SPCC Program Audit

Program Audit Checklist

Facility Name:	
Auditor:	
Date:	
Audit Period:	

Regulatory References

The following regulations and guidance documents are applicable to this program audit. Click any link to view the full text.

Regulation / Guidance Document
40 CFR Part 112 — Oil Pollution Prevention (Full Text)
40 CFR 112.5 — Amendment of SPCC Plan by Owners/Operators
40 CFR 112.7 — General Requirements for SPCC Plans
40 CFR 112.20 — Facility Response Plans
EPA SPCC Rule Overview and Guidance
Clean Water Act Section 311 — Oil and Hazardous Substance Liability

Instructions: Review each audit item and record findings in the Status and Notes columns. Use C (Compliant), NC (Non-Compliant), NA (Not Applicable), or NR (Needs Review) for the status. Document specific findings, evidence reviewed, and any corrective actions needed in the Notes column.

Plan Documentation

Audit Item	Expected Finding	Status	Notes / Evidence
Plan availability	Current SPCC Plan is maintained at the facility and available for EPA inspection. Plan is accessible to all operating personnel. A copy is available at the facility 24/7, not just during business hours. » *Ref: 40 CFR 112.3(a)*		
PE certification	Plan is certified by a licensed Professional Engineer (PE). PE certification is current and has been renewed within the last five years or after any significant amendment. Self-certified plans (Tier I qualified facilities) meet all eligibility criteria. » *Ref: 40 CFR 112.3(d)*		
Five-year review	Plan has been reviewed and re-certified within the last five years per 40 CFR 112.5(b). Review date and PE signature are documented. If changes were needed, amendments were made and certified before implementation. » *Ref: 40 CFR 112.5(b)*		
Facility diagram	Plan includes a facility diagram showing all oil storage containers, transfer stations, connecting piping, drainage patterns, secondary		

Audit Item	Expected Finding	Status	Notes / Evidence
	containment, and proximity to navigable waters. Diagram is current and reflects the actual facility layout. » Ref: 40 CFR 112.7(a)(3)		
Oil storage inventory	All oil storage containers are listed with type, capacity, and contents. Total facility storage capacity is accurately calculated. Underground and aboveground containers are listed separately. » Ref: 40 CFR 112.7(a)(3)(i)		

Secondary Containment

Audit Item	Expected Finding	Status	Notes / Evidence
Containment adequacy	Secondary containment is sized to hold the volume of the largest single container plus sufficient freeboard for precipitation. Bulk storage containers have dikes, berms, or retaining walls. Containment is impervious to oil and maintained in good condition. » Ref: 40 CFR 112.7(c)		
Drainage controls	Containment areas have controlled drainage. Valves on containment drains are maintained in the closed position. Procedures exist for inspecting and draining accumulated stormwater. Discharge of contaminated water is prevented. » Ref: 40 CFR 112.8(b)(1)-(2)		
Loading/unloading areas	Transfer areas have spill containment or drainage to a central impoundment. Procedures require monitoring during transfers. Communication protocol between driver and facility operator is established. » Ref: 40 CFR 112.7(h)		

Operating Procedures

Audit Item	Expected Finding	Status	Notes / Evidence
Oil handling procedures	Written procedures exist for all oil handling operations including filling, transferring, and dispensing. Procedures address normal operations, startup, and shutdown. Overfill prevention measures are documented. » Ref: 40 CFR 112.7(e)		
Inspection procedures	Routine inspection schedule is documented and being followed. Inspection records are maintained for at least three years. Inspection frequency meets 40 CFR 112.7(e) requirements. » Ref: 40 CFR 112.7(e)		
Discharge notification	Procedures are in place for immediate notification of an oil discharge. Contact information for the National Response Center (1-800-424-8802), state agencies, and local responders is current and posted. » Ref: 40 CFR 112.7(a)(4), 40 CFR 110.6		

Audit Item	Expected Finding	Status	Notes / Evidence
Personnel training	Oil handling personnel have received SPCC training. Training covers oil handling procedures, spill response, and discharge prevention. Training records are maintained and include dates, topics, and attendees. » *Ref: 40 CFR 112.7(f)*		

Facility Review

Audit Item	Expected Finding	Status	Notes / Evidence
Physical changes	All facility modifications since last plan review have been evaluated for SPCC impact. New tanks, piping changes, or operational changes are reflected in the plan. Plan amendment was completed within six months of any change. » *Ref: 40 CFR 112.5(a)*		
Spill history	All spill events have been documented and reviewed. Root cause analysis was performed for each discharge. Plan amendments address any recurring issues. Reportable spill history is included in the plan. » *Ref: 40 CFR 112.7(a)(5)*		
Integrity testing	Bulk storage containers are on an integrity testing schedule per industry standards (API 653, STI SP001). Test results are documented and any identified deficiencies have been corrected. » *Ref: 40 CFR 112.8(c)(6)*		
Security measures	Oil storage areas have appropriate security measures including fencing, lighting, locks, and signage. Unauthorized access is prevented. Measures are documented in the plan. » *Ref: 40 CFR 112.7(g)*		

Corrective Actions Summary

#	Finding	Corrective Action	Responsible	Due Date
1				
2				
3				
4				
5				

Audit Sign-Off

Auditor Name:

Auditor Signature:

Date Completed:

Reviewed By:

Review Date:

Status Key: C = Compliant | NC = Non-Compliant | NA = Not Applicable | NR = Needs Review