

DEVELOPING A SPILL PREVENTION RESPONSE PLAN

The Storage Tank and Spill Prevention Act (Act 32 of 1989 as amended) requires owners of aboveground storage tank facilities with a total aboveground capacity greater than 21,000 gallons of regulated substances to develop and submit a Spill Prevention Response (SPR) Plan to the Pennsylvania Department of Environmental Protection (DEP). Regulated substances include petroleum products and hazardous substances.

The initial deadline for owners of existing facilities to submit SPR Plans was August 4, 1990. The purpose of the SPR Plan is to minimize and abate the threat to public health and the environment from releases of regulated substances.

The Storage Tank Program is administered by DEP's Bureau of Environmental Cleanup and Brownfields, Division of Storage Tanks, P.O. Box 8762, Harrisburg, PA 17105-8762, 800-42-TANKS (in PA) or 717-772-5599, or through the PA AT&T Relay Service at 800-654-5984 (Telecommunication Devices for the Deaf).

What is a Spill Prevention Response Plan?

An SPR Plan describes the procedures that have been developed for an aboveground storage tank facility for:

- Preventing a spill or release;
- Containing and controlling contamination in the event of an accidental release;
- Notifying all municipalities and predetermined water users within 20 downstream miles that might be affected by a release; and
- Notifying DEP and local emergency management agencies.

How do facility owners develop an SPR Plan?

In general, any manufacturing or commercial facility that has the potential for accidental releases already should have developed a Preparedness, Prevention, and Contingency (PPC) Plan. The only difference between the PPC and the SPR plans is the addition of the downstream notification list to the SPR Plan. Storage tank facilities that already have an updated PPC Plan only need to include the notification list. DEP strongly recommends that facilities consolidate both plans into a single document and keep it up to date.

To assist with the development of a PPC or an SPR Plan, DEP has guidelines (**Technical Guidance 400-2200-001, Guidelines for the Development and Implementation of Environmental Emergency Response Plans**) that describe the general format and explain what is needed in the plan. The SPR Plan does not need to be long and complex to be effective. Often, simplicity is essential to a good plan.

Like the PPC Plan, the SPR Plan must be developed for a specific facility and in accordance with good engineering practices by an employee who is familiar with the day-to-day operations of the facility. If a consultant is employed, that consultant must be authorized to thoroughly study the facility's procedures for storing, handling, using, and disposing of the regulated substances.

The SPR Plan must include the following elements:

- A detailed description of the facility including a 7½ minute USGS topographical map or facsimile showing the tank facility;
- An organizational strategy for plan implementation;
- Facility programs related to spill prevention and response countermeasures; and
- The network of emergency response agencies and downstream notifications.

What is downstream notification?

In the event of a release, downstream notification requires the facility to notify all surface water users and municipal and county officials within 20 downstream miles. The facility is responsible for developing the notification list in cooperation with the county emergency management agency. Downstream water users include all municipal water users, water companies, and industrial users.

Each year, the facility must send all downstream surface water users and municipal and county officials a written notice that includes:

- An inventory of the regulated substances stored;
- A summary of any spills and releases that occurred in the previous year, including the cleanup efforts; and
- Measures implemented to prevent future releases.

The notification list must be updated annually to identify any changes in names, addresses, and telephone numbers of downstream contacts. This update must be done in cooperation with county emergency management agencies.

Must facilities update an SPR Plan?

Periodically, a facility must review its SPR Plan to determine if it should be updated. If the plan needs to be updated, the facility owner must submit a revised plan or addendum to the appropriate DEP regional office. Although there is no requirement that a facility update its plan on any given schedule, DEP can, at any time, request an updated plan.

In addition to complying with DEP’s request for an updated SPR plan, the following are other factors requiring updates:

- Modification of design, construction, operation, or maintenance of the tank or tank facility or associated equipment or other circumstances that increase the potential for fires, explosions, or releases of regulated substances;
- Modification of emergency equipment;
- Changes in facility emergency organization;
- Revisions to applicable department regulations;
- Failure of the plan in an emergency; or
- Removal or addition of any aboveground storage tank(s).

When is the SPR Plan implemented?

If a release occurs, the facility must implement the SPR Plan immediately to control and contain contamination and to notify all downstream and emergency contacts. The facility is responsible for quickly directing its resources to the problem area(s) and to obtain additional resources as needed to implement the SPR Plan.

For additional information, contact the Division of Storage Tanks or your regional DEP office:	
<p>Southeast Region 2 East Main St. Norristown, PA 19401-4915 484-250-5900 Counties: Bucks, Chester, Delaware, Montgomery, and Philadelphia</p>	<p>Northeast Region 2 Public Square Wilkes-Barre, PA 18701-1915 570-826-2511 Counties: Carbon, Lackawanna, Lehigh, Luzerne, Monroe, Northampton, Pike, Schuylkill, Susquehanna, Wayne, and Wyoming</p>
<p>Southcentral Region 909 Elmerton Ave. Harrisburg, PA 17110-8200 717-705-4705 Counties: Adams, Bedford, Berks, Blair, Cumberland, Dauphin, Franklin, Fulton, Huntingdon, Juniata, Lancaster, Lebanon, Mifflin, Perry, and York</p>	<p>Northcentral Region 208 W. Third St., Suite 101 Williamsport, PA 17701-6448 570-327-3636 Counties: Bradford, Cameron, Clearfield, Centre, Clinton, Columbia, Lycoming, Montour, Northumberland, Potter, Snyder, Sullivan, Tioga, and Union</p>
<p>Southwest Region 400 Waterfront Drive Pittsburgh, PA 15222-4745 412-442-4000 Counties: Allegheny, Beaver, Cambria, Fayette, Greene, Somerset, Washington, and Westmoreland</p>	<p>Northwest Region 230 Chestnut St. Meadville, PA 16335-3481 814-332-6648 Counties: Armstrong, Butler, Clarion, Crawford, Elk, Erie, Forest, Indiana, Jefferson, Lawrence, McKean, Mercer, Venango, and Warren</p>

For more information, visit www.dep.pa.gov, Businesses > Land > Storage Tanks.