



(prepared by George S. Gamble, 2G Environmental, LLC)

Environmental Health and Safety (EHS) Policy

Hazardous Waste

Regulatory Reference: 40 CFR 261, Identification and Listing of Hazardous Waste; State specific hazardous waste rules.

Purpose: The purpose of this Hazardous Waste 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 as well as state specific rules for hazardous waste.

This procedure will help FBOs to recognize what is considered a hazardous waste and how to properly handle and dispose of hazardous waste. The EPA defines three different levels of waste generators:

- Large quantity generators (more than 2,200 pounds per month).
- Small quantity generators (between 220 pounds and 2,200 pounds per month).
- Conditionally exempt small quantity generators (less than 220 pounds per month).

General Requirements:

The federal EPA has set forth rules for proper handling, storage, and disposal of hazardous waste under 40 CFR 261. Hazardous waste is defined as listed wastes (typically a specific waste item or waste from a specific process stream) or characteristic wastes (flammable, reactive, corrosive, or toxic). Examples of hazardous wastes that may be generated at an FBO operation include oil based paint wastes, acids, Alodine wastes, solvents (that aren't recycled), batteries (that aren't recycled), and fluorescent lamps (that aren't recycled).

There are several guidelines that facilities should follow to avoid the requirements in the hazardous waste rules as shown below.

- Properly recycle all spent solvents.
- Properly recycle all used batteries.
- Properly recycle all used fluorescent lamps.
- Properly recycle all used oil.
- Dispose of all sumped AVGAS and jet fuel as a product to be burned for its BTU content. (Typically the used oil contractor will handle used AVGAS and used jet fuel as well as used oil.)

- Minimize hazardous wastes to remain under the limit of 220 pounds per month for the conditionally exempt small generator status.

If a General Manager is not sure if a waste is hazardous, he or she should contact the EHS/Safety office for assistance. If a facility exceeds the limit of 220 pounds of hazardous waste in any given month, he or she should contact the EHS/Safety office for assistance as the facility must obtain an EPA Identification Number and follow strict handling and shipping requirements.

Employees must not transport hazardous waste and must use only an approved transporter.

Storage of hazardous waste must include proper labeling (including the EPA Waste Code and date waste was generated), proper containers, and proper secondary containment. The facility should have access to spill response equipment if needed for a spill.

If a leak or spill of hazardous waste occurs, the leak must be immediately controlled (stop flow from valve or container if possible) and contained with available spill response equipment. Any clean-up activities must be conducted using an outside contractor trained and certified to handle hazardous waste.

Responsibilities:

1. Employees:

Employees must be aware of the requirements for identifying and handling hazardous waste, and proper response to a spill.

Employees must properly store hazardous waste and label containers properly (including the EPA Waste Code and date waste was generated).

Employees must wear proper personal protective equipment when handling hazardous waste. Each type of waste typically requires a different set of protective equipment, so if there are any questions, please call the EHS/Safety office. Equipment should include safety glasses, chemical resistant gloves, and possibly protective clothing.

Employees must not dispose of hazardous waste in any drains or dumpsters – no exceptions.

2. Managers/Supervisors:

Managers/Supervisors should ensure that employees are performing their work activities in a proper manner including handling, storage, recycling, and spill response.

Managers/Supervisors should ensure that employees respond appropriately to spills. Managers/Supervisors should make notifications to Federal, State, and Local environmental regulatory agencies if required.

Managers/Supervisors should ensure that hazardous waste is properly labeled (including EPA Waste Code and date waste was generated).

Managers/Supervisors should ensure that employees were proper protective equipment while handling hazardous waste.

Managers/Supervisors should ensure employees never dispose of hazardous waste in any drains or dumpsters.

3. EHS/Safety:

The Environmental Health and Safety (EHS)/Safety Department will monitor compliance with all environmental regulations including the hazardous waste regulations.

