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Standard Guide for Security of Tank Farm Installations for Compliance with Spill Prevention, Control and Countermeasure Plan (SPCC) Regulations¹

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INTRODUCTION

Federal Regulation 40 CFR 112.3 requires an owner or operator of certain onshore or offshore facilities that have tanks used for storing oil to prepare a written Spill Prevention Control and Countermeasure Plan (SPCC Plan). The SPCC Plan must include a description of the security measures that are implemented at the facility to prevent unauthorized access to oil handling, processing, and storage areas. Such security measures may involve fencing, lighting and other more sophisticated systems.

The SPCC rule defines Tier I and Tier II facilities. The owner/operator of Tier I and certain Tier II facilities may prepare and self-certify the SPCC Plan. Refer to United States Environmental Protection Agency - Office of Solid Waste and Emergency Response Spill Prevention, Control and Countermeasure (SPCC) Rule - Stream-lined Requirements for Tier I and Tier II Qualified Facilities for aid in determining if a particular facility is a qualified Tier I or Tier II facility. If the requirements for self-certification are not met then the SPCC Plan must be certified by a Professional Engineer (P.E.) Some states do not permit self-certification of SPCC Plans and thus requires that all SPCC Plans be certified by a Professional Engineer (P.E.) The owner/operator should check with the state engineering licensing board to find out if it prohibits SPCC Plan self-certification.

1. Scope

1.1 This guide covers fencing and lighting only. More sophisticated security systems may be appropriate for the facility but discussion of these types of systems is beyond the scope of this document.

1.2 The information included in this guide is intended for petroleum bulk storage facilities. It is not intended for use with retail fueling and other motor fueling facilities, refineries, chemical plants, docks, oil production facilities, or electric power generation, transmission, distribution and service center facilities. Fencing, lighting or other security measures designed to prevent unauthorized access to the bulk storage facility may be components of Best Management Practices (BMPs) that the facility uses to prevent releases of petroleum to storm water discharges. There are several different types of fencing and lighting that can be effective. The intent of this document is to outline a method for providing security fencing and lighting

that has been effectively used. There are other fencing and lighting methods that may be adequately effective. Some facilities may be considered adequately secure without fencing or lighting. An analysis of the threat level should be made to determine the type of security system to employ.

1.3 Any facilities must meet local, state, and federal building, architectural, hazardous material handling and storage, and fire protection codes.

1.4 The values stated in inch-pound units are to be regarded as standard. No other units of measurement are included in this standard.

2. Referenced Documents

2.1 *ASTM Standards*:²

[A121 Specification for Metallic-Coated Carbon Steel Barbed Wire](#)

[A123 Specification for Zinc \(Hot-Dip Galvanized\) Coatings on Iron and Steel Products](#)

¹ This test method is under the jurisdiction of ASTM Committee E50 on Environmental Assessment, Risk Management and Corrective Action and is the direct responsibility of Subcommittee E50.01 on Storage Tanks.

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² For referenced ASTM standards, visit the ASTM website, www.astm.org, or contact ASTM Customer Service at service@astm.org. For *Annual Book of ASTM Standards* volume information, refer to the standard's Document Summary page on the ASTM website.

[A392 Specification for Zinc-Coated Steel Chain-Link Fence Fabric](#)

[A567/A567M Specification for Castings, Iron, Cobalt, and Nickel-Base Alloy, for High Strength at Elevated Temperatures \(Withdrawn 1987\)³](#)

[A817 Specification for Metallic-Coated Steel Wire for Chain-Link Fence Fabric and Marcellled Tension Wire](#)

[F626 Specification for Fence Fittings](#)

[F900 Specification for Industrial and Commercial Steel Swing Gates](#)

[F1043 Specification for Strength and Protective Coatings on Steel Industrial Fence Framework](#)

[F1083 Specification for Pipe, Steel, Hot-Dipped Zinc-Coated \(Galvanized\) Welded, for Fence Structures](#)

[F1184 Specification for Industrial and Commercial Horizontal Slide Gates](#)

2.2 *Chain Link Fence Manufacturers Institute:*⁴

[CLF –SFR0111 Security Fencing Recommendations The Tested and Proven Performance of Security Grade Chain Link Fencing Systems](#)

