



**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
**SPCC FIELD INSPECTION AND PLAN REVIEW CHECKLIST**  
FOR USE AT OFFSHORE DRILLING, PRODUCTION, AND WORKOVER FACILITIES

## Overview of the Checklist

This checklist is designed to assist EPA inspectors in conducting a thorough and consistent inspection of a facility's compliance with the Spill Prevention, Control, and Countermeasure (SPCC) rule at 40 CFR part 112. It is a tool to help federal inspectors (or their contractors) record observations during the site visit and review of the SPCC Plan. While the checklist is comprehensive, the inspector should always refer to the SPCC rule in its entirety, the *SPCC Regional Inspector Guidance Document*, and other relevant guidance for evaluating compliance. This checklist must be completed in order for an inspection to count toward an agency measure (i.e., OEM/OECA inspection measures or GPRA).

The checklist is organized according to the SPCC rule. Each item in the checklist identifies the relevant section and paragraph in 40 CFR part 112 where that requirement is stated. Sections 112.1 through 112.5 specify the applicability of the rule and requirements for the preparation, implementation, and amendment of SPCC Plans. For these sections, the checklist includes data fields to be completed, as well as several questions with "yes" or "no" answers.

Sections 112.7 through 112.11 specify requirements for spill prevention, control, and countermeasures. For these sections, the inspector needs to evaluate whether the requirement is addressed adequately or inadequately in the SPCC Plan and whether it is implemented adequately in the field (either by field observation or record review). For the SPCC Plan and implementation in the field, if a requirement is addressed adequately, mark the "Yes" box in the appropriate column. If a requirement is not addressed adequately, mark the "No" box. If a requirement does not apply to the particular facility, mark the "NA" box. If a provision of the rule applies only to the SPCC Plan, the "Field" column is shaded.

Space is provided in each section to record comments. Additional space is available on the comments page at the end of the checklist. Comments should remain factual and support the evaluation of compliance.

Appendix A is for recording information about containers and other locations at the facility that require secondary containment.

Appendix B is a checklist for documentation of the tests and inspections the facility operator is required to keep with the SPCC Plan.

Appendix C is a checklist for oil removal contingency plans. A contingency plan is required if a facility determines that secondary containment is impracticable as provided in 40 CFR 112.7(d).



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FACILITY INFORMATION			
FACILITY NAME:			
ADDRESS:		LAT:	LONG:
CITY:	STATE:	ZIP:	COUNTY:
TELEPHONE:	FACILITY REPRESENTATIVE NAME:		
OWNER NAME:			
OWNER ADDRESS:			
CITY:	STATE:	ZIP:	
TELEPHONE:	OWNER CONTACT PERSON:		
FACILITY OPERATOR NAME (IF DIFFERENT FROM OWNER – IF NOT, PRINT "SAME"):			
OPERATOR ADDRESS:			
CITY:	STATE:	ZIP:	
TELEPHONE:	OPERATOR CONTACT PERSON:		
FACILITY TYPE:		NAICS CODE:	
HOURS PER DAY FACILITY ATTENDED:		TOTAL FACILITY CAPACITY:	
TYPE(S) OF OIL STORED:			
IS FACILITY LOCATED IN INDIAN COUNTRY? <input type="checkbox"/> YES <input type="checkbox"/> NO IF YES, RESERVATION NAME:			
INSPECTION INFORMATION			
INSPECTION DATE:	TIME:	INSPECTION NUMBER:	
LEAD INSPECTOR:			
OTHER INSPECTOR(S):			
INSPECTOR ACKNOWLEDGMENT			
<i>I performed an SPCC inspection at the facility specified above.</i>			
INSPECTOR SIGNATURE:			DATE:

**GENERAL APPLICABILITY—40 CFR 112.1**

IS THE FACILITY REGULATED UNDER 40 CFR part 112?