The EHS/Safety Department will assist in any environmental questions that may arise such as proper identification of waste items, proper storage, proper protective equipment, and response to spills.

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

Training:

If facilities remain under the limit for conditionally exempt small quantity generators (generate less than 220 pounds of waste in a month and store less than 2,200 pounds at any time) then no specific training requirements are required. If a facility exceeds these limits, they should contact the EHS/Safety office for training assistance.

Recordkeeping:

No shipping records or manifests are required if facilities remain under the limit for conditionally exempt small quantity generators (generate less than 220 pounds of waste in a month and store less than 2,200 pounds at any time).



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Environmental Health and Safety (EHS) Policy

Used Oil

Regulatory Reference: 40 CFR 279, Standards for the Management of Used Oil, State specific used oil rules.

Purpose: The purpose of this Used Oil 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 as well as state specific rules for Used Oil.

The EPA Used Oil regulations came about in the early 1990s to allow generators, transporters, and recyclers of used oil to properly recycle these items and streamline the requirements for this material.

General Requirements:

The Federal EPA has set forth rules for proper handling and recycling of used oil under the Standards for the Management of Used Oil regulations and the requirements for handling these items are simpler than the rules governing hazardous waste. A significant part of these rules includes the proper recycling of the used oil. Used oil may contain hazardous impurities such as heavy metals and must be protected from entering the environment. Recycling oil keeps it out of the landfills and thus protects the environment from potentially hazardous waste.

Proper handling of used oil includes proper labeling. Each used oil storage location must be labeled as "Used Oil" and the fill port for any used oil stored in underground storage tanks (USTs) must also be labeled as "Used Oil." Keep containers in good condition and free of leaks. If a leak occurs, it must be repaired immediately and any contaminated soil must be removed. Containers must follow the requirements of 40 CFR 112, Spill Prevention Control and Countermeasures, if the facility aggregate tank capacity exceeds 1,320 gallons.

Employees must not transport used oil. An approved transporter must be used (typically the company that recycles the oil).

Do not mix used oil with any other products such as waste jet fuel or waste AVGAS.

Any spills of used oil must be handled per the site specific SPCC Plan. The Manger/Supervisor should make any notifications to Federal, State, and Local environmental regulatory agencies and keep the EHS/Safety department informed along the way.

Many FBOs already have a used oil recycling company in place, however, if a used oil recycler is needed, companies can be located with the assistance of the Coordinating Committee for Automotive Repair (CCAR) on their web site at www.ccar-greenlink.org.

Responsibilities:

1. Employees:

Employees must be aware of the requirements for the handling of used oil, properly recycling used oil, and the proper response to spills of used oil.

Employees must properly store and label all containers with a “Used Oil” label.

Employees must know the proper method to respond to a spill of used oil and how to dispose of clean-up materials.

Employees must participate in a training session to discuss proper handling and proper response to spills of used oil. This training is incorporated into the Spill Prevention Control and Countermeasures (SPCC) training and needs to be completed annually.

2. Managers/Supervisors:

Managers/Supervisors should ensure that employees are performing their work activities in a proper manner including handling, recycling, and responding to spills of used oil.

Managers/Supervisors should ensure that employees respond appropriately to used oil spills. Managers/Supervisors should make notifications to Federal, State, and Local environmental regulatory agencies if required as identified in the facility SPCC Plan.

Managers/Supervisors should ensure that used oil containers are properly labeled.

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

3. EHS/Safety:

The Environmental Health and Safety (EHS)/Safety Department will monitor compliance with all environmental regulations including used oil regulations.

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

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

Training:

Employees must participate in a training session to discuss proper handling and proper response to spills of used oil. This training is incorporated into the SPCC training and must be completed annually. EHS/Safety is planning to develop used oil specific training materials and make them available to each FBO.

Recordkeeping:

No shipping records or manifests are required.

Documentation of the training activities must be maintained as defined in the SPCC Program.



