

DAAAlert...on Solid Waste Issues



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Landfill Spill Prevention Requirements

It has come to our attention that the US EPA is currently reviewing and enforcing the provisions of 40 CFR Part 112 – Oil Pollution Prevention at some municipal landfills in Virginia. The regulation requires facilities that store petroleum products in excess of 660 gallons in a single above ground storage tank, or more than 1,320 gallons in a combination of above ground vessels, tanks, and containers, develop a Spill Prevention Control and Countermeasure (SPCC) Plan for the facility. The table below outlines the basic applicability criteria and program requirements of the regulation.

Regulatory Program	Applicability Criteria	Program Requirements
Spill Prevention Control and Countermeasure (SPCC) Plans - 40 CFR Part 112 - Oil Pollution Prevention	Facility with the following petroleum storage: <ul style="list-style-type: none">· 660 gallons in single AST;· 1320 gallons combined; or· 42,000 gallons in USTs If any of the above criteria are met all tanks at the facility are covered.	<ul style="list-style-type: none">· Development of written SPCC Plan certified by a professional engineer.· Document potential spill scenarios.· Document adequate secondary containment, diversionary structures, and/or contingency plan.· Document facility construction methods/management practices.· Document routine inspection, testing and training programs.· Document reporting procedures.

If your landfill facility, vehicle maintenance area, or recycling facility has a fueling facility or stores petroleum products in excess of these threshold quantities, you may require an SPCC Plan. Additionally, the SPCC plan must be reviewed and certified by a professional engineer every 3 years.

Each year the US EPA identifies specific programs of regulatory emphasis. Last year Higher Education Facilities came under their scrutiny and several Virginia colleges were fined in amounts greater than \$30,000 for their lack of compliance with these regulations.

If you have any questions about this program, or if you would like an assessment of your compliance with these regulations, please contact Andy Kassoff, P.G. at (540) 552-0444 (akassoff@daa.com) in our Blacksburg office or Steve Werner, P.G. at (804) 264-2228 (swerner@daa.com) in our Richmond office, or Jeff Crate, P.G. in either location (jcrate@daa.com).

Draper Aden Associates is a full-service engineering and environmental consulting firm. Our services include: civil/utilities engineering; environmental services, geological/hydrogeological services; geotechnical/construction/laboratory; site planning & development; solid waste management; surveying; subsurface utility engineering; information management services, GIS and design/build/operate solutions.



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