Attachment 2A

U.S. ENVIRONMENTAL PROTECTION AGENCY
SUMMARY OF SPCC DEFICIENCIES

Onshore Facilities (Excluding drilling, production and workover)

Facility Name/Address: Fawcett Energy **Facility Start Date:** 2015

Inspector: Karissa Oakes **Date:** 1/14/25 **SPCC #:**

Citation	Deficiency	Plan	Field
112.3(a)	No Spill Prevention Control and Countermeasures Plan		
112.3(d); 112.6(a)(1) or (b)(1)	Plan not certified by a Professional Engineer (PE), not self-certified, or incomplete		
112.3(e)(1) or (2)	Plan not maintained on site or not available for review		
112.3(g)	Plan self-certified (or Tier I template used) though not eligible		
112.5(a)	No plan amendment(s) after change in: design, construction, operation, or maintenance	X	X
112.5(b)	No evidence of five year review of plan by owner/operator		
112.5(c); 112.6(a)(2) or (b)(2)	Technical amendments(s) not certified by a PE or self-certified		
112.6(b)(2)	PE certified portions of Plan not certified by a PE following technical amendments		
112.6(b)(3)	Deviations from the SPCC rule requirements are not certified by a PE		
112.7	No signed management approval of plan		
112.7	Plan does not follow sequence or have a cross reference		
112.7(a)(2)	No or inadequate environmental equivalent for deviations from requirements		
112.7(a)(3)	No or incomplete facility diagram		
112.7(a)(3)(i)	No or incomplete listing of type of oil and storage capacity of containers		
112.7(a)(3)(ii)	No or inadequate description of discharge prevention measures		
112.7(a)(3)(iii)	No or inadequate description of drainage controls		
112.7(a)(3)(iv)	No/inadequate description of countermeasures for discharge discovery, response, cleanup		
112.7(a)(3)(v)	No or inadequate description of disposal methods for recovered materials		
112.7(a)(3)(vi)	No or incomplete contact list & phone numbers for response & reporting discharges		
112.7(a)(4)	No or inadequate procedures for reporting discharges		
112.7(a)(5)	No or inadequate procedures for use in an emergency		
112.7(b) or 112.6(a)(3)(i)	Plan has inadequate or no prediction of equipment failure which could result in discharges		
112.7(c)	No or inadequate containment and/or diversionary structures to prevent a discharge		X
112.7(d)	No or inadequate demonstration that secondary containment is impracticable		
112.7(d)	No periodic integrity and leak testing of containers, valves and piping when impracticability is claimed for bulk storage containers		
112.7(d)(1)	No or inadequate: contingency plan per 40 CFR part 109 or FRP under 112.20		
112.7(d)(2)	No written commitment of manpower, equipment, and materials		
112.7(e)	Inspections and tests not in accordance with written procedures in Plan		X
112.7(e)	Record of inspections are not signed by facility supervisor		X
112.7(e)	Record of inspections are not maintained for three years		X
112.7(f)(1)	No training of oil-handling personnel on discharge prevention		X
112.7(f)(2)	No designated person responsible for spill prevention		X
112.7(f)(3)	Spill prevention briefings are not conducted at least annually		X
112.7(g)	No or inadequate description of facility security		
112.7(h)(1)	Loading/unloading rack drainage does not flow to containment		
112.7(h)(1)	Containment system does not hold at least the maximum capacity of the largest single compartment of any tank car or tank truck using the rack		

Deficiencies found during the inspection are marked with an "X"

