



Interoffice Communication

Environment, Safety, Health & Assurance

G40 TASF

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July 13, 2012

To: Shawn Nelson
Topical Appraisal File 2012

From: Dan Kayser

Subject: **Topical Appraisal Report 2012, Spill Prevention, Control, and Countermeasures (SPCC) Training**

The scope of the Spill Prevention, Control, and Countermeasures (SPCC) Training topical appraisal is to review the regulatory requirements for SPCC training and the existing training to verify that the training is meeting regulatory requirements.

TOPICAL APPRAISAL REPORT

Spill Prevention, Control, and Countermeasure (SPCC) Training

June 30, 2012

Dan Kayser,
Environmental Specialist

1.0 Scope:

The scope of the Spill Prevention, Control, and Countermeasures (SPCC) Training topical appraisal is to review the regulatory requirements for SPCC training and the existing training to verify that the training is meeting regulatory requirements.

2.0 Dates:

This review was conducted June 2012.

3.0 Methodology:

The methodology used to conduct the topical appraisal included the following:

1. Review SPCC regulations (40 CFR Part 112)
2. Review Training Program (AL-218)
3. Review training records

3.1 References:

The following references were consulted for informational purposes and / or to ensure that the current program was in compliance:

- 40 CFR Part 112
- Spill Prevention, Control & Countermeasure (SPCC) Plan, 10200.037
- Training Needs Questionnaire (Form 48202.006)
- Training records (AL-218)

3.2 Program Documentation:

Spill Prevention, Control & Countermeasure (SPCC) Plan, 10200.037
Training Records

3.3 Training:

Facilities Services personnel and key research personnel are trained (AL-218) to inspect and prevent discharges per applicable rules and regulations of the SPCC according to 40 CFR part 112.7(f) as they pertain to the Ames Laboratory. As of Jun 25, 2012, 27 people have taken training AL-218.

3.4 Personnel Interviewed:

Terry Herrman and Hal Salisbury were interviewed. Both Terry and Hal are responsible for conducting inspections for their Groups. Neither had any suggestions for improving the SPCC program.

4.0 Assessment Results & Discussion

The Training Needs Questionnaire has the following question for targeting individuals that may need to take SPCC training.

“Will you work with equipment containing 55 gallons or more of an oil based product and/or will you store containers containing 55 gallons or more of an oil based product?”

The readiness review is another safety net for reviewing activities and the need for SPCC training. The ES&H hazard Identification Checklist, 10200.003, rev 22 has a check off under Environmental Concerns. D.1. which states “Potential to release hazardous, radioactive

materials or oil products (including oil filled equipment/containers with a capacity \geq 55 gallons) to the sanitary or storm sewers, soil.”

A review of SPCC training shows that personnel are identified as needing SPCC training and are indeed completing the training.

A review of the Laboratory’s SPCC Plan, 10200.037, is current and up to date. Section 9.12 of the Plan covers training and inspections. Section 9.1 covers training records.

4.1 Strengths:

The Laboratory has not experienced any major spills (>5 gallons) of petroleum based materials. This can be attributed to training, procedures and proactive planning.

4.2 Noteworthy Practices:

4.3 Findings:

Level 1 Findings: None

Level 2 Findings: None

Level 3 Findings: None

5.0 Overall Conclusions:

SPCC training is sufficient and is being tracked appropriately by the Training Office. All key personnel are current on SPCC training.

6.0 Attachments: None