

Manual Section 6	Issue Date 03/17/10	Revision Date 06/15/21	Policy Number LLCP-051
	Spill Containment & Control		

Purpose

This document establishes minimum spill containment and control measures to be utilized while working on any Company or Customer location

Scope

All LLC Companies including, Blanchard Industrial, LLC, GIS Engineering, LLC, Grand Isle Shipyard, Inc., and GWIS, Mack Steel, NuWave, Sun Industries; hereafter identified as “Company”.

Preventative Measures

Training

The Company will instruct its personnel in the operation and maintenance of equipment to prevent the accidental discharge or spill of oil and lubricants. Personnel shall also be made aware of the pollution control laws, rules and regulations applicable to their work.

Spill prevention briefings will be scheduled and conducted by the Company at intervals frequent enough to ensure adequate understanding of this plan. These briefings will highlight and describe the following:

- Possible equipment failure or malfunction;
- Precautionary measures;
- Standard operating procedures in case of a spill; and
- Equipment, materials and supplies used in clean-up of a spill.

Equipment Inspection and Maintenance

The Company will perform scheduled inspection and maintenance of fuel and lubrication equipment.

The inspection and maintenance of equipment shall include regular examination to assess general equipment condition of all containers, valves pipelines and hoses. The examination shall observe signs of deterioration, which might cause a spill, and signs of accumulated fluid indicating leakage. All leaks shall be promptly corrected.

On-Site Operations

Refueling Operations

The Company will ensure that all equipment refueling and lubrication are conducted to prevent accidental spills or discharges. As a result, such refueling operations shall take place within the right-of-way and at least 100 feet away from all wetlands unless it is impractical due to circumstances such as the following:

- Locations, such as on rugged terrain or steep slopes, where movement of equipment to refueling stations would cause excessive surface disturbance to the right-of-way;
- When removal of equipment from a wetland would result in additional adverse impacts to the wetland;
- Construction sites where movement of equipment to refueling stations from pre-fabricated equipment pads is impractical;
- Locations where the water body or wetland is located adjacent to a road crossing;
- Where flotation equipment is used, refueling will occur at designated docking locations; and,
- Refueling of immobile equipment including, but not limited to, bending and boring machines, air compressors and padding machines.

Refueling shall not take place within 100 feet of any known potable water wells.

Manual Section 6	Issue Date 03/17/10	Revision Date 06/15/21	Policy Number LLCP-051
Spill Containment & Control			

Preventative Measures

The Company will ensure that preventative measures during refueling or other operations, which may result in discharges or spills, address the following considerations.

Preventative measures equipment shall be sufficient to prevent discharged fluids from leaving the right-of-way, reaching wetlands and be readily available for use. These measures shall include some combination of the following:

- Dikes, berms or retaining walls sufficiently impervious to contain spilled oil;
- Quantity of absorbent and barrier materials determined by the Company to be sufficient to capture the largest reasonable foreseeable spill;
- Quantity of disposable drums or containers suitable for holding and transporting contaminated materials;
- Curbing;
- Culverting, gutters or channeling systems;
- Weirs, booms or other barriers; or
- Spill diversion or retention ponds.

Spill Preparedness and Response

Prior to construction, emergency spill kits will be on location. Spill kits will be located on all fuel trucks. The Chief Inspector shall be responsible for defining the duties and coordinating the response of all persons involved in cleanup of a spill.

Mitigated Measures-Standard Operating Procedure

Containment

Containment is the immediate priority in the case of a spill. A spill shall be contained on Company property or right-of-way, if possible.

Clean Up

Once a spill is contained, clean up procedures shall begin immediately. In no case shall containment equipment be used for the storage of contaminated material.

Notification

In the event of a spill, the client, construction supervisors and Company contacts shall be notified immediately.

Sampling

If a spill enters a body of water (ditch or larger), representative samples, upstream and downstream from the point of entry, shall be taken in clean glass jars by the company and refrigerated.

Manual Section 6	Issue Date 03/17/10	Revision Date 06/15/21	Policy Number LLCP-051
	Spill Containment & Control		

Excavation and Disposal

Small Spills

If the HSE Director determines that a spill is small enough and of the type of material that can be safely handled by the construction crew, the crew shall utilize construction equipment to containerize all spilled material, contaminated soil and absorbent material in a manner consistent with spilled material's characteristics.

Larger Spills

If the HSE Director determines that the construction crew itself cannot adequately address a spill, waste specialists shall be called in by the Company to handle those activities. The HSE Director will ensure that all excavated wastes and other contaminated materials are transported to a disposal facility licensed to accept such materials.

Reporting

Following a spill, the Company shall immediately prepare a Construction Site Spill report form. A copy will be kept on job. The form shall include the following details of the incident:

- Date and time of occurrence.
- Material spilled.
- Quantity spilled.
- Circumstances causing spill.
- Bodies of water involved or potentially involved.
- Is a sheen present?
- Size of affected area.
- Estimation of the depth that material has spread in water or on soil.
- Will the spill progress off Company property or right-of-way?
- Is it under control?
- Has clean up begun and what methods are being or will be used?
- Names of first observer and any others observing the incident.

Storage and Clean-Up Equipment

Land Construction

The following are things that may be needed during a spill:

- Absorbents including pillows, socks and wipe sheets for containment and pick-up of spilled liquids;
- Commercially available spill skirts (or the functional equivalent thereof), self-contained and pre-packaged with materials to contain a large variety of absorbents for small to large spills;
- Utilization or creation of structures such as gutters, culverts and dikes for immediate spill containment, where available and appropriate;
- Shovels, backhoe, etc. for excavation of contaminated materials;

Manual Section 6	Issue Date 03/17/10	Revision Date 06/15/21	Policy Number LLCP-051
Spill Containment & Control			

- Sumps and collection systems;
- Drums, barrels, temporary storage bags to clean up and transport contaminated materials;
- Absorbent pads or mats (quantity must be sufficient to capture largest foreseeable spill, e.g. crankcase capacity) for routine maintenance and refueling; and
- Small absorbent kits (or functional equivalent), that can be stored on construction equipment, capable of absorbing up to five gallons of liquid.

Stream and Wetland Crossing

For each stream and wetland crossing, certain other equipment should be available in addition to that needed for land construction. This equipment should be stored close to the water or wetland to minimize response time. The minimum additional equipment is:

- Oil containment booms and the related equipment needed for rapid deployment; and
- Equipment for the removal of oils from water such as oleophilic and hydrophobic absorbent booms and mats, or mechanical skimmers.

Fuel and Lubrication Oil Storage

The storage of fuels and lubricating oils create the potential for large spills. When parking fuel trucks or loading oil barrels, consideration shall be given to containment and clean up in case of a spill. Containment equipment shall be kept close to tanks and barrels so response time in the event of a spill can be minimized.

Routine Maintenance and Refueling

Prevention is the preferred alternative in the control of common spills that often occur during the changing of crankcase oil, repairing of hydraulic lines, addition of coolants, etc. Absorbent pads and mats, available from a number of supplies, shall be placed on the ground beneath equipment before refueling and maintenance. Maintenance personnel shall carry absorbent materials to each piece of equipment.