



APR 2000

Region III Oil Program Activities

Volume 7, Issue 3

WHO'S WHO FEDERAL AGENCY ROLES AND RESPONSIBILITIES FOR OIL SPILL PREVENTION AND RESPONSE

The Clean Water Act of 1972 as amended (CWA) is the principle federal statute for protecting navigable waters and adjoining shorelines from pollution. The National Oil and Hazardous Substance Pollution Contingency Plan (NCP), issued under the CWA as amended and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund), is the linchpin of the national response planning system, and is the federal government's blueprint for responding to oil spills and hazardous substance releases.

◆ EPA

EPA Regulates non-transportation related onshore facilities through E.O. 12777 (and certain offshore facilities through the Federal Oil Pollution Prevention regulation). Within EPA, the Office of Solid Waste and Emergency Response (OSWER) is responsible for developing EPA's national oil spill program policy including developing regulations and guidance for implementing the Oil Pollution Prevention regulation. Teams in the 10 EPA regional offices form the "front line" of EPA's Oil Spill Program by responding to inland oil spills and inspecting facilities to determine compliance with the Oil Pollution Prevention regulation.

Other EPA offices handle various aspects of oil pollution prevention, mitigation, response compliance and enforcement. For example, within OSWER, the Office of Underground Storage Tanks (UST) implements a Prevention program for petroleum USTs, and the Chemical Emergency Preparedness and Prevention Office participates in local emergency planning activities including planning for oil spill response. Outside of OSWER, the Office of Enforcement and Compliance Assurance handles enforcement and compliance issues for oil spill prevention and response.

EPA provides On Scene Coordinators (OSCs) for inland spill response, and must direct the response in cases where the inland spill "is of such a size or character as to pose a substantial threat to the public health or welfare." EPA may also take the lead in managing the response if state or local response officials so request.

◆ DOT

The Research and Special Programs Administration's (RSPA) Office of Pipeline Safety, regulates the petroleum product transportation in pipelines, tank trucks, and railroad cars to assure the safe transportation of natural gas, petroleum, and other hazardous materials. RSPA develops regulations and alternative approaches for design, construction, testing, operation, maintenance, and emergency response to manage risks at pipeline facilities.

The USCG regulates oil vessels, deep water ports, and the marine transfer components of transportation related onshore facilities, including some inland port areas. The USCG provides OSCs for coastal spill response, and must direct the response in cases where the coastal spill "is of such a size or character as to pose a substantial threat to the public health or welfare." The USCG also manages the National Response Center (NRC) and maintains the National Strike Force, a team of specifically trained and equipped personnel to respond to major marine pollution incidents. The USCG serves as the fund manager for the Oil Spill Liability Trust Fund established by the Oil Pollution Act.

◆ DOI

Minerals Management Service (MMS) regulates certain offshore facilities and associated pipelines (except deep water ports) for federal and state waters. On 2/4/94, the DOI MMS redelegated near shore non-transportation related facilities located landward of coastline to EPA and transportation related facilities located landward of the coastline to DOT.

Currently, DOI contributes expertise on natural resource

Karen Melvin, Chief, Removal Enforcement and Oil Section
1650 Arch Street, Philadelphia, PA 19103
Phone: (215) 814-3275

Paula Curtin, Editor, Spill Enforcement Coordinator
303 Methodist Building, Wheeling, WV 26003
Phone: (304) 234-0256

damage assessments and endangered species protection and is responsible for Native American Lands and U.S. Territories.

SPCC ACTIVITIES

STORAGE TANK CORROSION

Leaking storage tanks, whether above or below ground, can pollute the environment, threaten public health, and lead to billions of dollars in direct and indirect costs. One main reason for storage tank failure is corrosion. Fortunately, corrosion prevention technology exists which can protect storage tanks and keep them structurally sound for years to come.

Government and the public understand the extent to which leaking tanks can damage the environment and threaten public health. In order to halt environmental contamination, U.S. federal regulations require those who own or operate underground tanks and the connected piping to have spill, overfill, and corrosion protection mechanisms in place, and many U.S. states have additional tank protection requirements. The owners/operators of tanks who fail to comply with these regulations can be subject to both civil and criminal penalties.

WHY DO STORAGE TANKS CORRODE?

Corrosion is the deterioration of a material, usually a metal, that results from a reaction with its environment. Without implementing appropriate corrosion control measures, storage tanks will deteriorate. Most tanks are made of steel, a material highly susceptible to corrosion. Stray electric currents from nearby structures, high levels of acidity and moisture in the soil and air, and high concentrations of different chemicals in the soil will accelerate corrosion-related damage. Over time, corrosion can weaken the components of a tank, resulting in holes and leakage.

HOW DO WE CONTROL CORROSION IN STORAGE TANKS?

Modern corrosion control combines historically proven methods with state-of-the-art technology to prevent tanks from deteriorating. Common strategies include selecting corrosion-resistant materials and applying protective coatings and linings as a barrier to the environment. Chemicals added to substances being stored can also inhibit the corrosion process inside the tank, and various forms of cathodic protection systems can be used to maintain the integrity of those storage tank components in contact with the soil.

PLANNING AND TRAINING ARE THE KEYS TO SUCCESS

Corrosion control can protect storage tanks, the environment, and the bottom line of owners and operators. It must be an integral part of a storage tank owner/operator's long term planning. Tank owner support of corrosion control is vital, but comprises only half of the solution. Long term planning for corrosion control must include ongoing education and training for persons responsible for operating tank systems. Those individuals must be able to recognize the early signs of corrosion and prevent it effectively.

CONCLUSION

Above and below ground storage tanks can leak hazardous substances into the environment that contaminate our soil and water. Often, corrosion is to blame. However, corrosion is not a mystery - we know how to prevent it and how to control it. Through implementing comprehensive corrosion control for storage tanks, we can protect the environment while saving billions of dollars each year.

The above article contains information as supplied by the National Association of Corrosion Engineers (NACE).

SPCC PLAN CERTIFICATION

The SPCC Plan must be certified by a professional engineer familiar with the provisions of 40 CFR Part 112, must have examined the facility and be a registered professional engineer in at least one state. The engineer need not be registered in the state in which the facility is located. The engineer's name, registration number, and state of registration must be included as part of the SPCC Plan. In addition, the engineer's seal must be affixed to the Plan as part of the certification.

MAILING LIST

If you would like to be added to the mailing list for future issues of this newsletter, or have an address change please call Cordy Stephens at (215) 814-3276, or fax your request to (215) 814-3254

Need Oil Program Information?

Have a question on Spill Prevention, Control and Countermeasures (SPCC) 40 CFR 112.1 or Facility Response Plans (FRP) 40 CFR 112.20? EPA Region III has in place a hotline to answer these and other oil related questions. The hotline is staffed by the very people that will inspect your facility and review your spill plans. The hotline number is (215) 566-3452.

REGION III RRT MEETING

The next RRT meeting will be held May 16-18, 2000, in Cincinnati, OH. The meeting will be a joint session with EPA Regions III, IV and V participating.

For additional information, contact Linda Marzulli at (215) 814-3256.