1 Status

1.1 New policy 07/01/11, compilation of existing requirements.

2 Purpose

2.1 To provide spill prevention and response information to allow sites to minimize the potential for spills.

3 Applicability

3.1 This policy applies to all subsidiary companies and departments of The Cianbro Companies.

3.2 All organizations are required to comply with the provisions of this policy and procedure. Any deviation, unless spelled out specifically in the policy, requires the permission of the Corporate Safety Officer or designee.

4 Definitions

4.1 Tier 1 Facility - A qualified Tier 1 Facility meets the following criteria:
   A. The aggregate aboveground oil storage capacity of the facility is 10,000 U.S. gallons or less; and
   B. The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part 112 if the facility has been in operation for less than three years (not including oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism); and
   C. There is no individual oil storage container at the facility with an aboveground capacity greater than 5,000 U.S. gallons.

4.2 SPCC - Means a Spill Prevention, Control, and Countermeasure Plan. All sites that store 1320 gallons of fuels and oils in containers 55 gallons or larger are required to develop a formal SPCC plan that meets the requirements contained in 40 CFR part 112, the Oil Pollution Prevention; Spill Prevention, Control, and Countermeasure (SPCC) Rule

5 Policy

5.1 All Cianbro sites storing and/or using fuels, oils or other materials with the potential for spills will have a written site specific spill prevention and response plan at a minimum.

6 Responsibilities

6.1 The top Cianbro manager on the job site is responsible for the implementation of this policy on the project.

6.2 The corporate safety department is responsible for maintaining this document.
7 Spill Prevention and Response

7.1 Planning for Spill Prevention and Response
Cianbro sites storing and/or using fuels, oils or other materials are required to have a site specific spill prevention and response plan. The plan will focus on how to prevent spills and how to minimize the impact of spills if they occur. It will also identify when it is appropriate for the site to handle the spill and when it requires an outside emergency response team.

7.1.1 Identify the Potential Spills
- Identify what chemicals, oils (biodegradable oils included), fuels, etc. could be spilled on your site. Identify the most likely spills as well as the worst case spills. Identify if an SPCC plan will be necessary (Refer to Section 7.5).

7.1.2 Create a Plan
- Include notification procedures, who to notify, how quickly, specific phone numbers to use, etc.
- Include specific actions and steps for team members to take when they encounter a spill
- DO NOT try to stop or contain a spill if you are unsure whether you can perform the action safely.

7.2 Training

7.2.1 All team members on site will be trained in the contents of the site specific spill prevention and response plan during their mandatory initial site orientation and periodically throughout the duration of the job. Topics must include:
- How to get help if a spill is encountered
- Size of the spill they can clean up under this plan
- When to try to prevent the spill from reaching water or to stop the spill versus calling for help
- The contents of the site specific plan
- Location of spill cleanup materials and PPE
- Waste storage and disposal

7.2.2 This training does not qualify team members to provide emergency response to spills or threats of spills. It only allows team members to respond to incidental releases of hazardous substances on their site which do not pose a significant safety or health hazard to team members in the immediate vicinity or to the team member cleaning it up. These incidental spills may be cleaned up by team members who are familiar with the hazards of the chemicals with which they are working. For all other spills, contact an emergency response company. Refer the Cianbro Hazardous Waste/Hazardous Materials Handbook for the company Cianbro currently uses.

7.3 Spill Prevention

7.3.1 Identify potential spill locations or operations
- What chemicals, systems, vehicles and other sources of potential releases are present?
- What operations could result in a spill?
- Where are spills most likely to occur?
- What chemicals are present and in what quantities?
7.3.2 For each potential spill operation or location, identify mitigating actions to prevent or minimize the impact of a spill
- Identify where to park vehicles
- Use containment underneath equipment
- Identify where to locate fuel tanks, hydraulic power packs, and any material or piece of equipment with the potential to contribute to a significant spill so it could not get to water
- Identify how to prevent spills on barges from reaching the water
- Keep materials covered and containers securely closed
- Put catch/drip pans under pipe threading machines, at fueling areas to catch drips from the nozzles, etc.

7.3.3 Identifying Sensitive Areas
- Where would a spill end up (water, sewer, ground, air)?
- Are there any sensitive water bodies on the site on or near the site?

7.3.4 Storage of Hazardous Substances
- Hazardous substances must be stored in proper containers to minimize the potential for a spill.
- Whenever possible, hazardous substances should be kept in closed containers
- Store hazardous substances so they are not exposed to storm water
- Provide secondary containment or double walled tanks for any containers larger than 55 gallons.

7.3.5 Best Management Practices
- Areas where chemicals or materials may be used or stored must be maintained using good housekeeping practices. This includes, but is not limited to, clean and organized storage, labeling, and secondary containment where necessary.
- Identify standard operating procedures for fueling equipment and other routine tasks to eliminate spills.
- Put maintenance and inspection procedures in place for material storage areas, equipment, tanks, hydraulic hoses, vibro hammers, etc.

