

CBS Corporate Safety and Environmental Affairs

CBS Corporation, 20 Stanwix Street,
Pittsburgh, PA 15222

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Aboveground and Underground Storage Tanks

There are approximately 144 diesel/oil storage tanks throughout CBS, most of which are aboveground. If your facility has an emergency generator, then you most likely have one of these tanks. Both aboveground and underground tanks are regulated by federal, state, and local laws.

The Federal Spill Prevention Control and Countermeasures (SPCC) regulations govern storage tanks if the following conditions are met:

- The location has a combined total capacity of 1,320 gallons or more of oil in all of the drums and tanks onsite, and
- The tank has the potential to discharge harmful quantities of oil into a waterway or shoreline.

If your facility meets the above conditions, you are required to have an SPCC Plan. The purpose of the Plan is to provide procedures for monitoring your containers and tanks and to have a coordinated response effort to spills, releases, or accidental discharges of oil or other hazardous materials. The Plan should also include methods by which these spills, releases, or accidental discharges will be reported to local, state, and federal agencies having regulatory responsibility.

SPCC regulations reduce the impact from spills by requiring:

- A plan of response in the event of a spill at a site
- Secondary containment for containers and tanks
- Resources to address a potential spill
- Monthly monitoring and inspections
- Training on monitoring, inspection, spill response, and handling of oil

If you are required to have an SPCC Plan, you are also required to file Tier II Community Right-to-Know information with your local Fire Department and state emergency management agency, as mentioned in last month's newsletter.

Potential storage tank compliance issues at CBS include the following:

- Failure to re-register or pay renewal fees
- Failure to perform inspections
- Lack of training and documentation of training

Please contact Peter von Schondorf at pvonschondorf@leaderlink.com if you need assistance with any of the above-listed compliance issues or have any questions.

Tank Inventory

We would like to thank all of you who participated in our recent efforts to update the Tank Inventory list.

The information contained in the list – location, installation date, tank capacity and contents, etc. – is used to prepare the Financial Responsibility Certificates of Insurance.

These certificates are required by the regulatory agency to ensure that owners and operators of underground storage tanks have the financial resources to clean up a site if a release occurs and to compensate third parties for injury to their property or themselves.

The 2015 certificates have been sent to members of the Environmental, Health, and Safety Council for distribution within their respective business units.

Please continue to send updated information on new and existing tanks to Peter von Schondorf at pvonschondorf@leaderlink.com