SECTION 2 CHAPTER 6
SPILL PREVENTION & RESPONSE

Purpose

The purpose of this plan is to document spill prevention and response requirements. Each Company work site will develop a spill prevention and response plan based on the requirements and template provided.

Scope

This procedure applies to all Gravity Oilfield Services (hereafter referred to as Company) operations. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

In this chapter

Spill Prevention & Response – Requirements

Requirements

Each work site spill prevention and response plan shall contain the following requirements:

- Chemical substances should be stored in proper containers to minimize the potential for a spill. Whenever possible, chemicals should be kept in closed containers and stored so they are not exposed to stormwater.
- The program must identify chemicals used that may be potentially spilled or released. This will include both liquid chemicals used at our facilities or brought on to owner client sites.
- Spill kits must be adequate for any anticipated spills. A proper spill kit must contain the appropriate supplies for materials that may be spilled. Supplies must be easily accessible when required, and considerations must be made for both the type and quantity of materials. The contents of spill response kits shall be periodically assessed to ensure the availability of adequate spill response supplies and adjust inventory as necessary.
- The Company shall ensure the availability of adequate spill response supplies by periodic inspection to assess their availability and adjust the inventory as necessary.
- Employees must be instructed on spill prevention and the proper response procedures for spilled materials. The training should include materials available for use, proper waste disposal and communication procedures.
- Areas where chemicals may be used or stored must be maintained using good housekeeping best management practices. This includes, but is not limited to clean and organized storage, labeling and secondary containment where necessary.
- Proper communication measures for employees to initiate in the event of a spill will be created on a site by site basis. Communication procedures will be based on type and quantity of materials spilled.
- Environmental spills shall be reported to environmental authorities when required. Reporting procedures will be based on type and quantity of materials spilled.

The following template on the next page shall be used for each work site.

Spill Prevention & Response Plan

Location(s) of Plan(s):_____

Facility Information

Facility Name: _____

Mailing Address: _____

_____

Physical Address if Different: _____

_____

_____

Owner Name: _____

Owner Address: _____

_____

Primary Contact Name: _____

Work Phone: _____

Home Phone: _____

Mobile Phone: _____

Secondary Contact Name: _____

Work Phone: _____

Home Phone: _____

Mobile Phone: _____

Date of Initial Operation: _____

Site Assessment

Location – Describe where facility is located:

_____

_____

Facility Description

Facilities and Equipment (**examples are shown but complete per site description**):

___Garage for vehicle processing

___Parts storage Please list: _____

___Manufacturing Building _____

___Spill kit/emergency equipment _____

___Refrigerant (Freon) extractor _____

___Parts washer _____

Services:

___Dismantler/Recycler

___Equipment Repair Please list: _____

___Moving Equipment _____

___Painting/Sandblasting _____

___Manufacturing _____

Fixed Storage - List capacity and contents of each storage container. For example, "One 6,000 gallon above ground tank containing diesel fuel." Be sure to include diesel, gasoline, waste oil, heating oil, kerosene, paint thinner and other solvents. Also describe the construction of the containers, secondary containment for each, liquid level indicators, alarms and method of corrosion protection for each container. _____

_____

_____

_____

Non-Fixed Storage - List capacity and contents of each storage container. For example, "One 55 gallon drum for recycled oil." Be sure to indicate what each container is used for, its condition and construction and how secondary containment is provided. _____

_____

_____

_____

Total quantity of stored materials: - The combined quantity of the materials listed above: _____ gallons

Oil Spill History

Place an X on the appropriate line and proceed accordingly.

___ There has never been a significant spill at the above named facility.

___ There have been one or more significant spills at the above named facility. Details of such spill(s) are described below. For each spill that occurred, supply the following information:

- Type and amount of oil spilled
- Location, date and time of spill(s)
- Watercourse affected
- Description of physical damage
- Cost of damage
- Cost of clean-up
- Cause of spill
- Action taken to prevent recurrence

Potential Spill Volumes and Rates

Fill in all applicable blanks.

Potential Event	Volume Released	Spill Rate
Complete failure of a full tank*	___ gallons	instantaneous
Partial failure of a full tank*	1 to ___gallons	gradual to instantaneous
Tank overflow**	1 to ___gallons	up to___ gallons per minute
Leaking during unloading***	up to___ gallons	up to___ gallons per minute
Pipe failure****	up to___ gallons	up to___ gallons per minute
Leaking pipe or valve****	several ounces to gallons	up to___ gallons per minute
Fueling operations****	several ounces to gallons	up to___ gallons per minute
Oil and grease	several ounces to quarts	spotting

* Volume of largest tank

** Calculate using the rate at which fuel is dispensed from the delivery truck into your tank(s).

*** Calculate using the rate at which petroleum would be withdrawn from the tank if it should have to be emptied (e.g., if it was being taken out of service).

