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Environmental Health and Safety (EHS) Policy

Spill Prevention Control and Countermeasures (SPCC)

Regulatory Reference: 40 CFR 112, Oil Pollution Prevention.

Purpose: The purpose of this Spill Prevention Control and Countermeasures (SPCC) Program is to establish a framework for each Fixed Base Operation (FBO) to become and remain compliant with the Federal Environmental Protection Agency (EPA) rules for above ground tank systems (ASTs) and oil pollution prevention.

Each facility that owns or operates above ground tank systems (including refueler trucks) that contain an aggregate storage capacity of 1,320 gallons or higher must prepare a SPCC Plan. The plan includes requirements for secondary containment, loading/unloading of fuel and oil, discharge of accumulated rainwater, inspections, training, updates to the plan, and other miscellaneous items.

General Requirements:

The purpose of the SPCC Rule is to prevent spills of fuel and oil into the navigable waters of the United States. The regulations are in place to encourage facilities to build structures and perform actions that will prevent spills from occurring. If a spill occurs, systems are required to contain the spill such as secondary containment systems and thus prevent potential spills from advancing into the navigable waters. Finally, if a spill does advance off-site, the SPCC Plan includes procedures for making the initial response to a spill and to provide proper reporting to the regulatory agencies.

Each facility is required to prepare a site specific SPCC Plan. This EHS Policy provides the general framework and guidance for following the SPCC requirements, but each facility must follow the specific requirements set forth in the site specific SPCC Plan. If there are any discrepancies between this EHS Policy and the site specific SPCC Plan, the SPCC Plan shall prevail.

The site specific SPCC Plan must include the following requirements.

- Properly transferring fuel.
- Properly transferring accumulated rain water from containment areas.
- Performing training.
- Conducting routine inspections.
- Properly responding if a spill should occur.

Spill Reporting Requirements:

A spill of fuel or oil must be reported to the EPA and the state if 25 gallons of fuel or oil is spilled on the soil (quantities may be less in some states) or if any fuel or oil gets into the storm sewer system and creates a sheen on the water. Contact information for reporting is located in the site specific SPCC Plan. A person reporting a spill should be prepared to provide the following information.

- Date, time, and duration of the release.
- Source and total volume of the release.
- Spill clean-up procedures.
- Personnel who discovered and/or participated in the spill clean-up.
- Equipment used during the clean-up.
- Waste disposal methods.
- Any unusual events, injuries or agency inspections.

In addition to this reporting, a written report is required by the EPA if either of the following quantities is spilled. Written report requirements are included in the site specific SPCC Plan.

- Any single discharge more than 1,000 gallons.
- Any two discharges more than 42 gallons each within a 12-month period.

Spills must be reported to the EHS/Safety Department.

Responsibilities:

1. Employees:

Employees are required to perform routine work activities in an environmentally responsible manner. Sensitive activities include the following fuel transfers.

- From the fuel delivery company into the bulk fuel tanks.
- From the bulk fuel tank into the refueler truck.
- From the refueler truck into the aircraft.
- Transfers of used oil and used fuel.

Employees commonly make transfers of accumulated rain water from containment areas. When these transfers are made, a notation must be made in the facility log book documenting the estimated amount of water released, the date, the time, a statement that the water contained no fuel (even a sheen), and a statement that the valve was closed and secured after the transfer.

Employees should know where potential spills will flow. This can be accomplished by watching the flow of rain water during a rain event. Employees should know where to build dams with booms or absorbent materials if a spill occurs. Employees must know where spill equipment is kept and how to properly employ the spill equipment.

Employees are required to make an initial response to a spill if it occurs, however, formal clean-up activities are to be performed by trained and certified response contractors. Employees should make an effort to stop the flow of fuel (close valve, shut down pump, etc.) and should employ booms or absorbent materials to prevent a spill from advancing into storm sewer inlets or drainage ditches. Employees should notify supervision of any spill, regardless of size, and allow supervision to make appropriate reports to the regulatory agencies. Proper clean-up of absorbent materials must be included in the employee activities.

All employees that handle fuel or oil must participate in initial and annual training to refresh their understanding of the EPA rules and the SPCC Plan. The training must include the items shown in the General Requirements section of this Policy.

Employees often perform routine monthly inspections of the fuel handling equipment and spill response equipment. Inspections must follow the checklist provided in the site specific SPCC Plan and be kept with the SPCC Plan once complete. Any malfunctioning equipment or missing spill equipment should be reported to supervision immediately.

2. Managers/Supervisors:

Managers/Supervisors should ensure that employees are performing their work activities in a proper manner including fuel transfers and transfers of accumulated rain water.

Managers/Supervisors should ensure that employees respond appropriately to spills. Managers/Supervisors should make notifications to Federal, State, and Local environmental regulatory agencies in event of a spill as required by the site specific SPCC Plan. Managers/Supervisors should coordinate activities of environmental response contractors that may be assisting in the clean-up activities after a spill.

Managers/Supervisors should ensure employees participate in the required training and perform inspections.

Managers/Supervisors should ensure the SPCC Plan is up-to-date and sign off for the 5-year reviews if no significant changes have occurred at the facility. Managers/Supervisors should also ensure that a professional engineer be contracted to modify the SPCC Plan within 6 months of any significant change occurring such as adding new tanks or new refueler trucks. Managers/Supervisors should make the SPCC Plan available to regulatory agencies during an inspection of the facility.

3. EHS/Safety Department:

The Environmental Health and Safety (EHS) Department/Safety Department is responsible for ensuring that each facility has a current SPCC Plan. EHS can assist FBOs in locating professional engineers (as required by the regulation) that can assist in creating or modifying SPCC Plans as needed.

EHS will assist FBOs in setting up initial “train the trainer” sessions and can assist in any environmental questions that may arise.

EHS must be notified of any reportable spill event and will properly document in the company tracking system.

Training:

The site specific SPCC Plan must include initial and annual training requirements for all employees that handle fuel or oil. EHS has provided a training video and Power Point slides to each FBO to be used for training. Training activities must include the following items.

- General facility operations.
- Procedures for oil handling.
- Operation and maintenance of equipment used to prevent discharges.
- Requirements for reporting a discharge.
- Pollution control laws, rules and regulations.
- Contents of the facility SPCC Plan.
- Discussion of previous discharges, malfunctioning components, and new precautions.

Recordkeeping:

Documentation of the following SPCC activities must be maintained.

- Transfers of accumulated rain water must be documented in the facility log book or documented on a checklist. These documents must be maintained for a period of three (3) years.
- Facility inspections must follow the checklist provided in the site specific SPCC Plan and should be maintained for a period of three (3) years.
- Training records must document who received SPCC training, the dates of the training, and the topics covered. These documents must be maintained for a period of three (3) years.