

## SPILL PREVENTION/RESPONSE PROGRAM

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### PURPOSE / SCOPE

The purpose of this Spill Prevention and Response Plan is to outline the procedures and training necessary to insure adequate and efficient control, containment, and management of waste materials [e.g. construction debris] and equipment fluids [e.g. diesel fuel, oil, etc.] which may be accidentally released during work operations and including loading, transport, and handling.

### ENVIRONMENTAL SPILL OR DISCHARGES

A spill/discharge is any process related material discharged to the environment (including liquids, vapors, haze or very small particulate matter/dust from a process).

- ✚ A reportable quantity (RO) is the amount of a spilled chemical above which notification to EPA and other government agencies is required within 15 minutes after the spill has been found by a contractor or other person.
- ✚ A list of chemicals should be available to contractors at a designated location in each customer facility.

### GENERAL ENVIRONMENTAL REQUIREMENTS

Winger Companies, herein referred to as Winger, is committed to environmental excellence. All Winger employees and visitors are expected to understand and comply with customer facility requirements:

**Air Pollution:** Visitors, contractors, and tenants must not release into the atmosphere, and shall take all necessary measures to prevent a release to the atmosphere of any air contaminants, regardless of source that may cause a violation of any local, state or federal regulations.

**Water Pollution:** Visitors, contractors, and tenants must prevent the discharge of any substances or materials that may cause pollution into any facility waterway. Visitors must also obtain prior approval from the Environmental Departmental designee for discharging any materials into any installation sanitary sewer system drain sink, clean-out, or sump.

**Storm Water Pollution:** Visitors, contractors, and tenants may not discharge any substance or materials onto the ground or into any storm drain of the facility. There are no exceptions. Visitors' vehicles may not be washed anywhere on facility property. Storage of materials outside must be kept to a minimum. For materials stored outside, a spill containment kit must be at the storage location and the storage area kept neat and clean. All stored materials must be kept in sealed containers. Any material that may present the threat of a storm water discharge must be stored under cover.

**Trash/Hazardous Waste:** All trash must be handled appropriately. Contractors shall properly label, store, and dispose of all waste materials they generate. Drums brought on site, once unloaded, must be accurately labeled at all times, even empty drums. Solid / hazardous waste must be segregated in accordance with container labels and waste disposal coordinated with the Environmental Department. Roll-off boxes will be used only for wastes designated on the box.

**Miscellaneous Environmental:** No chemicals of any kind may be brought on-site without approval of the Environmental Department. If approval is obtained, all containers must be properly labeled and a Safety Data Sheet (SDS) must accompany the chemical when applicable and be provided to the facility. Visitors, contractors, and

tenants are responsible for taking necessary measures to prevent chemical spills or releases. SDS's for chemicals on the facility can be obtained from the safety department.

Environmental Aspects and Impacts: Environmental aspects and their associated impacts are posted in active areas of the facility. It is your responsibility to understand aspects and impacts for areas we enter. If you have questions, ask your facility contact person or your safety director.

## SAFE WORK PRACTICES

Our projects are typically multi-employer worksites. Winger employees must be aware of potential spills or discharges that could affect themselves, others and the environment. Communication must be made with the host facility. This will be performed during pre-job meetings, contractor orientation and at the direction of customer facilities. Employees should be aware of owners' contingency plans and provisions.

It is Winger policy that, in order to minimize both the chance of a spill and the consequences of a spill, that all chemicals and wastes shall be stored in a designated and controlled holding area. The storage area shall be designated in consultation with the client/owner and designed to physically limit the spread of liquids to drains or other sensitive areas.

Good housekeeping is an integral part of any job site. To further minimize the likelihood of a spill, each job site will be kept clean and orderly. It is the supervisor's responsibility to maintain proper housekeeping and identify any potential spill scenarios.

## SECURITY AWARENESS PLAN

- ✚ Report any suspicious behavior, incident or item on site to Cargill management.
- ✚ Suspicious behavior may include:
  - ✚ Person acting nervous or hiding something
  - ✚ Person making unusual or repeated requests for information
  - ✚ Person/people loitering inside or outside of a plant
  - ✚ A vehicle driving by without lights on or parked outside for unusually long periods of time, etc.

## STORMWATER RUNOFF MANAGEMENT

- ✚ Report all spills immediately to customer personnel or activate EAP for that facility.
- ✚ All spilled material must be cleaned up within a reasonable time and disposed of properly.
- ✚ Proper spill kits will contain the appropriate supplies for materials that may be spilled.
- ✚ Supplies will be easily accessible when required and considerations will be made for both the type and the quantity of the materials.
- ✚ All outdoor chemical storage tanks require secondary containment. Any tanks (i.e. small gasoline or diesel tanks) brought on site by a contractor must meet customer's storage requirements and must be registered with their management process.
- ✚ In the case of flammable liquids approved cabinets must be used.
- ✚ Access to chemical storage shall be limited to authorized individuals.
- ✚ Further, chemical substances will be stored in proper containers to minimize the potential for a spill.
- ✚ Clearly label where chemicals and waste chemicals are stored. Accurately label the waste containers as to their exact contents.
- ✚ Whenever possible chemicals should be kept in closed containers and stored so they are not exposed to storm water.