**** Calculate based on the specifications of your equipment.

Spill Prevention and Control

Spill Prevention - Provide specific descriptions of containment facilities and practices. Include description of items such as double-walled tanks, containment berms, emergency shut-offs, drip pans, fueling procedures and spill response kits. Also, describe how and when employees are trained in proper handling procedures and spill prevention and response procedures.

Spill discharge and flow - For each potential spill source; describe where petroleum would flow in the event of a spill. For example, "The 6,000 gallon diesel tank has a pre-manufactured secondary containment system capable of holding 110 percent of the total volume of the tank" and, "A spill from engine repair would be contained inside the shop building and quickly cleaned up with oil absorbents." Incorporate site map by reference (see instructions under Appendices).

Spill response - Identify what equipment would be deployed by whom and in what situation. Also, include phone numbers for response agencies, e.g., U.S. Coast Guard, fire department, spill response contractors, etc. A copy of your spill response plan may be attached as an appendix to this plan in lieu of completing this section.

Security - Provide a description of how all containers are protected when the facility is not in operation or unattended. Include a description of fencing, access control, gates, locks, etc. that prevent access by unauthorized individuals.

Facility Inspections

Routine Inspections - Name facilities and the frequency with which they are inspected. For example, "The fuel pumps are inspected daily. The materials storage area is inspected monthly." Describe all facility containers, piping, etc. that is to be inspected. Name the person who has responsibility to implement preventative maintenance programs, oversee on-site inspections, coordinate employee training, maintain records, update the plan as necessary, and ensure that reports are submitted to the proper authorities.

Annual Inspections - Include a description of annual comprehensive inspections. For example, "A site inspection is also conducted annually by appropriate responsible personnel to verify that the description of potential pollutant sources are accurate, that the map reflects current site conditions, and that the controls to reduce the pollutants identified in this plan are being implemented and are adequate. This annual inspection will be conducted above and beyond the routine inspections done focusing on designated equipment and areas where potential sources are located."

Record Keeping

Describe record keeping procedures. For example, "Record keeping procedures consist of maintaining all records a minimum of three years. The following items will be kept on file: current plan, internal site reviews, training records, and documentation of any spills or maintenance conducted in regards to these sites." Maintenance Inspection, Employee Training, and Record Keeping logs are included in this template for your use.

_____
_____
_____
_____

Maintenance Inspections

Maintenance Coordinator Name:

Maintenance Coordinator responsibilities include implementation of preventative maintenance programs and oversight of on-site inspections.

Use this table to record inspections:

Facility Inspections	Date of Inspection	Name of Inspector	Result – Pass/Fail	Comments

Employee Training

Employee Training Coordinator Name: _____

Use this table to record spill prevention and response training.

Name of Employee	Date of Training	Type of Training/Topics Addressed

Record Keeping of Incidental Spills

Record Keeper Name: _____

Record Keeper responsibilities include maintaining records of incidents, updating the plan as necessary and ensuring reports are submitted to the proper authorities when necessary.

Incident No.	Type of Incident	Date of Occurrence	How it was Cleaned Up

Appendices

Site map - Attach a site map as Appendix A to this plan. You may attach an existing site map or create your own. If you use an existing map, be sure that the items listed below are included. If you need to create a site map, use a large enough piece of paper so all site plan elements may be seen and try to keep

the map to a scale (e.g. 1" = 20' The following instructions should guide you step-by-step. Please use a straight edge (ruler) while creating the sketch.

- The sketch should be oriented as if you were in a plane looking down on your property (an aerial view), with North at the top (draw an arrow indicating north).
- Draw and label all roadways surrounding the work site.
- Draw and label all facilities within the work site as close proportionately as possible.
- Draw an arrow(s) pointing in the direction of downhill flow of water when it rains.
- Draw the location and general layout of all vehicles associated with the work site.
- Label any rivers or waterways surrounding the work site.
- Draw and label all methods of entry to the work site.
- Draw and label the location of all fuel containment facilities.
- Draw and label the location of all in-place spill prevention, control and countermeasure devices.

Other attachments - List any additional information to be attached as Appendix B, C, D, etc. Label and staple the attachments to the end of this plan.

Appendix A: Site Map

Appendix B: Emergency Response Posting Locations

Appendix C: _____

Appendix D: _____

Management Approval

I certify that I have personally examined and am familiar with the information submitted in this document and that, based on my inquiry of those individuals responsible for obtaining this information, the information submitted is true, accurate and complete.

_____ _____

Signature Title

_____ _____

Printed name Date