U.S. ENVIRONMENTAL PROTECTION AGENCY
SPCC FIELD INSPECTION AND PLAN REVIEW CHECKLIST

TIER I QUALIFIED FACILITIES

Overview of the Checklist

This checklist is designed to assist EPA inspectors in conducting a thorough and nationally consistent inspection of a facility's compliance with the Spill Prevention, Control, and Countermeasure (SPCC) rule at 40 CFR part 112. It is a required tool to help federal inspectors (or their contractors) record observations for the site inspection and review of the SPCC Plan. While the checklist is meant to be comprehensive, the inspector should always refer to the SPCC rule in its entirety, the SPCC Regional Inspector Guidance Document, and other relevant guidance for evaluating compliance. This checklist must be completed in order for an inspection to count toward an agency measure (i.e., OEM inspection measures or GPRA). The completed checklist and supporting documentation (i.e. photo logs or additional notes) serve as the inspection report.

This checklist addresses requirements for Tier I Qualified Facilities that meet the eligibility criteria set forth in §112.3(g)(1).

Separate and standalone checklists address the requirements for:
Onshore facilities including Tier II Qualified Facilities (excluding oil drilling, production and workover facilities);
Onshore oil drilling, production and workover facilities including Tier II Qualified Facilities as defined in §112.3(g)(2); and
Offshore drilling, production and workover facilities

Tier I Qualified Facilities must meet the rule requirements in §112.6 and other applicable sections specified in §112.6. The checklist is organized according to the SPCC rule. Each item in the checklist identifies the relevant section and paragraph in 40 CFR part 112 where that requirement is stated.

- Sections 112.1 through 112.5 specify the applicability of the rule and requirements for the preparation, implementation, and amendment of SPCC Plans. For these sections, the checklist includes data fields to be completed, as well as several questions with "yes," "no" or "NA" answers.
- Section 112.6 includes requirements for Tier I qualified facilities.
- Section 112.7 includes general requirements that apply to all facilities (unless otherwise excluded).

Attachments

- Attachment A is a checklist for Sections 112.8 and 112.12. This checklist specifies requirements for spill prevention, control, and countermeasures for onshore facilities (excluding oil production facilities).
- Attachment B is a checklist that specifies requirements for spill prevention, control, and countermeasures for onshore oil production facilities (112.9 provisions) and onshore drilling and workover facilities (112.10 provisions)
- Attachment C is for recording information about containers and other locations at the facility that require secondary containment.
- Attachment D is a checklist for documenting the tests and inspections the facility operator is required to keep with the SPCC Plan.
- Attachment E is a checklist for oil spill contingency plans following 40 CFR 109. Unless a facility has submitted a Facility Response Plan (FRP) under 40 CFR 112.20, a contingency plan following 40 CFR 109 is required if a facility the owner or operator of a facility with qualified oil-filled operational equipment chooses to implement alternative requirements instead of general secondary containment requirements as provided in 40 CFR 112.7(k).
- Attachment F is for recording additional comments or notes.
- Attachment G is for recording information about photos.

The inspector needs to evaluate whether the requirements in the checklist are addressed adequately or inadequately in the SPCC Plan and whether it is implemented adequately in the field (either by field observation or record review). For the SPCC Plan and implementation in the field, if a requirement is addressed adequately, mark the "Yes" box in the appropriate column. If a requirement is not addressed adequately, mark the "No" box. If a requirement does not apply to the particular facility or the question asked is not appropriate for the facility, mark as "NA". Discrepancies or descriptions of inspector interpretation of "No" vs. "NA" may be documented in the comments box subsequent to each section. If a provision of the rule applies only to the SPCC Plan, the "Field" column is shaded.

Space is provided throughout the checklist to record comments. Additional space is available as Attachment F at the end of the checklist. Comments should remain factual and support the evaluation of compliance.

FACILITY INFORMATION			
FACILITY NAME:			
LATITUDE:	LONGITUDE:	GPS DATUM:	
Section/Township/Range:	FRS#/OIL DATABASE ID:	ICIS#:	
ADDRESS:			
CITY:	STATE:	ZIP:	COUNTY:
MAILING ADDRESS (IF DIFFERENT FROM FACILITY ADDRESS – IF NOT, PRINT "SAME"):			
CITY:	STATE:	ZIP:	COUNTY:
TELEPHONE:	FACILITY CONTACT NAME/TITLE:		
OWNER NAME:			
OWNER ADDRESS:			
CITY:	STATE:	ZIP:	COUNTY:
TELEPHONE:	FAX:	EMAIL:	
FACILITY OPERATOR NAME (IF DIFFERENT FROM OWNER – IF NOT, PRINT "SAME"):			
OPERATOR ADDRESS:			
CITY:	STATE:	ZIP:	COUNTY:
TELEPHONE:	OPERATOR CONTACT NAME/TITLE:		
FACILITY TYPE:			NAICS CODE:
HOURS PER DAY FACILITY ATTENDED:		TOTAL FACILITY CAPACITY:	
TYPE(S) OF OIL STORED:			
LOCATED IN INDIAN COUNTRY? ☐ YES ☐ NO RESERVATION NAME:			

