

Environmental Requirements for Oil-Handling Employees Under NASSCO's SPCC Plan

EPA regulations on oil pollution prevention require NASSCO to prepare and implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan. These regulations require that all oil-handling employees working at NASSCO be briefed on the key components of this plan initially and annually thereafter. Subcontractors, team members, and other entities whose employees may handle fuel, oil, or other petroleum products while working at NASSCO are required to train their employees on the applicable requirements, as described below. For questions about these or any other NASSCO environmental requirements, call 619-544-7506.

Before You Begin

Material Safety Data Sheet Product Review

Before any fuel, oil, or other chemical product can be brought into NASSCO, the product must be reviewed and approved by the NASSCO Safety Department. This is accomplished by submitting a Material Safety Data Sheet (MSDS) and Review Form to the Safety Department. The product must not be brought on-site until you have received confirmation that the Safety Department has approved the product. For more information, contact NASSCO's Safety Department at 544-8444.

Employee Training

Before handling oils, fuels, or other petroleum products at NASSCO, your employees must be trained on and adhere to NASSCO's Best Management Practices (BMPs) applicable to those activities, as indicated below:

- Employees who operate oil/water separators must be trained on Best Management Practice #318
- Employees who perform crane fueling and urea loading must be trained on Best Management Practice #319
- Employees who work on or with oil-filled transformers or switches must be trained on Best Management Practice #320
- Employees who handle, store, or transfer oil or fuels in drums or other bulk storage containers must be trained on Best Management Practice #321
- Employees who fuel non-motive equipment must be trained on Best Management Practice #322

Over-Water Transfers

The requirements described in this document are applicable only to oil-handling activities conducted on land; different procedures exist for over-water transfers. If your company will be conducting over-water transfers, such as loading fuel or oil on to or off of a vessel or barges, please refer to ["NASSCO Environmental Instruction #5: Environmental Requirements for Over-Water Transfers"](#)

Spills and Leaks

Care must be taken to prevent spills, leaks, or other release of any material into the San Diego Bay. Spills and releases of chemicals or oil must be immediately reported to NASSCO Security 619-544-8401 according to NASSCO's spill reporting policy, as outlined in NASSCO's Best Management Practice #102.

Best Management Practices

The following is an overview of the general Best Management Practices (BMPs) applicable to the handling of petroleum products at NASSCO's facility. Each company that will handle oil, fuel, or other petroleum products is responsible for ensuring that their employees and direct subcontractors adhere to these requirements while working at NASSCO. Contact the Environmental Engineering Department at 619-544-7506 to request a complete copy of the applicable BMPs.

(BMP) #318: SPCC Practices for Oil/Water Separators.

If your company will operate an oil/water separator, it is responsible for:

- Maintaining this equipment in good condition and monitoring it at all times during use to prevent spills and leaks
- Oil which is skimmed off by the separators must be removed and placed in hazmat drum, labeled "USED OIL". Sludge must also be managed as a hazardous waste
- Persons wishing to discharge water/wastewater into a NASSCO oil/water separator or wastewater treatment device must first obtain authorization from NASSCO's Environmental Engineering Department; see "Environmental Instruction #8: Generation and Disposal of Water or Wastewater and Wastewater Discharge Request" for more information.

(BMP) #319: SPCC Practices for Crane Fueling and Urea Loading.

If your company delivers fuel or urea to cranes, it must follow NASSCO BMP #320, which specifies the following practices:

- Transfer of oil or urea may *not* be conducted near yard drains or near spill pathways to the Bay
- A spill kit must be readily available
- All transfer hoses are connected properly, not leaking, and spill pan is placed under hose connections
- While transferring fuel, the parking brake must be engaged on the delivery vehicle
- The delivery contractor is responsible for monitoring the tank levels during the delivery process and must be able to stop flow immediately in the event of a tank overflow
- To prevent overflows due to product expansion, Fuel Tanks may never be filled to more than 90% capacity

(BMP) #320: SPCC Practices for Oil Filled Transformers and Switches.

If your company will perform any maintenance or repair on oil filled switches or transformers, it must adhere to BMP #315, which requires that:

- Secondary containment must be provided for waste drums and transformer during fluid change outs
- Materials may not be stacked against or on-top of transformers
- Transformers and oil-filled switches must be protected from moving equipment
- Fluid transfers must be carefully monitored to prevent overflow of transformers and switches

- Transformer oil must be collected in hazardous waste drum and labeled "Transformer Oil"
- Disposal of transformers and PCB-containing oils must be coordinated with Environmental Department

(BMP) #321: SPCC Practices for Oil Drum Storage and Transfers.

If your company handles drums of oil, fuel, or other petroleum products (new or used), it must adhere to BMP #321, which requires:

- Drums must remain tightly sealed with a bolt-ring and safely secured whenever being moved
- All transfer processes must be carefully monitored to prevent overfills and spills
- If funnel is fixed to an accumulation drum, it must screw into lid and have a latching lid to prevent spills
- Transfers cannot occur over yard drains or where a spill path to the bay exists
- All oil storage areas in high risk areas, such as on piers or next to yard drains, require secondary containment
- Secondary containment must be kept clean and dry at all times
- Damaged containers may not be used to hold oil

(BMP) #322: SPCC Practices for Oil Belly Tanks.

If your company will fuel compressors, generators, pumps, or other non-motive equipment, it must adhere to BMP #322, which requires:

- Fuel tanks may not be filled beyond 90% of capacity
- All fueling operations must be carefully monitored to prevent spills or leaks and must never be left unattended
- Whenever possible, fueling should not be conducted on berths and piers or where a spill pathway to the Bay exists. If unavoidable, secondary containment should be used to protect from any spills or leaks
- All transfer equipment must be kept in good conditions and inspected frequently to ensure that it will not cause leaks or spills

Waste Management

Fuels, oils, oil-contaminated materials, and other hazardous wastes must be disposed of properly; these materials are prohibited from being discarded in the trash. Unless otherwise specified, NASSCO will provide hazardous waste drums and labels to its direct subcontractors. Master Ship Repair (MSR) Companies are responsible for providing waste drums and labels for their own activities and for those of their subcontractors. Your company is required to follow all applicable laws as well as NASSCO procedures for handling and disposal of hazardous waste. For additional information regarding hazardous waste disposal, refer to "*Environmental Instruction #7: Generation, Disposal, or Transportation of Hazardous Waste.*"

After the Work is Completed

Reporting

NASSCO has not established a monthly reporting requirement for handling of petroleum products. Unless your company performs another activity that requires monthly reporting (e.g., bilge water disposal, painting, blasting, welding, adhesive or solvent use), no monthly reports will be required.