



the Phoenix navigator

NEWS YOU CAN USE ABOUT TANKS, ENCLOSURES, PACKAGING AND FUEL MANAGEMENT SYSTEMS

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More Proposed Rules for SPCC Plans

As the 2009 deadline to transition away from the 1974 Spill Prevention Controls & Countermeasures (SPCC) rule to the 2002 SPCC rule fast approaches, additional changes, as promised by the EPA were proposed last October. With these, the agency intends to provide clarity, tailor and streamline requirements as appropriate to encourage greater compliance with SPCC regulations. Already there have been four significant changes to the rules, finalized in December 2006, that affect many SPCC plans. The October proposals were more wide-ranging than the December 2006 final rules, with the potential for even greater impact.

October 2007 Proposed Rules

Any facility storing above 1,320 gallons of regulated oil and near enough to a navigable waterway or shoreline that could reasonably expect an impact by a discharge of oil from the facility requires a SPCC plan. Facilities storing above 42,000 gallons of regulated oil in underground storage tanks that are exempt from the 1988 UST regulations also require a SPCC Plan. The proposed rules would potentially affect all SPCC-regulated facilities. Changes include:

- Clarity on the general secondary containment requirements.
- Flexibility in security requirements.

- Flexibility in use of industry standards to comply with integrity testing requirements.
- Additional flexibility in meeting the facility diagram requirements.
- Clarification on the flexibility provided by the definition of "facility."
- Define "loading/unloading rack" to clarify equipment subject to provisions for facility tank car and tank truck loading/unloading racks and exclude farms and oil production facilities from the loading/unloading requirements.

These items have been issues for facilities since the final rule was published in 2002. EPA is now providing the additional information to help explain the requirements.

Another major change allows the use of a SPCC-like plan for facilities with no single bulk storage oil container with a capacity greater than 5,000 gallons, and the facility has no more than 10,000 gallons of aggregate oil storage capacity. Currently, facilities with aggregate storage no greater than 10,000 gallons can self-certify a SPCC plan in lieu of review and certification by a Professional Engineer.

Conclusion

All SPCC plans must be updated to the 2002 final rules before July 1, 2009. With these proposed rules being considered and the fact they most likely won't

go final until late 2008, facilities will have a very short time frame to update their final plans.



Cold Weather Fuel Issues

Cold No. 2 diesel, if not warmed on the way to the fuel filter, can wax and plug the filter, thus starving the engine and resulting in a shutdown or at least a power loss. If your emergency power fuel tank is exposed to temperatures of 15°F or below, be sure your fuel supplier is providing a fuel additive or that the fuel provided has been blended for cold weather. On-road diesel fuel that is consumed on a regular basis has likely been properly blended for the weather conditions. But off-road diesel, that may be stored for many months in an emergency power system, may be the wrong seasonal blend. For example, if your standby power fuel tank was filled in July, that fuel, without additives, may not be suitable for winter weather conditions.

FUEL QUALITY ASSURANCE

NATIONAL FIRE PROTECTION ASSOCIATION STANDARDS - NFPA 110: Standard for Emergency and Standby Power Systems, 2005 edition:

Chapter 7.9.1.2 states that "Fuel system design shall provide for a supply of clean fuel to the prime mover".

Chapter 7.9.1.3 states that "Tanks shall be sized so that the fuel is consumed within the storage life or provision shall be made to replace stale fuel with clean fuel".

Annex A states that "Commercial distillate fuel oils used in modern diesel engines are subject to various detrimental effects. The origin of the crude oil, refinement processing techniques, time of year, and geographical consumption location all aid in the determination of fuel blend formulas. Sulfur, naturally occurring gums, waxes, soluble metallic soaps, water, dirt, and temperature all begin to degrade fuel as it is handled and stored. These

effects begin at the time of fuel refinement and continue until consumption".

"Scheduled fuel maintenance and testing help to reduce or nearly eliminate fuel contamination. Fuel maintenance filtration can remove contaminants and water and return fuel to conditions where it will provide reliability and efficiency for standby generators when called upon in emergency conditions. Fuel maintenance and testing should begin the day of installation and first fill to establish a benchmark guideline for further comparison."



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