INSPECTION/PLAN REVIEW INFORMATION		
PLAN REVIEW DATE:	REVIEWER NAME:	
INSPECTION DATE:	TIME:	ACTIVITY ID NO:
LEAD INSPECTOR:		
OTHER INSPECTOR(S):		

INSPECTION ACKNOWLEDGMENT	
I performed an SPCC inspection at the facility specified above.	
INSPECTOR SIGNATURE:	DATE:
SUPERVISOR REVIEW/SIGNATURE:	DATE:

SPCC GENERAL APPLICABILITY—40 CFR 112.1

IS THE FACILITY REGULATED UNDER 40 CFR part 112?

The completely buried oil storage capacity is over 42,000 U.S. gallons, **OR** the aggregate aboveground oil storage capacity is over 1,320 U.S. gallons **AND** ☐ Yes ☐ No

The facility is a non-transportation-related facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States ☐ Yes ☐ No

AFFECTED WATERWAY(S):	DISTANCE:

FLOW PATH TO WATERWAY:

Note: The following storage capacity is not considered in determining applicability of SPCC requirements:

- *Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993; Tank trucks that return to an otherwise regulated facility that contain only residual amounts of oil (EPA Policy letter)*
- *Completely buried tanks subject to all the technical requirements of 40 CFR part 280 or a state program approved under 40 CFR part 281;*
- *Underground oil storage tanks deferred under 40 CFR part 280 that supply emergency diesel generators at a nuclear power generation facility licensed by the Nuclear Regulatory Commission (NRC) and subject to any NRC provision regarding design and quality criteria, including but not limited to CFR part 50;*
- *Any facility or part thereof used exclusively for wastewater treatment (production, recovery or recycling of oil is not considered wastewater treatment); (This does not include other oil containers located at a wastewater treatment facility, such as generator tanks or transformers)*
- *Containers smaller than 55 U.S. gallons;*
- *Permanently closed containers (as defined in §112.2);*
- *Motive power containers (as defined in §112.2);*
- *Hot-mix asphalt or any hot-mix asphalt containers;*
- *Heating oil containers used solely at a single-family residence;*
- *Pesticide application equipment and related mix containers;*
- *Any milk and milk product container and associated piping and appurtenances; and*
- *Intra-facility gathering lines subject to the regulatory requirements of 49 CFR part 192 or 195.*

Does the facility have an SPCC Plan? ☐ Yes ☐ No

SPCC TIER I QUALIFIED FACILITY APPLICABILITY—40 CFR 112.3(g)(1),(2)

The aggregate aboveground oil storage capacity is 10,000 U.S. gallons or less **AND** ☐ Yes ☐ No

The capacity of each individual aboveground oil storage container is 5,000 U.S. gallons or less **AND** ☐ Yes ☐ No

In the three years prior to the SPCC Plan self-certification date, or since becoming subject to the rule (if the facility has been in operation for less than three years), the facility has **NOT** had:

- A single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons, **OR** ☐ Yes ☐ No
- Two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve-month period[1] ☐ Yes ☐ No

IF ***YES*** TO ALL OF THE ABOVE, THEN THE FACILITY IS CONSIDERED A TIER I QUALIFIED FACILITY.[2]

Comments:

[1] Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

[2] An owner/operator who self-certifies a Tier I SPCC Plan may not include any environmentally equivalent alternatives or secondary containment impracticability determinations in the SPCC Plan

REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC PLAN—40 CFR 112.3		
Date facility began operations:		
Date of initial SPCC Plan preparation:	Current Plan version (date/number):	
112.3(a)	**For facilities (except farms), including mobile or portable facilities:** • In operation on or prior to November 10, 2011: Plan prepared and/or amended and fully implemented by **November 10, 2011** • Facilities beginning operation after November 10, 2011: ○ *Oil production facilities* - Plan prepared and fully implemented within six months after beginning operations; or ○ *All other facilities* - Plan prepared and fully implemented before operations begin	☐ Yes ☐ No ☐ NA ☐ Yes ☐ No ☐ NA ☐ Yes ☐ No ☐ NA
	For farms (as defined in §112.2): • In operation on or prior to August 16, 2002: Plan maintained, amended and implemented by **May 10, 2013** • Beginning operations after August 16, 2002 through May 10, 2013: Plan prepared and fully implemented by **May 10, 2013** • Beginning operations after May 10, 2013: Plan prepared and fully implemented before beginning operations	☐ Yes ☐ No ☐ NA ☐ Yes ☐ No ☐ NA ☐ Yes ☐ No ☐ NA
112.3(e)(1)	Plan is available onsite if attended at least 4 hours per day. If facility is unattended, Plan is available at the nearest field office. *(Please note nearest field office contact information in comments section below.)*	☐ Yes ☐ No ☐ NA
Comments:		

AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112.4		
112.4(a),(c)	Has the facility discharged more than 1,000 U.S. gallons of oil in a single reportable discharge or more than 42 U.S. gallons in each of two reportable discharges in any 12-month period?[3]	☐ Yes ☐ No
If **YES**	• Was information submitted to the RA as required in §112.4(a)?[4]	☐ Yes ☐ No ☐ NA
	• Was information submitted to the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located§112.4(c)	☐ Yes ☐ No ☐ NA
	• Date(s) and volume(s) of reportable discharges(s) under this section: _____	
	• Were the discharges reported to the NRC[5]?	☐ Yes ☐ No
112.4(d),(e)	Have changes required by the RA been implemented in the Plan and/or facility?	☐ Yes ☐ No ☐ NA
Comments:		

[3] A reportable discharge is a discharge as described in §112.1(b)(see 40 CFR part 110). The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination

[4] Triggering this threshold may disqualify the facility from meeting the Qualified Facility criteria if it occurred in the three years prior to self-certification

[5] Inspector Note-Confirm any spills identified above were reported to NRC

AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5		
112.5(a)	Has there been a change at the facility that materially affects the potential for a discharge described in §112.1(b)?	☐ Yes ☐ No
If **YES**	• Was the Plan amended within six months of the change?	☐ Yes ☐ No
	• Were amendments implemented within six months of any Plan amendment?	☐ Yes ☐ No
112.5(b)	Review and evaluation of the Plan completed at least once every 5 years?	☐ Yes ☐ No ☐ NA
	Following Plan review, was Plan amended within six months to include more effective prevention and control technology that has been field-proven to significantly reduce the likelihood of a discharge described in §112.1(b)?	☐ Yes ☐ No ☐ NA
	Amendments implemented within six months of any Plan amendment?	☐ Yes ☐ No ☐ NA
	Five year Plan review and evaluation documented?	☐ Yes ☐ No ☐ NA
112.5(c)	Professional Engineer certification of any technical Plan amendments in accordance with all applicable requirements of §112.3(d) *[Except for self-certified Plans]*	☐ Yes ☐ No ☐ NA

Name:	License No.:	State:	Date of certification:

Reason for amendment:

TIER I QUALIFIED FACILITY PLAN REQUIREMENTS —40 CFR 112.6(a)		
112.6(a)(1)	**Plan Certification:** Plan prepared to comply with the requirements of §112.6(a)(3) using the Appendix G template	☐ Yes ☐ No ☐ NA
(i)	He or she is familiar with the requirements of 40 CFR part 112	☐ Yes ☐ No ☐ NA
(ii)	He or she has visited and examined the facility[6]	☐ Yes ☐ No ☐ NA
(iii)	The Plan has been prepared in accordance with accepted and sound industry practices and standards	☐ Yes ☐ No ☐ NA
(iv)	Procedures for required inspections and testing have been established	☐ Yes ☐ No ☐ NA
(v)	He or she will fully implement the Plan	☐ Yes ☐ No ☐ NA
(vi)	The facility meets the qualification criteria in §112.3(g)(1)	☐ Yes ☐ No ☐ NA
(vii)	The Plan does not deviate from any requirements as allowed by §§112.7(a)(2) and 112.7(d), or include measures pursuant to §112.9(c)(6) for produced water containers and any associated piping	☐ Yes ☐ No ☐ NA
(viii)	The Plan and individual(s) responsible for implementing the Plan have the full approval of management and the facility owner or operator has committed the necessary resources to fully implement the Plan.	☐ Yes ☐ No ☐ NA
112.6(a)(2)	**Technical Amendments:** The owner/operator self-certified the Plan's technical amendments for a change in facility design, construction, operation, or maintenance that affected potential for a §112.1(b) discharge	☐ Yes ☐ No ☐ NA
If **YES**	• Certification of technical amendments is in accordance with the self-certification provisions of §112.6(a)(1).	☐ Yes ☐ No ☐ NA
	An individual oil storage container capacity exceeds 5,000 U.S. gallons or the aggregate aboveground oil storage capacity increased to more than 10,000 U.S. gallons as a result of the change	☐ Yes ☐ No ☐ NA
If **YES**	*The facility no longer meets the Tier I qualifying criteria in §112.3(g)(1) because an individual oil storage container capacity exceeds 5,000 U.S. gallons or the facility aboveground storage capacity exceeds 10,000 U.S. gallons*	
	The following has been or will be completed within six months following the amendment:	
(i)	• Plan prepared and implemented in accordance with the requirements for a Tier II Qualified Facility (§112.6(b)) if the facility meets the eligibility criteria **OR**	☐ Yes ☐ No ☐ NA
(ii)	• Plan prepared and implemented in accordance with the general Plan requirements in §112.7 and applicable requirements in subparts B and C and certified by a PE as required under §112.3(d)	☐ Yes ☐ No ☐ NA

