

MIDWEST TRAINING AND CONSULTING SERVICES (MTCS)

Midwest Training and Consulting Services (MTCS) started in April 1996 as an independent safety, health and environmental consulting services. WE ARE THE PREMIER PROVIDER OF THE EPA'S SPILL PREVENTION PLANS (SPCC) in the four state areas of Kansas, Missouri, Iowa and Nebraska. We completed over 60 last year and nearly 450 plans in the total.

DO YOU NEED SPCC PLAN?

Companies meet the threshold of the SPCC Plan (40 CFR 112.7) requirement (1,320 gallons of oil products (fuels, fluids, and lubricants). This includes all containers 55 gallons or greater - drums, totes, tanks, electrical equipment and equipment reservoirs new or used. Once the threshold is met you will need to have a Spill Prevention Control and Countermeasure Plan. This law has been in place since 1973 and has had many changes since that date. You should complete these documents as soon as possible, so you will know what changes to your facility and operations the Professional Engineer will require meeting the EPA rules.

I recently reviewed of all EPA Inspections of locations where SPCC Plan's were the reason for the inspection. The following information is based on inspections where no fuel or oil was released. 85% of all SPCC Plans inspected had deficiencies including no SPCC Plans completed with fines assessed.

Technical Amendments: Technical changes to your facility operations and bulk storage containers must be approved by a Professional Engineer. You have 6 months to make these amendments to your facility once the change has been made.

Every Year: Your management official should review the document for any changes and if technical amendments are noted. A review of your facility, training and recordkeeping should also be checked.

Five Year Review: EPA requires a management official to review the SPCC Plan every five years. This has two important requirements bring your SPCC Plan update with changes the EPA has made in past five years and changes to your facility in the past five years.

Other inspections violations include 45% of the locations had deficiencies related to inspections and 50% of the locations had not completed required training. 95% of the locations had not completed the integrity testing of the bulk storage containers. We can assist your organization with our training and inspection workbooks and we can complete the tank inspections for steel – shop built tanks.

For more information about Midwest Training and Consulting Services, please give us a call at 888-665-0728, visit our website at www.midwest-training.com.