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Environmental Health and Safety (EHS) Policy

Used Fluorescent Lamps

Regulatory Reference: 40 CFR 273, Standards for Universal Waste Management, State specific recycling rules.

Purpose: The purpose of this Used Fluorescent Lamp 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 as well as state specific rules for Used Fluorescent Lamps and Universal Waste.

The EPA Universal Waste regulations came about in the early 1990s to allow generators of certain common waste items to properly recycle these items and streamline the requirements for these items. Items regulated in the Universal Waste rules include the following.

- Used Batteries.
- Used Florescent Lamps.
- Pesticides.
- Mercury containing equipment.

General Requirements:

The Federal EPA has set forth rules for proper handling and recycling of used fluorescent lamps under the Universal Waste Rules and the requirements for handling these items are simpler than the rules governing hazardous waste. A significant part of these rules includes the proper recycling of the used fluorescent lamps. Fluorescent lamps contain mercury and are therefore hazardous to the environment. Recycling fluorescent lamps keeps them out of the landfills and thus protects the environment from potentially hazardous waste. The regulations include recordkeeping requirements for Large Quantity Handlers (greater than 5,000 KG stored at any one time), but all FBO operations should fall below this limit and thus should not be required to maintain specific records.

Proper handling of used fluorescent lamps includes proper labeling. Each Fluorescent Lamp or each storage location must be labeled as “Used Fluorescent Lamps” and the storage area needs to be labeled with the date accumulation began (date of last shipment) as fluorescent lamps can be stored no more than one year.

When florescent lamps are replaced, the used lamps must be placed in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps. It is recommended to use one of the boxes that the new lamps were delivered in, but be sure to label the used lamps with a "Used Fluorescent Lamps" label.

Broken lamps must be placed in a closed, structurally sound container that is compatible with the contents of the lamp and must keep any releases of mercury inside the package. Broken lamps should be placed in a closed plastic container and the lid should be taped closed. These containers should be labeled as "Broken Fluorescent Lamps."

Many FBOs already have a recycling company in place, however, if a recycler is needed, companies can be located with the assistance of the Association of Lighting & Mercury Recyclers on their web site at www.almr.org.

Employees must not transport used fluorescent lamps to recycling center. Use only an approved transporter (usually the company that recycles the fluorescent lamps).

Responsibilities:

1. Employees:

Employees must be aware of the requirements for the handling of used fluorescent lamps, properly recycling used fluorescent lamps, and proper response to broken lamps.

Employees must properly store and label used fluorescent lamps and must mark the storage area with the date that fluorescent lamps were accumulated (date of last shipment to the recycler).

Fluorescent lamps may be accumulated for a period of no more than one year before they are sent to a recycler.

Employees must know the proper method to respond to a broken fluorescent lamp and how to properly package it for shipment.

Employees must participate in a training session to discuss proper handling and proper response to broken lamps. Training only needs to be completed initially and no refresher training is required.

2. Managers/Supervisors:

Managers/Supervisors should ensure that employees are performing their work activities in a proper manner including handling, recycling, and response to broken lamps.

Managers/Supervisors should ensure that employees respond appropriately to broken lamps. Managers/Supervisors should make notifications to Federal, State, and Local environmental regulatory agencies if required.

Managers/Supervisors should ensure fluorescent lamps are stored for less than one year before they are shipped to a recycler.

Managers/Supervisors should ensure that used fluorescent lamps are properly labeled.

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

3. EHS/Safety:

The Environmental Health and Safety (EHS)/Safety Department will monitor compliance with all environmental regulations including Universal Waste and used fluorescent lamps.

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

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

Training:

Employees must be trained to include proper handling and emergency procedures. This training is only required initially and no refresher training is required. EHS/Safety is planning to develop training materials and make them available to each FBO.

Recordkeeping:

No shipping records or manifests are required.

Documentation of the training activities must be maintained and must include the person’s name, date of training, and topics covered.