[6] Note that only the person certifying the Plan can make the site visit

112.6(a)(3)(i)	Plan includes a prediction of the direction and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure if there is a reasonable potential for equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of discharge)	☐ Yes ☐ No ☐ NA
(ii)	Bulk storage container installations (except mobile refuelers and other non-transportation-related tank trucks), including mobile or portable oil storage containers, are constructed to provide secondary containment for the entire capacity of the largest single container plus additional capacity to contain precipitation, and	☐ Yes ☐ No ☐ NA
	Mobile or portable oil storage containers positioned or located to prevent a §112.1(b) discharge	☐ Yes ☐ No ☐ NA
(iii)	Plan describes a system or documented procedure to prevent overfills for each container and is regularly tested to ensure proper operation or efficacy	☐ Yes ☐ No ☐ NA
Comments:		

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		**PLAN**	**FIELD**
Management approval at a level of authority to commit the necessary resources to fully implement the Plan[7]		☐ Yes ☐ No	
Plan follows sequence of the rule or is an equivalent Plan meeting all applicable rule requirements and includes a cross-reference of provisions		☐ Yes ☐ No ☐ NA	
If Plan calls for facilities, procedures, methods, or equipment not yet fully operational, details of their installation and start-up are discussed *(Note: Relevant for inspection evaluation and testing baselines.)*		☐ Yes ☐ No ☐ NA	
112.7(a)(3)	Plan addresses each of the following:		
(i)	For each fixed container, type of oil and storage capacity (see Attachment C of this checklist). For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities	☐ Yes ☐ No	☐ Yes ☐ No
(iv)	Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources)	☐ Yes ☐ No	☐ Yes ☐ No
(vi)	Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with an agreement for response, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b)	☐ Yes ☐ No	
112.7(a)(4)	Plan includes information and procedures that enable a person reporting an oil discharge as described in §112.1(b) to relate information on the: • Exact address or location and phone number of the facility; • Date and time of the discharge; • Type of material discharged; • Estimates of the total quantity discharged; • Estimates of the quantity discharged as described in §112.1(b); • Source of the discharge; • A description of all affected media; • Cause of the discharge; • Damages or injuries caused by the discharge; • Actions being used to stop, remove, and mitigate the effects of the discharge; • Whether an evacuation may be needed; • Names of individuals and/or organizations who have also been contacted	☐ Yes ☐ No ☐ NA	
112.7(a)(5)	Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency	☐ Yes ☐ No ☐ NA	
Comments:			

[7] May be part of the Plan or demonstrated elsewhere.

		PLAN	FIELD
112.7(c)	Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in §112.1(b), **except as provided in §112.7(k) of this section for certain qualified operational equipment and §112.9(d)(3) for certain flowlines and intra-facility gathering lines at an oil production facility**. The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method, design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. See Attachment C of this checklist. **For onshore facilities**, one of the following or its equivalent: • Dikes, berms, or retaining walls sufficiently impervious to contain oil, • Curbing or drip pans, • Sumps and collection systems, • Culverting, gutters or other drainage systems, • Weirs, booms or other barriers, • Spill diversion ponds, • Retention ponds, or • Sorbent materials		
	Identify which of the following are present at the facility and if appropriate containment and/or diversionary structures or equipment are provided as described above:		
	☐ Bulk storage containers	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	☐ Mobile/portable containers	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	☐ Oil-filled operational equipment (as defined in 112.2)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	☐ Other oil-filled equipment (i.e., manufacturing equipment)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	☐ Piping and related appurtenances	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	☐ Mobile refuelers or non-transportation-related tank cars	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	☐ Transfer areas, equipment and activities	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	☐ Identify any other equipment or activities that are not listed above:	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
112.7(e)	Inspections and tests conducted in accordance with written procedures	☐ Yes ☐ No	☐ Yes ☐ No
	Record of inspections or tests signed by supervisor or inspector	☐ Yes ☐ No	☐ Yes ☐ No
	Kept with Plan for at least 3 years (see Attachment D of this checklist)[8]	☐ Yes ☐ No	☐ Yes ☐ No
112.7(f)	Personnel, training, and oil discharge prevention procedures		
(1)	Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of SPCC Plan	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(2)	Person designated as accountable for discharge prevention at the facility and reports to facility management	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(3)	Discharge prevention briefings conducted at least once a year for oil handling personnel to assure adequate understanding of the Plan. Briefings highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA

Comments:

[8] Records of inspections and tests kept under usual and customary business practices will suffice