[CLF-WLG 0110 Chain Link Fence Wind Load Guide for Selection of Line Post and Line Post Spacing](#)

[CLF-PM0610 Product Manual](#)

2.3 *United States Department of Transportation:*⁵

[AC150/5370 – 10F](#)

[Item F-161 – Wire fence With Steel Posts \(Class C and D Fence\)](#)

[Item F-162 – Chain Link Fence Item](#)

[F-163 – Wildlife Deterrent Fence](#)

2.4 *United States Environmental Protection Agency:*

[Federal Regulation 40 CFR 112 Oil Prevention Pollution Office of Solid Waste and Emergency Response – Spill Prevention, Control, and Countermeasure \(SPCC\) Rule – Streamlined Requirements for Tier I and Tier II Qualified Facilities](#)

2.5 *Federal Standards:*⁶

[Federal Specification RR-F-191K/GEN Fencing, Wire and Post Metal \(And Gates, Chain Link Fence Fabric, and Accessories-\(General Specification\)](#)

[RR-F-191/1 –Fencing, Wire and Post, Metal \(Chain-Link Fence Fabric\)](#)

[RR-F-191/2 Fencing, Wire and Post, Metal \(Chain- Link Fence Gates\)](#)

[RR-F-191/3 Fencing, Wire and Post, Metal \(Chain-Link Fence Posts, Top Rails, and Braces\)](#)

[RR-F-191/4 –Fencing, Wire and Post, Metal \(Chain-Link Fence Accessories\)](#)

2.6 *Lighting:*

[NFPA 70 National Electric Code – Introduction, Chapter 1, Chapter 2, Chapter 3, Chapter 4, Article 410 –](#)

[International Building Code Section 1205](#)

[Illumination Society of North America](#)

[United States Environmental Protection Agency 40 FR 112 Oil Pollution Prevention](#)

3. Terminology

3.1 *Definitions:*

3.1.1 *foot candle*—is a non-SI unit of illuminance or light intensity, abbreviated fc, lm/ft², ft-c.

3.1.1.1 *Discussion*—The SI unit is lux. One foot candle is approximately equal to 10.764 lux.

4. Threat Level

4.1 The first step is for the owner to investigate and determine the perceived threat level. From that determination a judgment on the type and extent of fencing and the type and extent of lighting can be made. Helpful references are detailed in Section 2 above. Contacting the Department of Homeland Security (DHS) to obtain a security analysis and a vulnerability study may be helpful. Further contacting the local police department or sheriff for guidance on security strategies in the local area based on familiarity with the threat characteristics of the area will be helpful.

5. Fencing Systems

5.1 The reference documents describe fencing systems that are more secure and fencing systems that are less secure. The owner should perform a risk analysis and determine the appropriate fencing system for the facilities to be protected.

NOTE 1—Some fence types may be restricted by local codes.

6. Fencing Details

6.1 A chain-link fence is one type of fencing that has been used successfully with the type of facilities described in 1.2. There are other fencing details that will provide adequate security Refer to [Appendix X1](#) for typical chain-link fence details.

7. Illumination

7.1 The illumination values included in [Appendix X2](#) have been used successfully for these types of facilities. The owner should determine if other illumination values are better suited to the facilities involved.

7.2 Facilities should be equipped with lights to prevent acts of vandalism and to allow facility personnel to discover discharges that occur at night.

NOTE 2—Lighting may not be helpful for security where a perpetrator has no fear of being caught and there are no patrols or other surveillance.

7.3 The lighting system used to provide the required illumination levels should be designed to provide the average illumination when the lighting is in operation.

8. Keywords

8.1 fencing; lighting; SPCC plan; tank farm security; tank farm security fencing; tank farm security lighting

³ The last approved version of this historical standard is referenced on www.astm.org.

⁴ Chain Link Fence Manufacturers Institute (CLFMI) 10015 Old Columbia Rd. Suite B215 Columbia, MD 21046. <http://www.chainlinkinfo.org>

⁵ United States Department of Transportation, 1200 New Jersey Avenue, SE Washington, DC 20590 855-368-4200, <https://www.transportation.gov>

⁶ DLA Document Services Building 4/D 700 Robbins Avenue Philadelphia, PA 19111-5094 <http://quicksearch.dla.mil/>