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Environmental Health and Safety (EHS) Policy

Used Batteries

Regulatory Reference: 40 CFR 273, Standards for Universal Waste Management, State specific battery recycling rules.

Purpose: The purpose of this Used Battery 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 as well as state specific rules for Used Batteries and Universal Waste.

The EPA Universal Waste regulations came about in the early 1990s to allow generators of certain common waste items to properly recycle these items and streamline the requirements for these items. Items regulated in the Universal Waste rules include the following.

- Used Batteries.
- Used Florescent Lamps.
- Pesticides.
- Mercury containing equipment.

General Requirements:

The FBO handles a variety of batteries from large lead acid batteries to small nickel cadmium rechargeable batteries. Most of these batteries contain hazardous materials and thus must be handled properly to ensure no damage to the environment occurs.

The Federal EPA has set forth rules for proper handling and recycling of used batteries under the Universal Waste Rules and the requirements for handling these items are simpler than the rules governing hazardous waste. A significant part of these rules includes the proper recycling of the used batteries. Recycling batteries keeps them out of the landfills and thus protects the environment from potentially hazardous waste. The regulations include recordkeeping requirements for Large Quantity Handlers (greater than 5,000 KG stored at any one time), but all FBO operations should fall below this limit and thus should not be required to maintain specific records.

Proper handling of used batteries includes proper labeling. Each battery or each storage location must be labeled as "Used Batteries" and the storage area needs to be labeled with the date accumulation began (date of last shipment) as batteries can be stored no more than one year.

Employees must not transport used batteries to recycling center. Use only an approved transporter (usually the company that recycles the batteries).

If a leak occurs on any battery, the leak must be immediately contained. Use absorbent materials to capture the leak and place the battery in a pan or other container that will contain any residual leaking fluid. Handle all clean-up wastes per EPA Hazardous Waste rules.

Responsibilities:

1. Employees:

Employees must be aware of the requirements for the handling of used batteries, properly recycling used batteries, and proper response to a spill.

Employees must properly store and label used batteries and must mark the storage area with the date that batteries were accumulated (date of last shipment to the recycler). Batteries must be accumulated for a period of less than one year before they are sent to a recycler.

Employees must know the proper method to respond to a leaking battery and how to contain any leaking fluid.

Employees must participate in a training session to discuss proper handling and proper spill response. Training only needs to be completed initially and no refresher training is required.

2. Managers/Supervisors:

Managers/Supervisors should ensure that employees are performing their work activities in a proper manner including handling, recycling, and spill response.

Managers/Supervisors should ensure that employees respond appropriately to spills. Managers/Supervisors should make notifications to Federal, State, and Local environmental regulatory agencies if required.

Managers/Supervisors should ensure batteries are stored for less than one year before they are shipped to a recycler.

Managers/Supervisors should ensure that used batteries are properly labeled.

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

3. EHS/Safety Department:

The Environmental Health and Safety (EHS)/Safety Department will monitor compliance with all environmental regulations including Universal Waste and used batteries.

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

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

Training:

Employees must be trained to include proper handling and emergency procedures. This training is only required initially and no refresher training is required. EHS/Safety is planning to develop training materials and make them available to each FBO.

Recordkeeping:

No shipping records or manifests are required.

Documentation of the training activities must be maintained and must include the person's name, date of training, and topics covered.



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Environmental Health and Safety (EHS) Policy

Storm Water Pollution Prevention Plans (SWPPP)

Regulatory Reference: 40 CFR 122, EPA Administered Permit Programs: The National Pollutant Discharge Elimination System (NPDES); 40 CFR 123, State Program Requirements; and State Specific Storm Water Regulations.

Purpose: The purpose of this Storm Water Pollution Prevention Plan (SWPPP) Program is to establish a framework for each Fixed Base Operation (FBO) to become and remain compliant with Federal Environmental Protection Agency (EPA) rules as well as state specific rules for storm water discharge permitting and control.