		PLAN	FIELD
112.7(g)	Plan describes how to: • Secure and control access to the oil handling, processing and storage areas; • Secure master flow and drain valves; • Prevent unauthorized access to starter controls on oil pumps; • Secure out-of-service and loading/unloading connections of oil pipelines; and • Address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges	☐ Yes ☐ No ☐ NA *For Oil Production Facilities:* *Select **NA***	☐ Yes ☐ No ☐ NA
112.7(k)	Qualified oil-filled operational equipment is present at the facility[9] *Oil-filled operational equipment means* equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g. , those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.		☐ Yes ☐ No
If YES	Check which apply: Secondary Containment provided in accordance with 112.7(c) ☐ Alternative measure described below (confirm eligibility) ☐		
112.7(k)	Qualified Oil-Filled Operational Equipment • Has a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within the three years prior to Plan certification date?		☐ Yes ☐ No ☐ NA
	• Have two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?[10]		☐ Yes ☐ No ☐ NA
	If **YES** for either, secondary containment in accordance with §112.7(c) is required		
	• Facility procedure for inspections or monitoring program to detect equipment failure and/or a discharge is established and documented	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	Does not apply if the facility has submitted a FRP under §112.20: • Contingency plan following 40 CFR part 109 (see Attachment E of this checklist) is provided in Plan **AND**	☐ Yes ☐ No ☐ NA	
	• Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in Plan	☐ Yes ☐ No ☐ NA	

Comments:

Inspector Note- Complete, as applicable, either Attachment A or B which include additional requirements based on the type of facility.

[9] This provision does not apply to oil-filled manufacturing equipment (flow-through process)

[10] Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

ATTACHMENT A ☐ NA **ONSHORE FACILITIES (EXCLUDING PRODUCTION) 40 CFR 112.8/112.12**		**PLAN**	**FIELD**
112.8(b)/ 112.12(b) Facility Drainage			
Diked Areas (1)	Drainage from diked storage areas is: • Restrained by valves, except where facility systems are designed to control such discharge, **OR** • Manually activated pumps or ejectors are used and the condition of the accumulation is inspected prior to draining dike to ensure no oil will be discharged	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
Comments:			
112.8(c)/112.12(c) Bulk Storage Containers ☐ NA *Bulk storage container* means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container. *If bulk storage containers are not present, mark this section Not Applicable (NA). If present, complete this section and Attachment C of this checklist.*			
(1)	Containers materials and construction are compatible with material stored and conditions of storage such as pressure and temperature	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(3)	Is there drainage of uncontaminated rainwater from diked areas into a storm drain or open watercourse?	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
If **YES**	Bypass valve normally sealed closed	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	• Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	• Bypass valve opened and resealed under responsible supervision	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	• Adequate records of drainage are kept; for example, records required under permits issued in accordance with 40 CFR §§122.41(j)(2) and (m)(3)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(4)	For completely buried metallic tanks installed on or after January 10, 1974 (if not exempt from SPCC regulation because subject to all of the technical requirements of 40 CFR part 280 or 281):		
	• Provide corrosion protection with coatings or cathodic protection compatible with local soil conditions	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	• Regular leak testing conducted	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(5)	The buried section of partially buried or bunkered metallic tanks protected from corrosion with coatings or cathodic protection compatible with local soil conditions	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
Comments:			

ATTACHMENT A		PLAN	FIELD
(6)	Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. Techniques include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other system of non-destructive testing	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	Appropriate qualifications for personnel performing tests and inspections are identified in the Plan and have been assessed in accordance with industry standards	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	• The frequency and type of testing and inspections are documented, are in accordance with industry standards and take into account the container size, configuration and design	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	• Comparison records of aboveground container integrity testing are maintained	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	• Container supports and foundations regularly inspected	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	• Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	• Records of all inspections and tests maintained[11]	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
Integrity Testing Standard identified in the Plan:			
112.12 (c)(6)(ii) *(Applies to AFVO Facilities only)*	Conduct formal visual inspection on a regular schedule for bulk storage containers that meet all of the following conditions: • Subject to 21 CFR part 110; • Elevated; • Constructed of austenitic stainless steel; • Have no external insulation; and • Shop-fabricated.	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas.	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	You must determine and document in the Plan the appropriate qualifications for personnel performing tests and inspections.[11]	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(10)	Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
112.8(d)/112.12(d)Facility transfer operations, pumping, and facility process			
(4)	Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly to assess their general condition	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	Integrity and leak testing conducted on buried piping at time of installation, modification, construction, relocation, or replacement	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
Comments:			

[11] Records of inspections and tests kept under usual and customary business practices will suffice