7.4 Spill Response

7.4.1 Remain calm. If there is danger of fire, call the local fire department.

7.4.2 If you can do it safely (if you do not know what has spilled then you cannot do it safely) then:
- Stop the source of the spill, if possible, by valving, plugging, caulking, or other means available. Secure the area with barrier tape.
- Take any brief action that will prevent or delay oil from reaching navigable waters or spreading across the surface of the ground. This may require building a dike with soil, speedy-dri, rags or pads; or digging a trench to divert the flow of oil.

7.4.3 If a brief action will not be effective or once you have taken what action you can, notify your supervisor about the spill so we can involve additional help and resources

7.4.4 Identify who will make notification calls and what methods will be used in the site specific plan. Ensure identified communication equipment is always available.

7.4.5 Notify Appropriate Parties
- Notify the Corporate Manager of Health and Environmental Hazards within 30 minutes of identifying a spill
- Notify the state environmental agency within 2 hours at the number contained in the site specific spill plan
- Notify the National Response Center at (800) 424-8802 within 2 hours if any amount reaches the water or the spill involves reportable quantities that have or are likely to leave the site.
- Notify the client as identified in the site specific spill plan
- Document to who and when the notifications were made
7.4.6 Spill Kits
The potential spill operations or areas you identified in section 7.1.1 will determine what you need for spill kits based on what materials can be spilled and how much.
- Identify what materials are needed in each kit (socks, booms, pads, absorbents, shovels, etc.)
- Identify how big the spill kits need to be
- Identify where spill kits are to be located
- Identify how many spill kits are needed
- Include necessary PPE
- Do weekly inspections to ensure spill kits are available and complete when needed
- Ensure the spill kits are clearly labeled and easily available

7.4.7 Spill Cleanup
- Clean up all possible traces of spills
- Identify how much of the product is recovered
- Store in appropriate bags and containers

7.4.8 Waste Disposal
- Determine whether the spill clean up material is a hazardous waste or not
- Dispose of it through the client or one of Cianbro’s approved waste haulers (Refer to the Cianbro Hazardous Waste/Hazardous Materials Handbook).
- Contact the state you are working in to identify other disposal options

7.4.9 Spills to Water
- Ensure plans are in place to prevent any spill to water
- All spills to water must be reported to the National Response Center
- If oil has or will reach a water source, deploy an oil boom. This must be done for any spill involving a product entering water or potentially entering the water.
- Ensure adequate spill boom is on site.

7.5 SPCC Plans
7.5.1 A plan is generally required for any facility with more than 1,320 gallons of aboveground oil storage capacity in containers of 55 gal or more. It does not matter how much is actually in the container, you must include all containers of 55 gal or larger. Motive power tanks (fuel tanks on equipment to provide motive power) and permanently closed containers do not have to be counted.

7.5.2 “Oil” as defined under federal regulations includes petroleum oils such as gasoline, diesel, kerosene and heating oil, as well as non petroleum oils such as animal and vegetable oils, synthetic oils, biodegradable oils, and mineral oils.

7.5.3 The plan must be certified by a registered Professional Engineer or if a qualified Tier I facility the plan may be self-certified. (A Tier 1 facility is defined in 40 CFR§112.3(g)(1))

7.5.4 The plan must be reviewed by the owner every five years. This periodic review of facilities should give consideration to any changes in codes, standards and available technology in order to keep facilities up to the “state-of-the-art”; and, the review will determine if there is a need to amend the plan. Plans must also be amended whenever there is a change in the facility that would affect the plan

7.5.5 Cianbro must also certify their commitment to make available the resources necessary to implement the SPCC Plan and to control and remove any discharge

7.5.6 Contact the Manager of Health and Environmental Hazards if the criteria contained in 7.5.1 are expected to be exceeded for information on how to develop the plan.

7.6 Spill Reports
7.6.1 Completely fill out the Cianbro Spill Report (Form SD832) including the agency contacts and any assigned spill numbers. Include pictures, MSDS’s, etc as appropriate.

7.6.2 Send the completed form to the Manager of Health and Environmental Hazards by email to corpsafety@cianbro.com. Send the original by interoffice mail.

8 Budget / Approval Process

8.1 It is the responsibility of each jobsite to procure and provide all materials and PPE required and provide necessary training.

9 Related Documents

9.1 See attachments.
National Response Center
A facility should report discharges to the National Response Center (NRC) at 1-800-424-8802 or 1-202-426-2675. The NRC is the federal government's centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel.
If reporting directly to NRC is not practicable, reports also can be made to the EPA regional office or the U.S. Coast Guard Marine Safety Office (MSO) in the area where the incident occurred.

- Name, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the discharge
- Types of material(s) discharged
- Quantity of materials discharged
- Danger or threat posed by the discharge
- Number and types of injuries (if any)
- Weather conditions at the incident location
- Other information to help emergency personnel respond to the incident

EPA Regional Administrator
Under the SPCC Rule: A discharge must be reported to the EPA Regional Administrator (RA) when there is a discharge of:

- More than 1,000 U.S. gallons of oil in a single discharge to navigable waters or adjoining shorelines
- More than 42 U.S. gallons of oil in each of two discharges to navigable waters or adjoining shorelines occurring within any twelve-month period

When determining the applicability of this SPCC reporting requirement, the gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining...