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AGGREGATES SPCC COMPLIANCE PLAN FOR CONCRETE CRUSHING FACILITY

PROJECT OVERVIEW

[Central Florida](#)

ESE supported an aggregates and concrete crushing facility in Central Florida with development of a Spill Prevention, Control, and Countermeasure Plan. The site receives, stages, and processes bulk materials outdoors and maintains petroleum storage to support mobile equipment and facility operations. The engagement addressed oil storage, transfer practices, drainage pathways, inspection procedures, and spill response readiness under federal SPCC requirements.

CHALLENGES

The facility was subject to EPA SPCC requirements under 40 CFR Part 112 due to regulated aboveground oil storage capacity and proximity to potential drainage pathways. Oil storage included double-walled diesel ASTs and used oil drums, with site drainage generally directed toward onsite stormwater controls and ultimately a receiving water pathway. The operational layout included active haul roads, stockpile areas, portable crushing equipment, and contractor traffic, requiring practical controls that could be implemented without disrupting production.

ESE'S APPROACH

ESE evaluated facility operations, oil storage areas, secondary containment, transfer practices, stormwater flow direction, and emergency response resources. The SPCC Plan was prepared under the supervision of a Professional Engineer and aligned with 40 CFR 112 requirements for onshore non-production facilities. ESE developed a facility-specific compliance framework integrating prevention measures, inspection checklists, training records, discharge response procedures, and agency notification protocols.

KEY ELEMENTS IMPLEMENTED

- Prepared PE-certified SPCC Plan consistent with 40 CFR Part 112
- Documented ASTs, drums, storage capacities, contents, and flow paths
- Verified secondary containment for double-walled diesel ASTs
- Established daily, monthly, and annual inspection procedures
- Developed discharge response, waste handling, and notification forms
- Created training, containment drainage, and inspection recordkeeping tools

RESULTS

The facility received an implementation-ready SPCC Plan that clarified compliance responsibilities, inspection frequency, spill response procedures, and required records. ESE's work improved regulatory defensibility by linking facility conditions to applicable SPCC provisions, including containment, inspections, transfer operations, personnel training, and emergency notifications. The plan also confirmed that the facility did not meet substantial harm criteria under 40 CFR Part 112.

PROJECT IMPACT

The SPCC program provided a practical compliance structure for an active aggregates operation with petroleum storage and frequent material handling activities. By integrating inspection checklists, response procedures, and recordkeeping logs into routine operations, the facility improved audit readiness and reduced risk of uncontrolled oil discharges. The final plan supports ongoing compliance management as equipment, storage, or site operations change.