ENVIRONMENTAL

Improve Your Spill Preparedness



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Imagine that one of your employees comes and tells you that a 100-gallon spill just took place at your facility and it is flowing swiftly toward a storm sewer on your property. Suddenly all eyes are on you. What you do next will show your leadership and skill at addressing the issue and limiting the company's liability. Are you ready to be the hero, or is spill preparedness the one item that just keeps slipping down your to-do list?

For facilities with an SPCC Plan, the required annual training provides a great opportunity to train your employees on how to be prepared for a spill. With proper training, your staff can make you look like a hero when they have taken fast action to place controls to stop a spill from discharging to a waterway. The SPCC annual training requirement is a key element to spill preparedness as it also covers aspects on how to properly take control and countermeasure actions in the event of an oil spill.

Add a Mock Spill Drill to Annual SPCC Training

Customers have told us that their employees want more engagement and interactive elements as part of their annual SPCC training. Does your SPCC training currently include reviewing your SPCC Plan with a generic DVD or bland PowerPoint presentation, with limited interaction with your oil-handling employees? If it does, try conducting a mock spill drill during your annual training session. Interactive, hands-on training not only engages your oil-handling employees, it also builds the "muscle memory" necessary to effectively handle real spill situations. A spill drill also can help to identify potential issues with the planned response techniques.

Review a Spill Kit

Another engaging training idea is to review a facility spill kit to understand the different spill response materials available in the kit and how to use them to help your facility control a spill. Each kit should include personal protective equipment (PPE) appropriate for handling the types and amount of chemicals that the kit is expected to control. PPE should be in good working order; replace any that is expired or showing wear.

Absorbent materials come in many styles and work in different ways. Teach oil-handling employees when to use granular absorbent, or pads and mats, and the proper way to lay booms and socks to prevent spills from seeping through the cracks.

If you use "oil-only" absorbents, help employees understand the situations in which these would be preferred over a universal absorbent. Training on the use drain blocks ensures proper deployment during a spill event.

Inspect an Oil Source

Conduct an inspection of a facility oil source using your SPCC Plan's monthly or quarterly inspection form as part of your training session. The inspection can help to familiarize staff with tank system components and their intended functions. Tailor the inspection criteria to prevent spills at your facility. Conducting an inspection on an oil source can help to increase awareness of the oil-handling employees.

Use Routine Inspections to Verify Spill Response Materials

Spill preparedness extends to practices beyond the annual training session. Consider adding a check of the facility's spill kits to your regular inspection routine. Because spill kits are typically kept in close proximity to oil sources, staff may occasionally dip into the kits to clean up small drips or spills. Most spill kits are designed to control a certain capacity of spilled oil. Don't get caught trying to clean up a 20-gallon spill with absorbent materials that won't give you enough absorption capacity. The inspections will give you an opportunity to check if spill kits need replenishment. Another consideration might be adding a list of spill kit materials and a contact person to the spill kit's lid.

Don't let spill preparedness slip down your to-do list again. Use these techniques to make your spill response training engaging and interactive for oil handling staff so spill preparedness becomes part of your routine and you're ready to be the hero when the next spill occurs.

Chris Jimieson has more than 17 years of experience helping industrial, commercial, military, federal, state, municipal, and solid waste companies with environmental compliance. Chris has extensive experience helping printing companies with SPCC projects and manages compliance projects providing computer-based training modules to meet clients' employee compliance training needs. For questions about the SPCC rule or how to comply, contact Chris at cjimieson@scsengineers.com or (608) 216-7367.