

1.1 PURPOSE

- 1.1.1 The purpose of this policy is to protect and safeguard the environment during operations. This program is designed to set guidelines and principles for TERRY R PITT CONSTRUCTION employees as per the Oil Pollution Act in order to prevent releases to contact soil or navigable water (including sewer systems) and provide necessary environmental protection.

1.2 RESPONSIBILITIES

- 1.2.1 The safety manager will maintain and modify the SPCC policy as necessary. The safety manager will amend the SPCC policy whenever there is a change in facility design, construction, operation, or maintenance that materially affects any TERRY R PITT CONSTRUCTION facility's spill potential.
- 1.2.2 The safety manager will respond to a reported incident in a timely manner and respond with appropriate action to control and remedy the incident. The safety manager will document the spill by means of an incident investigation.
- 1.2.3 The safety manager will provide oil spill kits as required by the SPCC policy and check oil spill kit inventory on a semi-annual basis and restock kits as necessary.
- 1.2.4 The site supervisor will ensure the operator performs inspections of tanks and that bulk storage containers as defined by EPA undergo tank integrity testing (often referred to as thickness testing) every five years.
- 1.2.5 The site supervisor will notify the safety manager of a spill or release and aid in the evaluation and determination on whether TERRY R PITT CONSTRUCTION can clean the spill. If so, the site supervisor will coordinate cleanup efforts according to procedure.
- 1.2.6 Employees must maintain a clean work area and use good housekeeping best management practices in areas where chemicals may be used or stored. This includes, but is not limited to, clean and organized storage, labeling, and secondary containment where necessary.

1.3 SPILL PREVENTION

- 1.3.1 In order to prevent or minimize the potential of spills and damage to the environment, TERRY R PITT CONSTRUCTION will:
- 1.3.1.1 Comply with state, federal, and local rules and regulations.
 - 1.3.1.2 Conduct operations in a manner that demonstrates respect of the environment.
 - 1.3.1.3 Provide training, emphasizing to employees that protecting the environment is a vital requirement of every job.
 - 1.3.1.4 Respond quickly and effectively to environmental issues.
 - 1.3.1.5 Maintain an effective environmental spill prevention program.

- 1.3.1.6 Enforce the rules and regulations with an effective disciplinary action policy.
- 1.3.2 Safe chemical handling requires routine inspection of chemical storage areas and maintaining inventory control. A material inventory identifying hazardous substances and toxic chemicals will be part of the risk identification and is needed to determine the potential for spills.
- 1.3.3 Chemical hazards may be reduced by minimizing the amount of chemicals inventoried.
- 1.3.4 Other methods to reduce the potential of chemical spills include:
 - 1.3.4.1 Chemicals stored in the proper container and kept closed to minimize the potential for spillage, overflow, accumulation of rain, or exposure to storm water.
 - 1.3.4.2 Properly segregating chemicals to minimize the potential for a chemical reaction if a spill occurs.
 - 1.3.4.3 Properly labeling all containers for easy identification.
 - 1.3.4.4 Not overloading shelves.
 - 1.3.4.5 Avoiding storing chemicals on the floor or path where they may be struck by vehicles or powered industrial trucks.
 - 1.3.4.6 Storing cylinders with the protective cap in place and in the upright position.
 - 1.3.4.7 Ensuring good housekeeping practices in areas where chemicals are stored so that spills and damaged containers can be readily identified.
 - 1.3.4.8 Periodically inspecting chemical storage areas for damaged containers and chemicals that are past their expiration date.
 - 1.3.4.9 In areas where spills are likely to occur, secondary containment systems will be used to ensure that spills do not migrate to areas that may affect the environment.
 - 1.3.4.10 Purchasing only the amount of chemicals that are necessary in order to limit the amount of chemical inventory.
 - 1.3.4.11 Handling chemicals safely and with care.

1.4 NOTIFICATION PROCEDURES

- 1.4.1 Communication procedures should be based on type and quantity of materials spilled.
- 1.4.2 Contact an operator representative immediately upon discovery of a spill into the environment.
- 1.4.3 The work crew's immediate supervisor must be contacted after initial notification to operator.

- 1.4.4 TERRY R PITT CONSTRUCTION's safety manager and operations manager will be notified.
- 1.4.5 Upon the safety manager gathering information pertaining to the incident, the operator representative will have full authority to implement and manage emergency response.