ATTACHMENT B ☐ NA **ONSHORE OIL PRODUCTION FACILITIES—40 CFR 112.9**		**PLAN**	**FIELD**
(Drilling and workover facilities are excluded from the requirements of §112.9) *Production facility* means all structures (including but not limited to wells, platforms, or storage facilities), piping (including but not limited to flowlines or intra-facility gathering lines), or equipment (including but not limited to workover equipment, separation equipment, or auxiliary non-transportation-related equipment) used in the production, extraction, recovery, lifting, stabilization, separation or treating of oil (including condensate), or associated storage or measurement, and is located in an oil or gas field, at a facility. This definition governs whether such structures, piping, or equipment are subject to a specific section of this part.			
112.9(b) Oil Production Facility Drainage			
(1)	At tank batteries, separation and treating areas where there is a reasonable possibility of a discharge as described in §112.1(b), drains for dikes or equivalent measures are closed and sealed except when draining uncontaminated rainwater. Accumulated oil on the rainwater is removed and then returned to storage or disposed of in accordance with legally approved methods	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	Prior to drainage, diked area inspected and action taken as provided below:		
	• 112.8(c)(3)(ii) - Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	• 112.8(c)(3)(iii) - Bypass valve opened and resealed under responsible supervision	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	• 112.8(c)(3)(iv) - Adequate records of drainage are kept; for example, records required under permits issued in accordance with §122.41(j)(2) and (m)(3)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(2)	Field drainage systems (e.g., drainage ditches or road ditches) and oil traps, sumps, or skimmers inspected at regularly scheduled intervals for oil, and accumulations of oil promptly removed	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
112.9(c) Oil Production Facility Bulk Storage Containers *Bulk storage container* means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.			
(1)	Containers materials and construction are compatible with material stored and conditions of storage such as pressure and temperature	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(2)	Except as allowed for flow-through process vessels in §112.9(c)(5) and produced water containers in §112.9(c)(6), secondary containment provided for all tank battery, separation and treating facilities sized to hold the capacity of largest single container and sufficient freeboard for precipitation.	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	Drainage from undiked area safely confined in a catchment basin or holding pond.	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(3)	Except as allowed for flow-through process vessels in §112.9(c)(5) and produced water containers in §112.9(c)(6), periodically and upon a regular schedule, visually inspect containers for deterioration and maintenance needs, including foundation and supports of each container on or above the surface of the ground	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(4)	New and old tank batteries engineered/updated in accordance with good engineering practices to prevent discharges including at least one of the following: • Adequate container capacity to prevent overfill if a pumper/gauger is delayed in making regularly scheduled rounds; • Overflow equalizing lines between containers so that a full container can overflow to an adjacent container; • Adequate vacuum protection to prevent container collapse; or • High level sensors to generate and transmit an alarm to the computer where the facility is subject to a computer production control system	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
Comments:			

ATTACHMENT B		PLAN	FIELD
(5)	**Flow-through Process Vessels.** Alternate requirements in lieu of sized secondary containment required in (c)(2) and requirements in (c)(3) above for facilities with flow-through process vessels:		
(i)	Flow-through process vessels and associated components (e.g. dump valves) are periodically and on a regular schedule visually inspected and/or tested for leaks, corrosion, or other conditions that could lead to a discharge as described in §112.1(b)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(ii)	Corrective actions or repairs have been made to flow-through process vessels and any associated components as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(iii)	Oil removed or other actions initiated to promptly stabilize and remediate any accumulation of oil discharges associated with the produced water container	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(iv)	All flow-through process vessels comply with §§112.9(c)(2) and (c)(3) within six months of any flow-through process vessel discharge of more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b) or discharges of more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b) within any twelve month period.[12]	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
112.9(d) Facility transfer operations, pumping, and facility process			
(1)	All aboveground valves and piping associated with transfer operations are inspected periodically and upon a regular schedule to determine their general condition. Include the general condition of flange joints, valve glands and bodies, drip pans, pipe supports, pumping well polish rod stuffing boxes, bleeder and gauge valves, and other such items	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(3)	If flowlines and intra-facility gathering lines are not provided with secondary containment in accordance with §112.7(c) and the facility is not required to submit an FRP under §112.20, then the SPCC Plan includes:		
(i)	• An oil spill contingency plan following the provisions of 40 CFR part 109[13]	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(ii)	• A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that might be harmful	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA

Comments:

[12] Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

[13] Note that the implementation of a 40 CFR part 109 plan does not require a PE impracticability determination for this specific requirement

