.

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**Y**es, cleaning up spills can be costly and this alone should be motivation enough to invest in a well put together plan and a few hands on training sessions, but it all too often isn't. Moreover, many don't realize the hidden costs associated with a poorly developed SPCC Plan that fails to both prevent an emergency and aid in an emergency. In addition to short and long-term remediation costs there are monitoring costs, offsite cleanup and restoration costs if the material impacts adjacent properties, Federal, state and local fines, offline facility costs and downtime ramifications, negative press and publicity, and in some cases employee injury claims, lost wages, and lawsuits. And now you have a piece of property that will forever show up in databases as having been contaminated by a spill and this will be noted in every future lease and or property transaction.

**U**ltimately, the issue is not if your SPCC Plan will affect your bottom line, rather when will it? And what side of the ledger will it put you on? Give your SPCC Plan the attention it deserves when it comes time to review and update it – as explained above, there are many different levels of effort and approaches that can be taken to prepare this very important document and unfortunately this encourages underqualified low cost competitors to enter the market. Ultimately, be sure to compare qualifications, ask for samples, and check references to make an informed decision.

For more information about CEI's Spill Prevention and Countermeasure Control (SPCC) Planning, please contact Rick Cote, P.E., LSP directly at 800.725.2550 x302 or [rcote@ceiengineers.com](mailto:rcote@ceiengineers.com) or Rebecca Balke, P.E., LEP at x308 or [rbalke@ceiengineers.com](mailto:rbalke@ceiengineers.com)

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