

# SPCC Enforcement: U.S. Environmental Protection Agency and Tullytown, Pennsylvania, Oil Company Enter into Expedited Settlement Agreement



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The United States Environmental Protection Agency (“EPA”) and Meenan Oil Company (“MOC”) entered into a March 29th Expedited Settlement Agreement (“ESA”) addressing alleged violations of the Clean Water Act Oil Pollution Prevention Regulations. See Docket No.: CWA-03-2023-0041.

MOC is stated to operate a facility (“Facility”) in Tullytown, Pennsylvania.

EPA is stated to have undertaken an inspection of the Facility on September 29, 2021. The inspection is stated to have addressed the Facility’s compliance with the Oil Prevention Regulations promulgated at 40 CFR Part 112 under Section 311(j) of the Clean Water Act.

The alleged violations are stated to include:

- Failure to describe in the Spill Prevention, Control, and Countermeasure (“SPCC”) Plan the physical layout of the Facility and include a Facility diagram
- Failure to ensure that the SPCC Plan addresses the type of oil in each container and its storage capacity
- Failure to ensure that the SPCC Plan contains a contact list and phone numbers for the Facility response coordinator, National Response Center, cleanup contractors, and all appropriate federal, state, and local agencies
- Failure to predict the direction, rate of flow, and total quantity of oil which could be discharged from the Facility as a result of each major type of equipment failure
- Failure to provide complete discussions pertaining to secondary containment and/or diversionary structures or equipment to prevent discharged oil from reaching a navigable water
- Failure to implement requirements pertaining to Inspections, Tests, and Records and ensure that the inspections are conducted in accordance with written inspection procedures included in the Plan
- Failure to provide complete discussions and implement requirements pertaining to secondary containment or an inspection/monitoring program for oil-filled operational equipment
- Failure to provide complete discussions and implement requirements pertaining to Bulk Storage Containers

A civil penalty of \$5,900 is assessed.

A copy of the ESA can be downloaded [here](#).