Airports typically have an airport wide storm water permit obtained from the state environmental regulatory agency. This permit typically includes sampling requirements (usually managed by the airport authority), storm water pollution prevention team members (may or may not include tenant facilities), inspection requirements (may or may not include tenant facilities), training requirements, and requirements for the preparation of a SWPPP.

General Requirements:

As described above, airports typically have an airport wide storm water permit and may or may not have provisions for tenants. Each FBO should have a copy of the airport's permit and also the site specific SWPPP to ensure they are aware of all local requirements. The SWPPP should include a description of site specific Best Management Practices.

Typical Best Management Practices for airport facilities include the following.

- Good Housekeeping.
- Proper fuel transfer activities.
- Proper management of refueler trucks.
- Proper vehicle and equipment maintenance.
- Proper outside storage of materials.
- Proper handling of sumped fuel from aircraft.

Spills must be reported to the EHS/Safety Department. Spill reporting to regulatory agencies should follow the requirements in the site specific Spill Prevention Control and Countermeasures (SPCC) Plan.

Responsibilities:

1. Employees:

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

- Fuel and chemical storage.
- Fuel transfers.
- De-icing operations.
- Maintenance activities outside.
- Vehicle storage outside.
- Material storage outside.
- Sumping activities from aircraft.

Employees commonly make transfers of accumulated rain water from secondary 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 are required to maintain proper housekeeping in all work areas. Keeping work areas neat and clean is an important first step in maintaining good storm water control.

Employees must follow the Best Management Practices (BMPs) as defined in the Storm Water Pollution Prevention Plan and also as presented in the training. Examples of BMPs are provided in the General Requirements section of this procedure.

Employees are required to make an initial response to a spill if it occurs as defined in the SPCC Plan.

All employees that perform activities that may impact storm water quality must participate in initial and annual training to refresh their understanding of the EPA rules, the state rules, and the Storm Water Pollution Prevention Plan. The training must include the items shown in the Training section of this procedure.

Employees often perform routine monthly or quarterly inspections of areas that may impact storm water quality. Inspections must follow the checklist provided in the site specific SWPPP and maintained per the Recordkeeping section of this procedure.

2. Managers/Supervisors:

Managers/Supervisors must ensure that employees are performing their work activities in a proper manner including housekeeping, Best Management Practices, and general storm water control.

Managers/Supervisors must ensure that employees respond appropriately to spills. Managers/Supervisors must notify the EHS/Safety Department and must 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 must coordinate activities of environmental response contractors that may be assisting in the clean-up activities after a spill.

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

3. EHS/Safety Department:

The Environmental Health and Safety (EHS)/Safety Department will provide assistance for ensuring that each facility is compliant with the Airport's storm water permit and SWPPP.

The EHS/Safety Department will assist FBOs in setting up initial "train the trainer" sessions and can assist in any environmental questions that may arise.

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

Training:

The company has developed a general training program that assists the FBOs with the general compliance with the storm water regulations. This training includes a discussion of the regulatory framework, impacts of airport facilities, housekeeping, Best Management Practices, and also utilizes a video.

The EHS/Safety Department has provided assistance to the FBOs in conducting a train the trainer session and provided necessary training documents. Each FBO is responsible for conducting subsequent training for all employees that could impact storm water quality.

The site specific SWPPP should include initial and annual training requirements for all employees that could impact storm water quality. Training activities should include the following items.

- Pollution control laws, rules, and regulations.
- General facility operations
- Housekeeping practices.
- Best Management Practices (BMPs).
- Materials management.
- Spill response.
- Discussion of previous discharges, malfunctioning components, and new precautions

Recordkeeping:

Documentation of the following SWPPP 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 SWPPP and typically must be maintained for a period of three (3) years.
- Training records must document who received SWPPP training, the dates of the training, and the topics covered. These documents typically must be maintained for a period of three (3) years.



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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.