The completely buried oil storage capacity is over 42,000 gallons, **OR** the aggregate aboveground oil storage capacity is over 1,320 gallons  Yes  No **AND**

The facility is a non-transportation-related facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States (as defined in 40 CFR 110.1).  Yes  No

AFFECTED WATERWAY(S):

DISTANCE:

PATH:

*Note: The following storage capacity is not considered in determining applicability of SPCC requirements:*

- Completely buried tanks subject to all the technical requirements of 40 CFR part 280 or a state program approved under 40 CFR part 281.
- Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993.
- Any facility or part thereof used exclusively for wastewater treatment (production, recovery or recycling of oil is not considered wastewater treatment).
- Containers smaller than 55 gallons.
- Permanently closed containers.

Does the facility have an SPCC Plan?

 Yes  No

Comments:

**REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC PLAN—40 CFR 112.3**

Date facility began operations:

Date of initial SPCC Plan preparation:

Current plan version (date/number):

- 112.3(a) For facilities in operation prior to August 16, 2002:
- Plan amended by February 17, 2006  Yes  No  NA
  - Amended Plan implemented by August 18, 2006  Yes  No  NA
- For facilities beginning operation between August 17, 2002, and August 18, 2006, Plan prepared and fully implemented by August 18, 2006  Yes  No  NA

- 112.3(b) & (c) For facilities beginning operation after August 18, 2006, Plan prepared and fully implemented before beginning operations  Yes  No  NA

112.3(d) Professional Engineer certification includes statement that the PE attests:

- PE is familiar with the requirements of 40 CFR part 112  Yes  No
- PE or agent has visited and examined the facility  Yes  No
- Plan is prepared in accordance with good engineering practice including consideration of applicable industry standards and the requirements of 40 CFR part 112  Yes  No
- Procedures for required inspections and testing have been established  Yes  No
- Plan is adequate for the facility  Yes  No

PE Name:

License No.:

State:

Date of certification:

- 112.3(e) Plan available onsite if facility is attended at least 4 hours/day (If located at nearest field office, please note contact information below.)  Yes  No  NA

Comments:

**AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112.4**

- 112.4(a) Has the facility discharged a reportable quantity of oil in amounts considered harmful: more than 1,000 gallons of oil in a single discharge or more than 42 gallons in each of two discharges in any 12-month period (see 40 CFR part 110)?  Yes  No
- If yes, was information submitted to the RA as required in §112.4(a)?  Yes  No  NA
  - Date(s) of reportable discharge(s):
  - Were they reported to the NRC?  Yes  No  NA
- 112.4(d), (e) Have changes required by the RA been implemented in the Plan and/or facility?  Yes  No  NA

Comments:

**AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5**

- 112.5(a) Has there been a change at the facility that materially affects the potential for a discharge?  Yes  No  NA
- If so, was the Plan amended within six months of the change?  Yes  No  NA
- 112.5(b) Review and evaluation of the Plan documented at least once every 5 years?  Yes  No  NA
- Following Plan review, and if amendment was required, was Plan amended within six months to include more effective prevention and control technology, if available?  Yes  No  NA
- 112.5(c) Professional Engineer certification of any technical Plan amendments in accordance with §112.3(d)  Yes  No  NA

Name:	License No.:	State:	Date of certification:
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Reason for amendment:

Amendments implemented within six months of any Plan amendment  Yes  No  NA

Comments:

INDICATE IF ITEM IS ADDRESSED ADEQUATELY (Yes), INADEQUATELY (No), OR IS NOT APPLICABLE (NA) IN PLAN AND FIELD.

