

SPCC Regulations & Electrical Equipment

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Electrical Equipment

- ◆ 2002 Amendments amended §112.1(b), which describes activities triggering SPCC regulation, by adding “using” before phrase “oil and oil products” (67 Fed. Reg. at 47054, 47060, 47140).
- ◆ Oil-filled electrical equipment is now subject to EPA’s SPCC jurisdiction. Potentially applicable to 50,000+ electrical substations and approximately 50,000 transformers at customer locations.

Electrical Equipment

- ◆ Electric Equipment is specifically excluded from definition of “bulk storage container.” §112.2; see 67 Fed. Reg. at 47054-55, 47072.
- ◆ Equipment therefore *not* subject to §112.8(c) bulk storage requirements:
 - bulk storage size containment
 - corrosion protection
 - periodic integrity testing
 - inspection requirements

Electrical Equipment & Secondary Containment

- ◆ General containment (§ 112.7(c), (d)) is required for facilities that use oil-filled electrical equipment “whenever practicable” (67 Fed. Reg. at 47116).
- ◆ EPA acknowledges “some or perhaps all types of secondary containment” for electrical equipment “may be contrary to safety factors or other good engineering practice considerations” (67 Fed. Reg. at 47102).

Multi-facility SPCC Plans

- ◆ Multi-facility plan is specifically mentioned as an option “for electrical utility transmission systems, electrical cable systems, and similar facilities which might aggregate equipment located in diverse areas into one plan.”
67 Fed. Reg. at 47080

Plan Formatting

- ◆ Multi-facility/system-wide plans provide broad discretion in meeting SPCC requirements.
- ◆ System-wide plan (*e.g.*, generic spill and contingency plan) with site-specific information drawn from existing databases, supplemented with topographical information, might meet the SPCC plan requirements.

Electrical Equipment – A Need to Tailor the Regs

- ◆ Basis for Tailoring Regulations for Electrical Equipment:
 - Electrical Equipment Fundamentally Different from Oil Tanks (see 67 Fed. Reg. at 47072)
 - Rapid Response = Containment
 - Excellent Spill History (<1%)

Tailored SPCC Program for Electrical Equipment

◆ Proposed Approach - 3 Tiers

- Separate section in Subpart B of Part 112 for oil-filled electrical equipment.
- No aggregation of electrical equipment/raising of volume threshold from 55 ⇒ 1320 gallons).
- “Qualified equipment” - Part 109 Contingency Plans for equipment ranging from 1320 – 20,000 gallons that is monitored & 10-year record of no discharges.
- Full SPCC Plans for “non-qualified” equipment (>20,000 gallons/those with discharges).

Tailored SPCC Program for Electrical Equipment

◆ Benefits

- Significant Cost Savings
 - ◆ Fewer Formal SPCC Plans Prepared
 - ◆ Avoids Secondary Containment Retrofit
 - ◆ Relief for Small Facilities
- Contingency Plans and Rapid Response Capability Achieve Goal of Preventing Discharge.