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Citation	Deficiency	Plan	Field
112.7(h)(2)	No interlocked warning light, physical barrier system, or warning signs to prevent vehicular departure before complete disconnect from transfer lines		
112.7(h)(3)	No inspection of lowermost drains/outlets prior to filling and departure of any tank car/truck		
112.7(i)	Plan has no or inadequate procedures to evaluate brittle fracture or catastrophic failure		
112.7(j)	No discussion of conformance with applicable State rules, regulations, and guidelines		
112.7(k)	Oil-filled operational equipment (OFOE) has no or inadequate secondary containment in accordance with 112.7(c) and does not meet eligibility criteria in 112.7(k)(1)		
112.7(k)(2)(i)	No established and documented procedures for inspections or monitoring program for qualified OFOE to detect equipment failure and/or a discharge		
112.7(k)(2)(ii)(A)	No or inadequate: contingency plan per 40 CFR part 109 or FRP under 112.20		
112.7(k)(2)(ii)(B)	No written commitment of manpower, equipment, and materials		
112.8(b)(1)	Drainage from diked areas not restrained by valves or manual pumps/ ejectors		
112.8(b)(2)	Valves used to drain diked areas are not of manual, open-and-closed design		
112.8(b)(3)	Drainage from undiked areas not designed to flow to ponds, lagoons, or catchment basins inside facility; or catchment basins located in area subject to periodic flooding		
112.8(b)(4)	No diversion systems to return spills to the facility		
112.8(b)(5)	Two “lift” pumps not provided if more than one treatment unit needed or facility drainage not engineered to prevent discharge as described in 112.1(b)		
112.8(c)(1)	Material/construction of containers not compatible with oil stored and/or storage conditions		
112.8(c)(2) or 112.6(a)(3)(ii)	No secondary containment or inadequately sized to contain largest single container with freeboard for precipitation.		
112.8(c)(2)	Materials or construction of secondary containment are not sufficiently impervious		
112.8(c)(3)(i)	Bypass valve not sealed closed when drainage is to a storm drain or open watercourse		
112.8(c)(3)(ii)	Retained rainwater not inspected to ensure presence will not cause a discharge		X
112.8(c)(3)(iii)	Bypass valves not opened and later resealed under supervision		
112.8(c)(3)(iv)	Adequate records of drainage events are not maintained		
112.8(c)(4) & *112.8(c)(5)*	Completely or partially buried metallic tanks are not protected from corrosion or are not subject to regular leak testing		
112.8(c)(6)	Aboveground containers not integrity tested on a regular schedule or when repaired.		X
112.8(c)(6)	Testing/inspection not in accordance with industry standards to identify the appropriate qualifications for inspection/testing personnel or frequency or type of testing/inspection	X	X
112.8(c)(6)	Containers and container supports not inspected.		X
112.8(c)(6)	Outside of container not frequently inspected for signs of deterioration, or oil discharges		X
112.8(c)(6)	No records of inspections/tests or comparison records not kept		X
112.8(c)(7)	Steam return and exhaust lines of internal heating coils which discharge into an open water course are not monitored or passed through a separation system		
112.8(c)(8) or 112.6(a)(3)(iii)	No liquid level sensing devices or other overfill prevention systems provided or not regularly tested		
112.8(c)(9)	Effluent treatment facilities which discharge directly to waters not observed frequently enough to detect system upsets		
112.8(c)(10)	Leaks in diked area are not promptly corrected or oil in diked areas not removed		
112.8(c)(11) or 112.6(a)(3)(ii)	Mobile or portable containers not positioned to prevent discharge as described in 112.1(b) or no/inadequate secondary containment for mobile or portable containers.		X
112.8(d)(1)	Buried piping installed or replaced after August 16, 2002 is not corrosion protected		
112.8(d)(1)	Exposed buried piping not inspected for deterioration or corrected		
112.8(d)(2)	Out-of service or standby piping not capped or blank flanged or marked as to origin		
112.8(d)(3)	Pipe supports not properly designed		
112.8(d)(4)	Aboveground valves, piping, and appurtenances not inspected		X
112.8(d)(4)	Buried piping not integrity/leak tested when installed, modified, relocated, or replaced		
112.8(d)(5)	Vehicles not warned of aboveground piping or other oil transfer operations		

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Citation	Deficiency	Plan	Field
112.20(e)	No certification of the applicability of the substantial harm criteria		

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