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
Management approval at a level of authority to commit the necessary resources to fully implement the Plan <input type="checkbox"/> Yes <input type="checkbox"/> No			
Name:		Title:	Date:
Plan follows sequence of the rule or provides a cross-reference of requirements in the Plan and the rule		<input type="checkbox"/> Yes <input type="checkbox"/> No	
If Plan calls for facilities, procedures, methods, or equipment not yet fully operational, details of their installation and start-up are discussed ( <i>Note: Relevant for inspection evaluation and testing baselines.</i> )		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
112.7(a)(2)	If there are deviations from the requirements of the rule, the Plan states reasons for nonconformance	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
	Alternative measures described in detail and provide equivalent environmental protection ( <i>Note: Inspector should document if the environmental equivalence is implemented in the field.</i> )	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Describe each deviation and reasons for nonconformance:			
112.7(a)(3) Plan includes diagram with location and contents of all regulated containers (including completely buried tanks otherwise exempt from the SPCC requirements), transfer stations, and connecting pipes		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.7(a)(3) Plan addresses each of the following:			
(i) For each container, type of oil and storage capacity (see Appendix A)		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(ii) Discharge prevention measures, including procedures for routine handling of products		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(iii) Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(iv) Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources)		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(v) Methods of disposal of recovered materials in accordance with applicable legal requirements		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
(vi) Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors contracted to respond to a discharge, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b)		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
Comments:			

INDICATE IF ITEM IS ADDRESSED ADEQUATELY (Yes), INADEQUATELY (No), OR IS NOT APPLICABLE (NA) IN PLAN AND FIELD.

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
112.7(a)(4)	Plan includes information and procedures that enable a person reporting a discharge as described in §112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge; the type of material discharged; estimates of the total quantity discharged; estimates of the quantity discharged as described in §112.1(b); the source of the discharge; a description of all affected media; the cause of the discharge; any damages or injuries caused by the discharge; actions being used to stop, remove, and mitigate the effects of the discharge; whether an evacuation may be needed; and the names of individuals and/or organizations who have also been contacted	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
112.7(a)(5)	Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
112.7(b)	Plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
112.7(c)	Appropriate containment and/or diversionary structures provided to prevent a discharge as described in §112.1(b) before cleanup occurs. The entire containment system, including walls and floors, is capable of containing oil and is constructed to prevent escape of a discharge from the containment system before a cleanup occurs. ... (2) <b>For offshore facilities:</b> (i) curbing or drip pans, or (ii) sumps and collection systems (See Appendix A)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.7(d)	Determination(s) of impracticability of secondary containment	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	If <b>YES</b> , is the impracticability of secondary containment clearly demonstrated?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	Comments concerning impracticability determination(s) for secondary containment:		
	If impracticability determination is made, for bulk storage containers, periodic integrity testing of containers and leak testing of the valves and piping associated with the container is conducted	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	If impracticability determination is made: (1) Contingency Plan following 40 CFR part 109 (see Appendix C) is provided <b>AND</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
(2) Written commitment of manpower, equipment, and materials required to control and remove any quantity of oil discharged that may be harmful	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
112.7(e)	Inspections and tests conducted in accordance with written procedures	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
	Record of inspections or tests signed by supervisor or inspector and kept with Plan for at least 3 years (see Appendix B checklist)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Comments:			

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
112.7(f) Personnel, training, and oil discharge prevention procedures			
(1)	Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules and regulations; general facility operations; and contents of SPCC Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(2)	Person designated as accountable for discharge prevention at the facility	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(3)	Discharge prevention briefings conducted at least once a year for oil handling personnel	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.7(h) Tank car and tank truck loading/unloading rack*			
(1)	Does loading/unloading area (the location adjacent to the <b>loading or unloading rack</b> ) drainage flow to catchment basin or treatment facility? <input type="checkbox"/> Yes <input type="checkbox"/> No <ul style="list-style-type: none"> <li>• If NO, quick drainage system used</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	Containment system holds capacity of the largest single compartment of a tank car/truck loaded/unloaded at the facility	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(2)	Physical barriers, warning signs, wheel chocks, or vehicle brake interlock system in loading/unloading areas (the location adjacent to the <b>loading or unloading rack</b> ) to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(3)	Lower-most drains and all outlets on tank cars/trucks inspected prior to filling/departure, and if necessary ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.7(i) Brittle fracture evaluation of field-constructed aboveground containers			
112.7(i)	Brittle fracture evaluation is conducted after tank repair/alteration/change in service that might affect the risk of a discharge or after a discharge/failure due to brittle fracture or other catastrophe, and appropriate action taken as necessary (for field-constructed aboveground containers)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.7(j) State rules, regulations and guidelines and conformance with applicable sections of 40 CFR part 112			
112.7(j)	Discussion of conformance with applicable more stringent State rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR part 112	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
Comments:			
<p>* Note that a tank car/truck loading/unloading rack must be present for §112.7(h) to apply. Though this requirement applies to all facilities, loading and unloading rack equipment is often not present at typical offshore production facilities.</p>			

