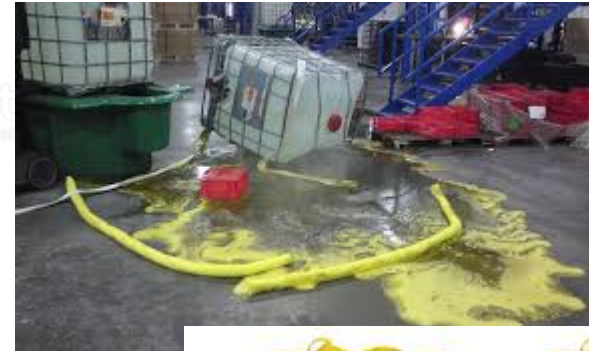


SPILLS

-Keep the Egg off your Face-

Spring, 2020



Spills - What Will We Discuss Today?

1. Review some federal and state regulations on Spill Reporting.
2. Review applicable requirements for spill reporting in the State of Mississippi.
3. Review three spills and how reporting may be handled, or mishandled.

Spill Reporting – Federal Spill Regulations

40 CFR Part 112 (SPCC)

Spill Prevention, Control, and Counter Measures Plan

1. 1,320 gallons AST or >
2. 42,000 gallons bunker or >
3. Count only Oil in 55-gallon containers or >
4. Sheen Rule in Navigable Waters
5. Spill > 1,000 gallons or 42 gallons in same year
6. Exempt from CERCLA RQ's

Spill Reporting – State Spill Regulations

Baseline Stormwater General Permit for Industrial Activities Stormwater Pollution Prevention Plan (SWPPP)

1. Based on SIC Codes
2. Focused on Waters of the State
3. Not exempt from CERCLA RQs
4. Not based on any certain quantity

Others: NPDES/CERCLA/EPCRA/CAA/CWA/TSCA/RCRA

Spill Reporting – State Reporting Law

MS State Legal Requirement

1. All Spills of Any Quantity Need to be Reported.
2. MS Code Section 49-17-29 (2) (a). It is unlawful for any person to cause pollution of any waters of the state or to place or cause to be placed any wastes in a location where they are likely to cause pollution of any waters of the state.
3. Self Reporting can save a company time, money, and possibly incarceration.
4. UST – 25 gallons or more must be reported (ARAR?).

Spill Reporting – 3 Spill Examples in MS

1. Crude Oil Pipeline Release

- Large Release into Major River System.
- Coordinated Emergency Response.
- Long Term Monitoring and Cleanup.
- Root Cause: Corrosion in the U.S. Pipeline Infrastructure.

Spill Reporting – State Regulations

2. Industrial Wastewater Release

- Moderate Release onto Facility Property.
- Coordinated Facility Emergency Response.
- Short Term Monitoring and Cleanup.
- Root Cause: PLC operating Switchover Valves for Batch Tanks Malfunctioned.

Spill Reporting – State Regulations

3. AvGas Fuel Farm Release

- Small Release onto Facility Property.
- Prolonged Facility Emergency Response.
- Short Term Monitoring and Cleanup.
- Root Cause: Lack of Inspection during Fueling Operations.

Spill Reporting – State Regulations

AvGas Fuel Farm Procedures.

- **Procedure 1:** Any release of less than 25 gallons of oil or a spill of a hazardous substance that is less than its published RQ or does not have a published RQ (e.g., Propylene Glycol), that is contained and cleaned up in less than 24 hours, and does not leave airport property: **DAR and ERC**
- **Procedure 2:** Any release of less than 25 gallons of oil or a spill of a hazardous substance that is less than its published RQ or does not have a published RQ (e.g., Propylene Glycol), that is not contained and cleaned up within 24 hours, or leaves airport property potentially impacting the State of MS Water Quality Standards, must be reported immediately: **DAR, MEMA (CEMA, MDEQ, MDOT), ERC, FIRE**
- **Procedure 3:** Any release that exceeds 25 gallons of oil must be reported within 24 hours of discovery: **DAR, MEMA (CEMA, MDEQ, MDOT), ERC, FIRE**

Spill Reporting – State Regulations

AvGas Fuel Farm Release Procedures (Continued)

- **Procedure 4:** A single discharge of any hazardous substance that results in a release to the environment that equals or exceeds its reportable quantity under CERCLA (40 CFR Part 302) must be reported immediately: *(Not Applicable – As current significant chemicals listed in the SPCC and SWPPP (12/2019) are exempt from CERCLA RQ's or do not have published RQs):* DAR, MEMA (CEMA, MDEQ, MDOT), ERC, FIRE, NRC, EPA (Region 4)
- **Procedure 5:** A discharge of oil in any amount which creates a sheen, emulsion, or sludge that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately: DAR, MEMA (CEMA, MDEQ, MDOT), ERC, FIRE, NRC, EPA (Region 4)
- **Procedure 6:** In addition to selecting one of the spill reporting procedures to implement above (Procedures 1-5), if a single discharge of oil exceeding 1,000 gallons or 2 discharges each exceeding 42 gallons within a 12-month period that affects or threatens to affect navigable waters or adjoining shorelines: DAR, MEMA (CEMA, MDEQ, MDOT), EPA (Region 4)

Spill Reporting – State Regulations

Resources:

1. EPA List of Lists
2. Regional Inspectors Guide to SPCC Plans
3. Many Others

Spill Reporting – State Regulations



**Mississippi Department of
Environmental Quality**



Thank You!

ANY QUESTIONS OR COMMENTS?

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SAFETY  **MATTERS**