1.5 SPILL RESPONSE PROCEDURES

- 1.5.1 Spills or releases must be reported immediately to a supervisor and handled in accordance with TERRY R PITT CONSTRUCTION spill response protocol.
- 1.5.2 The operator representative, site supervisor, and safety manager will determine if governmental agency notification is necessary. The operator will determine if the spill can be cleaned by TERRY R PITT CONSTRUCTION or if additional resources are required. If environmental authorities need to be contacted, TERRY R PITT CONSTRUCTION will report the type of chemical spilled and the quantity when required to do so by regulatory or statutory requirements.
- 1.5.3 The safety manager will document the spill by means of an incident investigation and collect the following information pertaining to the incident:
 - 1.5.3.1 Name of the facility and the owner or operator of the facility
 - 1.5.3.2 Name of the individual submitting the information
 - 1.5.3.3 Location of the facility
 - 1.5.3.4 Maximum storage handling capacity of the facility and normal daily throughout
 - 1.5.3.5 The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements
 - 1.5.3.6 Description of the facility including maps, flow diagrams, and a topographical map
 - 1.5.3.7 The cause(s) of such spill(s), including a failure analysis of the system or subsystem in which failure occurred
 - 1.5.3.8 Additional preventive measures taken or contemplated in order to minimize the possibility of recurrence
 - 1.5.3.9 Date and year of initial facility operation
 - 1.5.3.10 A complete copy of the SPCC plan with any amendments
- 1.5.4 TERRY R PITT CONSTRUCTION will oversee the cleanup of the spill where warranted. It is the responsibility of TERRY R PITT CONSTRUCTION to provide spill cleanup supplies and perform cleanup activities. Oil contaminated debris must be disposed of in accordance with applicable disposal regulations and TERRY R PITT CONSTRUCTION's used oil waste management requirements.
- 1.5.5 In the event of a large release, the facility responsible person will report the spill to 9-1-1 or the National Response Center at 800-424-8802.

Spill Prevention and Response (SPCC)

- 1.5.6 Personnel in the close vicinity of the spill who will not assist in the cleanup process should immediately evacuate the area.
- 1.5.7 TERRY R PITT CONSTRUCTION workers will be informed of the following information because of its importance to successful implementation of emergency procedures:
 - 1.5.7.1 Escape routes from the facility or site location
 - 1.5.7.2 Location of communication devices and available telephones to use for alerting all personnel and to mobilize outside fire protection or other emergency personnel.
 - 1.5.7.3 All personnel will be trained in emergency evacuation procedures by means of fire drills, safety meetings, and in-house fire response discussions and training.
 - 1.5.7.4 Alternative means of escape if primary escape route is blocked by the emergency.
- 1.5.8 The regular evacuation route will be used if there is a spill. Workers will not take refuge inside a building unless emergency circumstances absolutely prevent escape via the main exit.
 - 1.5.8.1 Individuals designated to remain to control critical operations should clearly understand that they are to remain for active emergency purposes and not for refuge in a location presumed to be safe.

1.6 CLEANUP PROCEDURES

- 1.6.1 Spills should be cleaned as quickly and effectively as possible without jeopardizing employee safety. Employees should cleanup spills themselves only if they are properly trained and protected.
- 1.6.2 Spill control equipment should be used to properly cleanup spills.
- 1.6.3 Follow the SDS for proper protection of employees and the correct method of spill cleanup.
- 1.6.4 Damaged containers should be immediately repaired, up-righted, or over-packed.
- 1.6.5 Containment must be established especially if any drains, streams, or other water supplies are in close proximity so that runoff cannot reach them.
- 1.6.6 If an employee feels unsure about any chemical cleanup they should immediately evacuate the area and alert a supervisor to obtain additional resources.
- 1.6.7 TERRY R PITT CONSTRUCTION will transport oil-dry materials from nearest spill kit location to the spill.
- 1.6.8 An oil-dry dike will be constructed around the spill, beginning in the direction of any oil flow.
- 1.6.9 Oil-dry will be applied to the surface of the spill area to absorb the spilled material.
- 1.6.10 Once the spill has been contained and all free oil has been absorbed/removed using absorbent pads and pillows, place all materials into a garbage bag or other sealable container. The drums will be labeled, dated, and disposed of or recycled through an approved contractor.

1.7 SPILL KITS

- 1.7.1 Proper materials will be provided for employees to properly cleanup small spills and releases.
- 1.7.2 Kits must contain materials to properly cleanup all types of materials that are expected to be cleaned.
- 1.7.3 Kits must be labeled and stored in easily accessible area close to the chemical storage area.
- 1.7.4 Kits must be periodically inventoried to be certain that all the necessary items are available.
- 1.7.5 Any missing material should be replaced immediately.

1.8 TRAINING

- 1.8.1 All chemical handling workers will be properly instructed in the operation and maintenance of equipment to prevent the discharge. Supervisors will observe the performance of all employees and advise them of appropriate operational and maintenance procedures when required.
- 1.8.2 To ensure the proper cleanup and disposal of chemical spills, employees will receive proper training. Training for spill cleanup will include:
 - 1.8.2.1 Hazard communication training
 - 1.8.2.2 Materials available for use
 - 1.8.2.3 Location of SDSs
 - 1.8.2.4 Location of spill kits
 - 1.8.2.5 Proper spill cleanup for chemicals at the facility
 - 1.8.2.6 HAZWOPER awareness training
 - 1.8.2.7 The spill prevention policy
 - 1.8.2.8 Communication procedures
 - 1.8.2.9 Proper waste disposal