INDICATE IF ITEM IS ADDRESSED ADEQUATELY (Yes), INADEQUATELY (No), OR IS NOT APPLICABLE (NA) IN PLAN AND FIELD.

OFFSHORE OIL DRILLING, PRODUCTION, OR WORKOVER FACILITIES—112.11		PLAN	FIELD
112.11(b)	Oil drainage collection equipment used to prevent and control small discharges around pumps, glands, valves, flanges, expansion joints, hoses, drain lines, separators, treaters, tanks, and associated equipment	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	Facility drains are controlled and directed toward a central collection sump to prevent a discharge as described in §112.1(b); if drains and sumps not practicable, oil in collection equipment removed as often as necessary to prevent overflow	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.11(c)	For facilities using a sump system, sump and drains adequately sized	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	For facilities using a sump system, spare pump available to remove liquids and assure that oil does not escape	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	Regularly scheduled preventive maintenance inspection and testing program to assure reliable operation of liquid removal system and pump start-up device	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	Redundant automatic sump pumps and control devices are installed if necessary	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.11(d)	If separators and treaters are equipped with dump valves which predominantly fail in the closed position and where pollution risk is high, facility equipped to prevent discharges by (1) extending the flare line to a diked area if the separator is near shore, (2) equipping separator with high liquid level sensor to automatically shut in wells producing to the separator, OR (3) installing parallel redundant dump valves	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.11(e)	Atmospheric storage or surge containers equipped with high liquid level sensing devices that activate an alarm or control the flow, or otherwise prevent discharges	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Comments:			



INDICATE IF ITEM IS ADDRESSED ADEQUATELY (Yes), INADEQUATELY (No), OR IS NOT APPLICABLE (NA) IN PLAN AND FIELD.

OFFSHORE OIL DRILLING, PRODUCTION, OR WORKOVER FACILITIES—112.11		PLAN	FIELD
112.11(f)	Pressure containers equipped with high and low pressure sensing devices that activate an alarm or control the flow	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.11(g)	Containers equipped with suitable corrosion protection	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.11(h)	Written procedures maintained in the SPCC plan for inspecting and testing pollution prevention equipment and systems	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
112.11(i)	Testing and inspection of pollution prevention equipment and systems conducted on a scheduled periodic basis commensurate with the complexity, conditions, and circumstances of the facility and any other applicable regulations. Simulated discharges are used for testing and inspecting human and equipment pollution control and countermeasure systems	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.11(j)	Detailed records are provided that describe surface and subsurface well shut-in valves and devices in use at the facility for each well. Records are sufficient to determine the method of activation or control, such as pressure differential, change in fluid or flow conditions, combination of pressure and flow, or manual or remote control mechanisms	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
112.11(k)	Blowout prevention (BOP) assembly and well control system installed before drilling below any casing string and during workover operations	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	BOP assembly and well control system capable of controlling any well-head pressure that may be encountered while on the well	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.11(l)	Manifolds (headers) equipped with check valves on individual flowlines	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.11(m)	If the shut-in well pressure is greater than the working pressure of the flowline and manifold valves up to and including the header valves, flowlines are equipped with a high pressure sensing device and shut-in valve at the wellhead, <b>OR</b> pressure relief system provided for flowlines	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.11(n)	Piping appurtenant to the facility is protected from corrosion, such as with protective coatings or cathodic protection	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.11(o)	Sub-marine piping appurtenant to the facility is protected against environmental stresses and other activities such as fishing operations	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.11(p)	Sub-marine piping maintained in good operating condition at all times. Piping periodically inspected or tested on a regular schedule for failures. Documentation of inspections or tests kept at facility.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Comments:			