## WASTES- SPILL CONTROL AND EMERGENCY RESPONSE PROCEDURE

If an incident occurs which causes an unintentional release of wastes, chemicals, and/or equipment fluids, the procedures as noted below must be followed:

- ✚ Investigate and if necessary activate the Emergency Action Plan (EAP) immediately.
- ✚ The response must occur as soon as safely practical. The supervisor will estimate the quantity of material released and decide whether simple material handling or machinery, such as a front end loader or fork lift, will be required to reload the material into a container.
- ✚ In all cases, the supervisor will immediately notify the client contact about the spill and the circumstances of the incident and provide a telephone number or location where a return call may be made to provide further instructions or assistance in evaluating the specific action that should be taken.
- ✚ Immediately after making initial contact with the client or Project Manager, the supervisor will follow the recommended response.
- ✚ If necessary the supervisor and customer will work in coordination to promptly call local emergency services (911) and notify them of the incident including the size, nature, and location of the spill.
- ✚ If necessary a Winger Incident Form will be filled out by the foreman with a detailed description of the event and a copy will be distributed to the client.

## WASTE DISPOSAL

Prior to working on a job site the Project Manager shall, in conjunction with the client, determine the means and procedures for handling and disposing of contract generated waste material. Project wastes, trash, and/or scrap materials will be taken into consideration before work begins. The Project Manager shall then document the plan and inform the supervisor of the requirements. The general guidelines for handling waste material are:

- ✚ Any waste material shall be stored in such a way so as to prevent its release or spreading.
- ✚ To the best degree possible wastes will be segregate to take advantage of opportunities for recycling.
- ✚ Each job site is to be cleaned at the end of the day by sweeping and picking up of uncontained waste.
- ✚ As necessary, a designated and possibly secured, waste storage area may be established.
- ✚ Supervisors should practice good personal hygiene during the handling of any waste. Appropriate Personal Protective Equipment, including protective clothing (e.g. boots, safety glasses, and gloves) should be used when handling any waste material.

## HAZARDOUS WASTE

Hazardous waste would be products that would not be disposed of in general trash dumpsters. Examples of Hazardous Waste include (but are not limited to):

- ✚ Solvents,
- ✚ Epoxy,
- ✚ "Empty" Aerosol Cans,
- ✚ Liquid Paint Waste,
- ✚ Degreasers that contain chlorinated solvents or waste that contains: Arsenic, Mercury or Methanol.
- ✚ Ignitable waste (solid or liquid) with a flash point less than 140 F,
- ✚ Liquid waste with a pH of <2,
- ✚ Reactive Waste (reacts violently with water),
- ✚ Nuclear radiation devices for level gauges are used in several different locations. Only personnel specifically trained to be a Radiation Safety Officer are allowed to work on these devices. Special disposal procedures must be followed for disposal.
- ✚ Used oil includes hydraulic fluids, lubricants, etc. and is collected for recycling. These must not be mixed with any other wastes such as antifreeze or any other process liquids. Used oil dry/absorbent is collected

in designated locations and must not contain free liquids. To dispose of used oil dry material, put the material in a sealed bucket and put the entire bucket in the designated location on the job site.

- ✚ Universal waste includes all halogen and fluorescent light bulbs, lithium batteries, NiCad batteries, led batteries, and electronic equipment such as CPU's, monitors, printers, etc. All universal waste can be taken to a designated location for disposal.
- ✚ No wastes of any kind are to be removed from a customer facility unless by an approved and licensed vendor.

## **TRAINING**

All employees involved in the handling of wastes will receive initial training and annual refresher training in this Spill Prevention and Response Plan. Training will cover all aspects of the Spill Prevention and Response Plan as outlined above. Further, employees will be instructed on the proper response procedures for spilled materials.

## **SOURCE CREDITS**

U.S. Department of Labor, Occupational Safety and Health Administration, [www.osha.gov](http://www.osha.gov)  
Cargill Corn Milling North America, Contractor Environmental Training  
Mollenberg-Betz Mechanical Contractors, Spill Prevention/Response Program  
Cargill Sweeteners North America (SNA), Contractor Environmental Training  
American Ordnance LLC

## **DOCUMENT CONTROL**

Initial Program March 15, 2013  
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