

From: Witul.Janice@epamail.epa.gov
Cc: vhayer@co.merced.ca.us; dthrasher@co.merced.ca.us; casey@ccgga.org; slowe@co.merced.ca.us; jmartens@tularehhsa.org; Amanda.Carvajal; pstevever@tulcofb.org; Reich.Peter@epamail.epa.gov
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Attachments: [spccfarms.pdf](#)

A lot of valuable information was presented Tuesday at the Merced and Tulare County Farm Bureaus, concerning programs which sometimes overlap (and possibly conflict) with each other.

Just to clarify some points from the federal Oil Program perspective:

US EPA's SPCC program does not require HazWOP training/certification for all persons handling oil. There may be special training/ certification requirements for certain employees under OSHA regulations or by other regulatory agencies.

Concerning pesticides - 40 CFR 112.1 exempts all pesticide application equipment and related mix containers.

Fencing and lighting - The SPCC security requirements may be found at 40 CFR 112.7(g). The fencing requirement was removed several years ago; and lighting requirements are now that the SPCC Plan must *address the appropriateness of security lighting to prevent acts of vandalism and assist in the discovery of oil discharges.*

Containers under 55 gallon capacity - SPCC requirements do not apply to any container with a storage capacity of less than 55 gallons of oil, per 40 CFR 112.1(d)(5). [They are not considered in the calculation of the regulatory threshold, and it is not required that they be accounted for in any manner if a facility is determined to be subject to SPCC requirements due to other quantities of oil.]

Please keep in mind that the November 10, 2011 compliance date relates to farms that started operations after August 16, 2002. If a farm was in operation on or before August 16, 2002, and does not already have a written and implemented Plan, that facility is not in compliance with SPCC regulations and must prepare a Plan as soon as possible. Such facilities are required to maintain their SPCC program and amend their Plan by the November 10, 2011 compliance date.

The attached fact sheet and SPCC website may be helpful.

<http://www.epa.gov/emergencies/content/spcc/index.htm>

Janice L. Witul SFD-9-4
U.S. EPA - Region IX
75 Hawthorne Street
San Francisco CA 94105

Phone: 415.972.3089
Fax: 415.947.3518
e-mail: witul.janice@epa.gov