

Safety Topics

VOLUME 01, ISSUE 8

AUGUST 2001

Spill Prevention, Control, and Countermeasure Plans

More commonly referred to as SPCC

By way of explanation, a series of events resulted in a visit by the Indiana Department of Environmental Management (IDEM) at one of our locations. The plant operator was asked to provide a copy of the SPCC plan, which he did! How many of you knew that we had a SPCC plan? IDEM sent a copy of our SPCC plan to the Environmental Protection Agency (EPA). They in turn contacted me to express their disappointment in our plan and to arrange an inspection at another of our facilities. This all happened last summer. As of June 1, 2001 a new final SPCC plan was in place for the locations that were inspected and I promised EPA that we would have a new SPCC plan in place at each of our locations in Indiana and Ohio by January 2002.

That is where I am today. To many of you this may not mean much. But the Agencies that are involved are very serious about Irving Materials, Inc. complying with the rules and regulations.

I am asking for assistance in making compliance a manageable issue. If everyone will contribute a little the whole job will be manageable.

What SPCC involves is simply preventing oil products from entering ground water or public water bodies. The plan that I have developed and EPA has approved is nine pages long and is rather complicated, but the actual implementation involves good housekeeping issues. (That is one reason I am taking the liberty of covering this in our "Safety Topics".)

SPCC requires that bulk storage of oil or oil products be inside secondary

containment. We already have this under control for fuel storage. We have some work to do yet where 55 gallon storage is involved.

The part of this that involves everyone is the housekeeping. Management is responsible for installation of structures needed for SPCC and for assuring that paperwork is maintained, but each person who checks and fills oil levels in equipment can be a part of minimizing spilled oil contamination of oil storage areas and work areas. If small quantities of oil are spilled, use an oil clean-up product to absorb the spill and also clean-up the absorbent.

The reason that we have secondary containment structures around oil product storage is pretty obvious, but I frequently find that drains for secondary containment structures are left open even after the water was drained out. If the valve is open, the containment structure is nearly worthless. If oil product is spilled in the containment structure, it must be cleaned up properly before the valve is opened. This becomes difficult when the containment structure has been used as a trash can. You can help here!

If we have an incident, whether on our property or someplace else, we have a responsibility to clean it up. If you have a spill while on the road, be sure to report it immediately. Management should have the tools available to clean-up and report a spill, if necessary. That is all outlined in the SPCC plan!

If you have any questions or comments please let me know! I expect that you will be hearing more about this.

SPECIAL POINTS OF INTEREST:

- Containing Spills – do your part to keep our sites clean!

For what it is Worth!

AKC Black and Tan German Shepard puppies born July 27, 2001. Six males and six females. Ready for adoption about September 7. Father hip certified and weighs about 115 lbs. If interested, contact Walt Tharp

This issue of my Safety Topics is addressed to those locations in Indiana and Ohio, but Kentucky, Tennessee, and Illinois have similar concerns and the suggestions provided still apply. It just happens that Indiana and Ohio are in a different EPA Region than Kentucky and Tennessee and therefore different people are looking over our shoulder. Kentucky has what is referred to as a "Best Management Practices" plan that Earl Kessler works at maintaining for each location in Kentucky.