## SPCC FIELD INSPECTION AND PLAN REVIEW TABLE

### Appendix A: Documentation of Field Observations for Containers and Associated Requirements

Inspectors should use this table to document observations of containers, as needed.

**Containers**

**Check containers for the following:** (1) atmospheric storage or surge containers are equipped with high liquid level sensing devices that activate an alarm or control the flow, or otherwise prevent discharges (2) pressure containers are equipped with high and low pressure sensing devices that activate an alarm or control the flow (3) containers are equipped with suitable corrosion protection.

**Check piping for:** droplets of stored material, discoloration, corrosion, bowing of pipe between supports, evidence of stored material seepage from valves or seals, and localized dead vegetation.

**Secondary Containment**

**Check secondary containment for:** containment system (including walls and floor) ability to contain oil such that oil will not escape the containment system before cleanup occurs, cracks, discoloration, presence of spilled or leaked material (standing liquid), corrosion, and valve conditions.

Container ID/General Condition	Storage Capacity and Type of Oil	Type of Containment/ Drainage Control	Overfill Protection and Testing & Inspections

# SPCC INSPECTION AND TESTING CHECKLIST

## Appendix B: Required Documentation of Tests and Inspections

Records of inspections and tests required by 40 CFR part 112 signed by the appropriate supervisor or inspector must be kept with the SPCC Plan for a period of three years. Records of inspections and tests conducted under usual and customary business practices will suffice. Documentation of the following inspections and tests should be kept with the SPCC Plan.

Inspection or Test	Documentation		Not Applicable
	Present	Not Present	
112.7–General SPCC Requirements			
(d) Integrity testing is conducted for bulk storage containers with no secondary containment system and for which an impracticability determination has been made			
(d) Integrity and leak testing of valves and piping associated with bulk storage containers with no secondary containment system and for which an impracticability determination has been made			
(i) Evaluate field-constructed aboveground containers for potential for brittle fracture or other catastrophic failure when the container undergoes a repair, alteration, reconstruction or change in service			
112.11–Offshore oil drilling, production and workover facilities			
(c) Regularly scheduled preventive maintenance inspection and testing program to assure reliable operation of liquid removal system and pump start-up device			
(i) Testing and inspection of pollution prevention equipment and systems performed on a scheduled periodic basis. Simulated discharges are used for testing and inspecting human and equipment pollution control and countermeasure systems			
(p) Submarine piping periodically inspected or tested for failures.			
Comments:			

## SPCC CONTINGENCY PLAN REVIEW CHECKLIST

### Appendix C: 40 CFR Part 109—Criteria for State, Local and Regional Oil Removal Contingency Plans

If a facility makes an impracticability determination for secondary containment in accordance with §112.7(d), it is required to provide an oil spill contingency plan following 40 CFR part 109.

<b>109.5—Development and implementation criteria for State, local and regional oil removal contingency plans*</b>	<b>Yes</b>	<b>No</b>
(a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.		
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:		
(1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges.		
(2) A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.		
(3) Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., NCP).		
(4) An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.		
(c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:		
(1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.		
(2) An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated.		
(3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.		
(d) Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including:		
(1) Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.		
(2) Predesignation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.		
(3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.		
(4) Provisions for varying degrees of response effort depending on the severity of the oil discharge.		
(5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.		
(e) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.		

\* The contingency plan should be consistent with all applicable state and local plans, Area Contingency Plans, and the National Contingency Plan (NCP).