

SPCC & Secondary Containment Inspection Checklist



For tank batteries and production sites under 40 CFR 112. Walk the pad, tick each line, sign it, file it with the Plan.

Lease / site

Battery / location

Date

Inspected by

Use your Plan's schedule. For most of these inspections the SPCC rule sets no frequency. The engineer who certified your SPCC Plan sets it, using good engineering practice and industry standards (on a self-certified qualified facility, the owner or operator does). The schedule written in the Plan is the one you are held to.

Write it down. Inspections follow written procedures, and the record is signed by the supervisor or inspector and kept with the Plan for three years (112.7(e)). Records kept under usual and customary business practices will do.

1 Containment capacity and freeboard

112.9(c)(2) • 112.8(c)(2)

- ☐ Largest single container identified. Permanently manifolded tanks counted as one container. EPA guidance
- ☐ Containment holds the entire capacity of the largest single container plus freeboard for rain, and the calculation is written into or kept with the Plan. 112.9(c)(2)
- ☐ No standing rainwater taking up the freeboard.
- ☐ No silt, sand or caliche raising the floor.
- ☐ Nothing added inside the berm since the calculation (tank, pump skid, separator, chemical tote) and no tank swapped for a larger one.
- ☐ Walls checked at their lowest point; none pushed down by vehicles; liner corners not slumped.

Check the wall height. Measure the berm inside the walls.

Wall height (ft) = (largest container ft³ + rain ft × berm area ft²) ÷ (berm area ft² - footprint of the other tanks ft²)

1 bbl = 42 gal = 5.615 ft³ · 7.48 gal = 1 ft³ · rain inches ÷ 12 = feet · footprint of a vertical tank = 3.1416 × diameter² ÷ 4. The rule says "sufficient freeboard" and names no storm. EPA considers the 25-year, 24-hour storm the proper standard but did not make it a requirement. 110% of the largest tank is a rule of thumb that may not hold a big storm. Around Midland, NOAA Atlas 14 puts the 25-year, 24-hour rain at about 5.0 inches; look up your own site.

2 Liner, berm and walls

112.7(c) • 112.9(c)(2)

- ☐ Walls and floor will hold oil until cleanup: no cracks, erosion, corrosion or discoloration. 112.7(c)
- ☐ Liner uncut, no tears; no standing oil or leaked material inside the containment.
- ☐ Every pipe through a wall or liner is sealed.
- ☐ Outside the berm: no oil stains, white salt crust on the walls, stained soil or dead vegetation. EPA tells inspectors these can mean oil and produced water flowed through the containment. EPA guidance
- ☐ No debris in the containment.
- ☐ Spill kits, sorbents and mats the Plan relies on are on site in the amounts it lists. 112.7(c)

3 Drainage and valves

112.9(b)(1) • 112.9(b)(2)

- ☐ Dike drain valves closed and sealed. They open only to drain uncontaminated rainwater. 112.9(b)(1)
- ☐ Rainwater inspected and any oil removed before draining; the drainage is logged. 112.9(b)(1)
- ☐ Ditches, road ditches, oil traps, sumps and skimmers inspected; any oil removed promptly. 112.9(b)(2)
- ☐ If the containment is never drained, you can say how rainwater leaves it. Inspectors ask. EPA guidance

4 Tanks, vessels and piping

112.9(c) · 112.9(d)

☐	Tanks: no weeps, drip marks, corrosion, cracks or bulging. Foundations and supports level, with no settling or gaps.	112.9(c) (3)
☐	The overflow safeguard the Plan names (capacity, equalizing lines, vacuum protection or high-level sensors) is installed and working.	112.9(c) (4)
☐	Separators, heater-treaters, gun barrels: dump valves and fittings dry. If you use the inspect-and-repair alternative, the inspections are recorded.	112.9(c) (5)
☐	Produced water tanks: if you use the skimming alternative, the procedure was followed and recorded.	112.9(c) (6)
☐	Flange joints, valve glands and bodies, bleeder and gauge valves and the polish rod stuffing box dry; drip pans emptied; pipe supports sound.	112.9(d) (1)
☐	Load-out: hose connection over containment, caps on.	
☐	Saltwater disposal: inspected often, especially after a sudden temperature change.	112.9(d) (2)
☐	Flowlines and gathering lines: supports sound, no stains or dead vegetation along the route; inspections match the written maintenance program.	112.9(d) (4)

Watch the alternatives. They hold only while the inspection program runs. A discharge over 1,000 gallons, or over 42 gallons in each of two discharges within 12 months, means sized containment within six months (112.9(c) (5) (iv), 112.9(c) (6)).

5 Records, training and the Plan

112.3 · 112.7

☐	This inspection done on the schedule written in the Plan, to its written procedures.	112.7(e)
☐	Signed inspection, test and drainage records on file for the past three years, kept with the Plan.	112.7(e)
☐	Facility diagram matches what is on the pad today, including anything added since the last amendment.	112.7
☐	Oil-handling personnel trained; a person accountable for discharge prevention named; briefing held at least once a year.	112.7(f)
☐	Plan reviewed at least once every five years and the review documented; changes that affect discharge potential written in within six months.	EPA checklist
☐	Plan kept at the facility if it is attended at least four hours a day, otherwise at the nearest field office.	EPA checklist
☐	Plan certification (PE, or self-certified Tier I / Tier II) still matches the site's capacity and spill history.	112.3(d), (g)
☐	Every defect found today has a repair noted, with the date. A found-and-fixed record shows the program working.	

Inspector signature _____

Supervisor signature _____

Date _____

When to call us

(940) 612-2286

- The calculation comes up short for the largest tank plus rain.
- A liner is cut or past repair, or berm walls are eroded or pushed down.
- Equipment went inside the berm, or a tank was swapped for a bigger one.
- Temporary tanks, service trucks or transfer points need containment while work goes on.

We build and install containment; we do not write or certify SPCC Plans. Have the tank sizes and a rough site layout ready, or send them through [sitesafeteam.com](https://www.sitesafeteam.com).

Sources

1. eCFR, 40 CFR Part 112, Oil Pollution Prevention: 112.3, 112.7, 112.8, 112.9. [ecfr.gov/current/title-40/chapter-I/subchapter-D/part-112](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-112)
2. US EPA, SPCC Field Inspection and Plan Review Checklist: Onshore Oil Drilling, Production and Workover Facilities (June 2014). [epa.gov/sites/default/files/2014-07/documents/onshore_production_checklist_june_2014_for_web_0.pdf](https://www.epa.gov/sites/default/files/2014-07/documents/onshore_production_checklist_june_2014_for_web_0.pdf)
3. US EPA, SPCC Guidance for Regional Inspectors, Chapter 4: Secondary Containment and Impracticability (Dec 16, 2013). [epa.gov/sites/default/files/2014-04/documents/4_secondarycontainment_impracticability_2014.pdf](https://www.epa.gov/sites/default/files/2014-04/documents/4_secondarycontainment_impracticability_2014.pdf)
4. US EPA, SPCC Rule schedules for inspections, tests, and evaluations. [epa.gov/oil-spills-prevention-and-preparedness-regulations/spcc-rule-schedules-inspections-tests-and](https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/spcc-rule-schedules-inspections-tests-and)
5. NOAA Atlas 14 Precipitation Frequency Data Server (point estimate, Midland International Airport, TX). hdsc.nws.noaa.gov/pfds

General information, not a compliance determination for your site. Your SPCC Plan, the engineer who certified it and the authority having jurisdiction set what applies.