# Purpose

The purpose the procedure is to define the actions necessary to comply with EPA standards in accordance with the established Spill Prevention, Control and Countermeasures Plan for the EIC.

# Scope

This procedure applies to all EIC employees, contractors, and vendors performing work on company property that will involve oil-handling in volumes equal to or in excess of 10 gallons.

## Reference Standard

Environmental Protection Agency: 40 CFR 112.7

[EIC Spill Prevention Control and Countermeasures Plan](https://clemson.sharepoint.com/teams/SafetySteeringCommitee/Shared%20Documents/Safety%20System%20Documents/Safety%20Policies%20and%20Programs/SOP-058-EIC%20SPCC%20Plan.pdf)

# Responsibilities

1. All employees are responsible for assuring that all spill prevention, control and countermeasures are followed.
2. EIC management is responsible for identifying oil-handling personnel and ensuring training requirements are met.
3. EIC management is responsible for ensuring that the monthly and quarterly inspections are completed in a timely manner.
4. EIC management is responsible for ensuring proper cleaning materials are available to oil-handling personnel.

# Procedure

## Prevention

* All drums, totes or storage containers greater than 10 gallons are to be stored within containment:
  + 15 MW designated containment area
  + eGRID transformer yard containment
  + Mobile containment pallets
  + Temporary containment tubs
  + Other equipment designated for containment of spills
* Used or waste oil shall be removed on a semi-annual basis

## Controls

* Monthly inspections shall be completed of the EIC facility tanks, piping, secondary containment and loading areas
  + Monthly inspections are to be performed by EIC employees and are to be documented using form F-XXX-EIC Monthly SPCC Inspections
* Formal quarterly inspections are required to document that aboveground storage tanks, tank lines, valves, unloading areas, and loading areas are inspected for leaks, corrosion, pitting, cracking, and deterioration of foundation/supports.
  + Quarterly reports are to be performed and documented by the Lowcountry Safety Manager.

## Countermeasures

* Initial response shall include stopping or limiting the source of the spill, if possible.
* Secondary response shall include utilizing socks and booms to contain the oil
* Spills greater than 10 gallons require external provider for cleanup
  + Clemson University has contracted with EnviroSmart for this service.
    - EnvironSmart Phone Number: 843-722-0062
* Single spills less than 10 gallons are permitted be cleaned by EIC staff
  + Absorbent materials are available in oil handling areas:
    - 15 MW test bay
    - 15 MW containment area
    - Main hydraulic room
    - 7.5 MW test bay
    - eGRID high bay
* The emergency contact list for any spill is prominently posted throughout the facility.

# Training

All oil-handling personnel are to be trained in accordance to the SPCC Plan included as a reference standard in this document. All new employees are to be trained within the first 6 months of employment and all employees are required to have annual refresher training.

Training shall include:

* + - Review the SPCC Plan
    - Familiarization with storage areas
    - Familiarization with design and use of inspection forms
    - Instruction regarding proper notification procedures in the event of a spill

# Revision History

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| --- | --- | --- | --- | --- |
| Revision | Date | Summary of change | Author | Approver |
| A | 12/15/2020 | Initial issue | Kurt Rayburg  J. Curtiss Fox | Kurt Rayburg  J. Curtiss Fox |
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