ATTACHMENT B		PLAN	FIELD
(4)	A flowline/intra-facility gathering line maintenance program to prevent discharges is prepared and implemented and includes the following procedures:		
(i)	Flowlines and intra-facility gathering lines and associated valves and equipment are compatible with the type of production fluids, their potential corrosivity, volume, and pressure, and other conditions expected in the operational environment	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(ii)	Flowlines and intra-facility gathering lines and associated appurtenances are visually inspected and/or tested on a periodic and regular schedule for leaks, oil discharges, corrosion, or other conditions that could lead to a discharge as described in §112.1(b).	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	If flowlines and intra-facility gathering lines are not provided with secondary containment in accordance with §112.7(c), the frequency and type of testing allows for the implementation of a contingency plan as described under 40 CFR 109 or an FRP submitted under §112.20	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(iii)	Repairs or other corrective actions are made to any flowlines and intra-facility gathering lines and associated appurtenances as indicated by regularly scheduled visual inspections, tests, or evidence of a discharge	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(iv)	Oil removed or other actions initiated to promptly stabilize and remediate any accumulation of oil discharges associated with the produced water containers	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
ATTACHMENT B ☐ NA **ONSHORE OIL DRILLING AND WORKOVER FACILITIES—40 CFR 112.10**		**PLAN**	**FIELD**
112.10(b)	Mobile drilling or workover equipment is positioned or located to prevent a discharge as described in §112.1(b)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
112.10(c)	Catchment basins or diversion structures are provided to intercept and contain discharges of fuel, crude oil, or oily drilling fluids	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
112.10(d)	Blowout prevention (BOP) assembly and well control system installed before drilling below any casing string or during workover operations	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	BOP assembly and well control system is capable of controlling any well-head pressure that may be encountered while on the well	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA

Comments:

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ATTACHMENT C: SPCC FIELD INSPECTION AND PLAN REVIEW TABLE

Documentation of Field Observations for Containers and Associated Requirements

Inspectors should use this table to document observations of containers as needed.

Containers and Piping

Check containers for leaks, specifically looking for: drip marks, discoloration of tanks, puddles containing spilled or leaked material, corrosion, cracks, and localized dead vegetation, and standards/specifications of construction.

Check aboveground container foundation for: cracks, discoloration, and puddles containing spilled or leaked material, settling, gaps between container and foundation, and damage caused by vegetation roots.

Check all piping for: droplets of stored material, discoloration, corrosion, bowing of pipe between supports, evidence of stored material seepage from valves or seals, evidence of leaks, and localized dead vegetation. For all aboveground piping, include the general condition of flange joints, valve glands and bodies, drip pans, pipe supports, bleeder and gauge valves, and other such items (Document in comments section of §112.8(d) or 112.12(d).)

Secondary Containment (Active and Passive)

Check secondary containment for: containment system (including walls and floor) ability to contain oil such that oil will not escape the containment system before cleanup occurs, proper sizing, cracks, discoloration, presence of spilled or leaked material (standing liquid), erosion, corrosion, penetrations in the containment system, and valve conditions.

Check dike or berm systems for: level of precipitation in dike/available capacity, operational status of drainage valves (closed), dike or berm impermeability, debris, erosion, impermeability of the earthen floor/walls of diked area, and location/status of pipes, inlets, drainage around and beneath containers, presence of oil discharges within diked areas.

Check drainage systems for: an accumulation of oil that may have resulted from any small discharge, including field drainage systems (such as drainage ditches or road ditches), and oil traps, sumps, or skimmers. Ensure any accumulations of oil have been promptly removed.

Check retention and drainage ponds for: erosion, available capacity, presence of spilled or leaked material, debris, and stressed vegetation.

Check active measures (countermeasures) for: amount indicated in plan is available and appropriate; deployment procedures are realistic; material is located so that they are readily available; efficacy of discharge detection; availability of personnel and training, appropriateness of measures to prevent a discharge as described in §112.1(b). *Note that appropriate evaluation and consideration must be given to the any use of active measures at an unmanned production facility.*

Container ID/ General Condition[14] Aboveground or Buried Tank	Storage Capacity and Type of Oil	Type of Containment/ Drainage Control	Overfill Protection and Testing & Inspections

[14] Identify each tank with either an A to indicate aboveground or B for completely buried

ATTACHMENT C: SPCC FIELD INSPECTION AND PLAN REVIEW TABLE (CONT.)

Documentation of Field Observations for Containers and Associated Requirements

Container ID/ General Condition[15] Aboveground or Buried Tank	Storage Capacity and Type of Oil	Type of Containment/ Drainage Control	Overfill Protection and Testing & Inspections

[15] Identify each tank with either an A to indicate aboveground or B for completely buried

ATTACHMENT D: SPCC INSPECTION AND TESTING CHECKLIST

Required Documentation of Tests and Inspections

Records of inspections and tests required by 40 CFR part 112 signed by the appropriate supervisor or inspector must be kept by all facilities with the SPCC Plan for a period of three years. Records of inspections and tests conducted under usual and customary business practices will suffice. Documentation of the following inspections and tests should be kept with the SPCC Plan.

