

# AVOIDING OIL SPILLS

## CURBING COSTS AND MANAGING SCHEDULE CREEP

Spill prevention is a routine consideration for most operating facilities, but Spill Prevention, Control and Countermeasure (SPCC) plans are often overlooked during the construction phases, opening owners up to unnecessary environmental risks, increased liabilities and unwanted action by the Environmental Protection Agency (EPA).

Owners not only need to have these plans in place during construction, but also need all employees and subcontractors to be aware of the plans and be trained on how to properly handle an oil spill, whether it's diesel fuel leaking from a fuel tank or something more significant.

### MEETING REGULATIONS

While owners are often aware of the regulations affecting operational facilities, many are unaware that an SPCC plan is also required by the EPA during the construction phase of a project.

In general, the EPA requires that any site with more than 1,320 gallons of oil stored above ground in 55-gallon containers or larger must have an SPCC plan in place —

regardless of the stage of the project. This applies to diesel fuel tanks, emergency generators or any other source from which oil could spill, including equipment brought onto the site by subcontractors, even for temporary periods.

Failure to have a plan can lead to construction being halted, which could delay a project significantly.



It's important that **everybody on a construction site** who works with oil understands how to respond to a spill.



**Amy Reed**



“If you go into a project with everything meeting regulations and compliance, then everything goes so much more smoothly,” says Amy Reed, a senior environmental engineer at Burns & McDonnell. “You can put all your energy and focus into the construction aspect of the project without having to stop and go back to fix something.”

### PLANNING AHEAD

The impact of any oil on a site should be considered as early as the contracting phase, when project leaders are determining exactly how much oil will be brought on-site by subcontractors.

In the construction phase, laydown areas for operations should be established where prefilled equipment can be stored, assessed and regularly evaluated. By a project’s completion, SPCC plans should already be customized and ready to transition to the project’s operational phase.

Such plans take the buy-in of all stakeholders to properly consider the environmental repercussions of a potential oil spill and create a plan of action to quickly contain any spills or leaks before it could reach a water source.

“With the EPA requirements for SPCC plans, it’s about more than having a plan in writing that somebody sticks on a shelf,” Reed says. “You also are required to do inspections monthly, so you are going out and actually looking at the tanks. If something strange is going on with a tank, you are then able to fix the issue and correct it before there’s a potential release.”

A firm that has the appropriate environmental knowledge and experience can help create an effective SPCC plan. It also can verify the plan meets regulatory requirements and see to it that those who will be working with the plan on-site get the training needed to implement it.

“It’s important that everybody on a construction site who works with oil understands how to respond to a spill,” Reed says. “Having best management practices in place from the beginning is the most effective way to prevent oil leaks and drips from getting into the ground.”



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