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Environmental Health & Safety From Experience

Oil SPCC and Tank Integrity Testing

Facilities that have bulk oil storage containers (i.e., tanks) and are subject to Oil Spill Prevention, Control and Countermeasure (SPCC) requirements must meet tank integrity testing requirements as detailed in the *Oil Pollution Prevention Regulations 40 CFR 112.8(c)(6) {Bulk Storage Containers}*.

While the US Environmental Protection Agency (USEPA) rules do provide some flexibility on the testing (e.g., allowing industry standards to be used), aboveground containers must be tested for integrity on a regular schedule, and whenever material repairs are made. The frequency and type of testing depends on the size and design of the container (e.g., floating roof, skid-mounted, elevated, or partially buried), and visual inspections must be combined with another testing technique, e.g., hydrostatic, radiographic, ultrasonic, acoustic, or other non-destructive testing. The container's supports and foundations must also be inspected, and the outside of the container must be frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. All inspection records and tests, including comparison records, must be kept under usual and customary business practices. It is normal practice to hire a contractor specializing in tank inspections to conduct this work.

Integrity testing, however, is NOT required if the tank meets all of these conditions:

1. A shop-built tank,
2. Less than 5,000 gallons, and,
3. The tank has all sides visible (elevated) or the tank rests on an impervious surface (e.g., synthetic liner or concrete).

The key here is that any leak would be readily identifiable and can be controlled before release into the environment. Even so, periodic, routine

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EXPERIENCE IN BRIEF

To continue to improve employee health and safety, consider focusing on issues that tend to fall through the cracks. Some frequent issues Hixson sees include: locks for lockout/tagout operations not differentiated from those used for other tasks at the facility; emergency respirators not maintained or inspected on a weekly basis; missing guards from conveyors (creating nip points); and maintenance welding/cutting gases (e.g., acetylene and oxygen) stored together and not secured with chains or in holding cages.

inspections are still required, and the site-specific Oil SPCC Plan must identify the bulk containers and method(s) used to inspect. One exception? Milk and milk product containers (tanks) and associated piping and appurtenances are exempt from the Oil SPCC requirements, provided they are constructed according to current, applicable 3-A Sanitary Standards and are subject to the current applicable Grade "A" Pasteurized Milk Ordinance (PMO) or a state equivalent. Be careful though: Even though certain (animal) milk products are exempt, this does not mean all dairy-type materials are: Soy-based or almond-based yogurts, cheeses, and milks are considered vegetable-based oils, not dairy, and thus are subject to the full Oil SPCC regulation, including tank integrity testing.

While the vast majority of the GMP facilities where Hixson performs work do not require tank integrity testing due to the prevalence of shop-built tanks, certain steps must still be followed. When signing off on the Oil SPCC Plan, the certifying engineer and/or owner make the decision regarding applicability based upon the industry standards specified above. Assuming a plant's Oil SPCC plan does not require integrity testing for exempted storage tanks, the person conducting routine inspections (i.e., weekly, monthly, or annually) must be trained on the criteria and the checklist being used for the inspections. The initial inspection (i.e., baseline) must be maintained along with at least three years of data/inspections. This data will aid in determining when a tank may need to be repaired and/or replaced.

[Attachment 3.2 of USEPA's Tier I template](#) shows a standard for inspection schedules. Even if not using the USEPA template, this information can be helpful to include in your plan.

RELATED CONTENT

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