	Inspection or Test	Documentation		Not Applicable
		Present	Not Present	
112.6—Tier I Qualified Facilities				
(a)(3)(iii)	Regular testing of system or documented procedures used instead of liquid level sensing devices specified in §§112.8(c)(8) and 112.12(c)(8) to prevent container overfills	☐	☐	☐
112.7–General SPCC Requirements				
k(2)(i)	Inspection or monitoring of qualified oil-filled operational equipment when the equipment meets the qualification criteria in §112.7(k)(1) and facility owner/operator chooses to implement the alternative requirements in §112.7(k)(2) that include an inspection or monitoring program to detect oil-filled operational equipment failure and discharges	☐	☐	☐
112.8/112.12–Onshore Facilities (excluding oil production facilities)				☐ NA
(b)(1), (b)(2)	Inspection of storm water released from diked areas into facility drainage directly to a watercourse	☐	☐	☐
(c)(3)	Inspection of rainwater released directly from diked containment areas to a storm drain or open watercourse before release, open and release bypass valve under supervision, and records of drainage events	☐	☐	☐
(c)(4)	Regular leak testing of completely buried metallic storage tanks installed on or after January 10, 1974 and regulated under 40 CFR 112	☐	☐	☐
(c)(6)	Regular integrity testing of aboveground containers and integrity testing after material repairs, including comparison records	☐	☐	☐
(c)(6), (c)(10)	Regular visual inspections of the outsides of aboveground containers, supports and foundations	☐	☐	☐
(c)(6)	Frequent inspections of diked areas for accumulations of oil	☐	☐	☐
(d)(4)	Regular inspections of aboveground valves, piping and appurtenances and assessments of the general condition of flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces	☐	☐	☐
(d)(4)	Integrity and leak testing of buried piping at time of installation, modification, construction, relocation or replacement	☐	☐	☐
112.9–Onshore Oil Production Facilities (excluding drilling and workover facilities)				☐ NA
(b)(1)	Rainwater released directly from diked containment areas inspected following §§112.8(c)(3)(ii), (iii) and (iv), including records of drainage kept	☐	☐	☐
(b)(2)	Field drainage systems, oil traps, sumps, and skimmers inspected regularly for oil, and accumulations of oil promptly removed	☐	☐	☐
(c)(3)	Containers, foundations and supports inspected visually for deterioration and maintenance needs	☐	☐	☐
(c)(5)(i)	In lieu of having sized secondary containment, flow-through process vessels and associated components visually inspected and/or tested periodically and on a regular schedule for conditions that could result in a discharge as described in §112.1(b)	☐	☐	☐
(d)(1)	All aboveground valves and piping associated with transfers are regularly inspected	☐	☐	☐
(d)(4)(ii)	For flowlines and intra-facility gathering lines without secondary containment, in accordance with §112.7(c), lines are visually inspected and/or tested periodically and on a regular schedule to allow implementing the part 109 contingency plan or the FRP submitted under §112.20	☐	☐	☐

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ATTACHMENT E: SPCC CONTINGENCY PLAN REVIEW CHECKLIST

☐ NA

40 CFR Part 109–Criteria for State, Local and Regional Oil Removal Contingency Plans

If SPCC Plan includes an impracticability determination for secondary containment in accordance with §112.7(d), the facility owner/operator is required to provide an oil spill contingency plan following 40 CFR part 109, unless he or she has submitted a FRP under §112.20. An oil spill contingency plan may also be developed, unless the facility owner/operator has submitted a FRP under §112.20 as one of the required alternatives to general secondary containment for qualified oil filled operational equipment in accordance with §112.7(k).

	109.5–Development and implementation criteria for State, local and regional oil removal contingency plans[16]	**Yes**	**No**
(a)	Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.	☐	☐
(b)	Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:	☐	☐
(1)	The identification of critical water use areas to facilitate the reporting of and response to oil discharges.	☐	☐
(2)	A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.	☐	☐
(3)	Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., National Contingency Plan (NCP)).	☐	☐
(4)	An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.	☐	☐
(c)	Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:	☐	☐
(1)	The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.	☐	☐
(2)	An estimate of the equipment, materials and supplies that would be required to remove the maximum oil discharge to be anticipated.	☐	☐
(3)	Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.	☐	☐
(d)	Provisions for well-defined and specific actions to be taken after discovery and notification of an oil discharge including:	☐	☐
(1)	Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.	☐	☐
(2)	Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.	☐	☐
(3)	A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.	☐	☐
(4)	Provisions for varying degrees of response effort depending on the severity of the oil discharge.	☐	☐
(5)	Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.	☐	☐
(e)	Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.	☐	☐

[16] The contingency plan should be consistent with all applicable state and local plans, Area Contingency Plans, and the NCP.

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ATTACHMENT F: ADDITIONAL COMMENTS

ATTACHMENT F: ADDITIONAL COMMENTS (CONT.)

ATTACHMENT G: PHOTO DOCUMENTATION NOTES

Photo#	Photographer Name	Time of Photo Taken	Compass Direction	Description

ATTACHMENT G: PHOTO DOCUMENTATION NOTES (CONT.)

Photo#	Photographer Name	Time of Photo Taken	Compass Direction	Description