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Appendix 6

BCI Diesel Generator Spill Prevention and Response Plan

Description

This spill prevention and response plan is developed for use at all Bechtel Communications sites where either temporary site power will be supplied by a rented or owned generator, or where a permanent backup power generator will be installed and fueled for initial start up testing. The requirements contained herein apply to Bechtel personnel and their contracted entities. This Spill Prevention and Response Plan is not intended to serve as the only source of spill prevention and response requirements, but rather provides requirements that meet Bechtel's standards and serve as the foundation for federal, state, and local regulatory compliance. Where subcontractor requirements are specified (e.g., inspections), any existing subcontractor spill prevention and response practice that differs from the requirements in this Spill Prevention and Response Plan may only be implemented if it meets or exceeds the requirements contained herein. Nothing contained in this Spill Prevention and Response Plan precludes the implementation and application of a subcontractor's spill prevention and response provisions which meet or supplement the requirements contained herein.

A diesel generator typically used in this application is either trailer or skid mounted, with a double-walled fuel storage tank attached to the base of the diesel generator. An auxiliary fuel tank may also be present. Temporary power generators will typically be fueled on a daily or every other day basis if no auxiliary tank is present, once or twice a week if an auxiliary tank is employed. Backup diesel generators are typically fueled every 12-18 months or as required by the site owner or operator; thus, this activity is outside the scope of this document. An emergency contact list that identifies key contact persons is included (Attachment 1) and is to be completed by the market and posted on the site and at the market office.

Inspection

Temporary generators are to be inspected on a weekly basis by the temporary generator / diesel fuel subcontractor to identify minor fuel or lube oil leaks and if necessary schedule maintenance or repairs. This information will be provided to the Bechtel Construction Field Coordinator / Power Coordinator. Backup diesel generators installed as part of Bechtel's scope of work are to be inspected during and after the initial fueling by the diesel fuel supplier and during and after start up testing by the Construction Field Coordinator / Power Coordinator to identify minor fuel or lube oil leaks and if necessary schedule maintenance or repairs. Inspection findings and needed maintenance/repairs shall be documented on the BCI Diesel Generator Inspection form (Attachment 2). If the inspection form is completed by the temporary generator / diesel fuel subcontractor, a copy shall be provided to the Bechtel Construction Field Coordinator / Power Coordinator.

Spill Notification

All spills, regardless of volume or severity, are to be immediately communicated to the ES&H Representative, who in turn will contact the Project Environmental Lead.

The ES&H Representative or Project Environmental Lead will go to the location of the spill, assess its severity (e.g., volume spilled, impacts to areas beyond the generator location, fire/explosion potential), and determine appropriate initial response actions. The ES&H Representative or Project Environmental Lead will also make a determination of the need for notifications to Bechtel corporate environmental and legal groups and/or regulatory agencies. The ES&H Representative or Project Environmental Lead may contact the BCI Environmental Services Manager for guidance on response actions and required notifications. In the absence of the BCI Environmental Services Manager, the BESH Environmental Services Manager may be contacted for assistance.

Within eight (8) hours after the initial report of the spill, the ES&H Representative or Project Environmental Lead will complete an Environmental Incident Report form (Attachment 3) and forward a copy to the BCI Environmental Services Manager and the Market Manager.

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Spill Prevention

The following actions shall be performed to reduce the potential for and severity of spills from the use of temporary or backup diesel generators:

1. Assure routine maintenance on the diesel generator and associated equipment is performed in accordance with manufacturer's recommendations.
2. Do not perform maintenance work on the diesel generator or in the immediate area of the diesel generator during fuel deliveries.
3. Perform visual inspections (weekly for temporary units; monthly for backup units) of the diesel generator and associated equipment and document the findings and corrective actions (if needed) on the BCI Diesel Generator Inspection form (Attachment 2). When performed by the temporary generator / diesel fuel subcontractor, documentation will be provided to the Bechtel Construction Field Coordinator / Power Coordinator.
4. Perform visual inspections of backup diesel generators and associated equipment immediately prior to fuel deliveries. Visual inspections of temporary diesel generators related to fueling activities will be documented during the execution of #3 above.
5. A spill response kit shall be available on the fuel delivery truck and/or in the immediate vicinity of any temporary or back up diesel generator.

Fuel Delivery Procedure

The following actions shall occur when a fuel delivery is made:

1. Determine the fuel level in the tank and calculate the volume required to be delivered prior to dispensing the fuel.
2. Prior to initiating fuel transfer, the fuel vendor will confirm that sufficient space is available in the receiving storage tank to receive the contents of the tank truck. Document the tank measurements.
3. The tank truck unloading will be done during daylight hours except under emergency conditions, and will be scheduled in advance whenever possible.
4. The tank truck must be operated by a trained fuel transfer operator, who will ensure that locked valves and fill caps are unlocked and that spill response materials (absorbent pads, booms and absorbent material) are in adequate supply.
5. Tank trailer brakes shall be set, the wheels shall be chocked, and **the driver shall remain with the vehicle** during the entire unloading period. Ensure proper methods are used for hose connection, tank filling, and hose disconnection and precautions are taken to avoid unnecessary dripping and/or releases from hoses and connection equipment. Ensure that the storage tank is vented prior to connecting unloading line.
6. Prior to filling (and again prior to departure of tank truck), the lowermost drain and all outlets of the vehicle must be examined for leakage and if necessary tightened, adjusted or replaced to prevent leakage while off-loading (or while in transit).
7. Ensure all hoses are connected tight and that a collection bucket is placed under the trailer-unloading valve.
8. Once unloading has ceased, the hoses will be disconnected such that any material in the lines will gravity drain into the tank, or be pumped into the tank. Any small dripping material shall be contained and removed.
9. The fuel transfer operator shall visually inspect the area for any releases and document the inspection.
10. If any spill occurs during the filling process, fuel flow must be stopped immediately and spill-reporting procedures initiated immediately.

Spill Response

In most cases, releases occur during fuel delivery when the driver has access to a spill response kit. However, in case the driver does not have the appropriate response equipment, the site will have a spill kit located adjacent to the diesel generator. In addition, if a spill occurs from the diesel generator, the site should be capable of controlling a small to moderate spill and cleaning up a small spill with the onsite spill kit. This spill kit will be checked twice yearly to ensure that the kit has not been depleted of its materials. The status of the spill kit will be documented on the BCI Diesel Generator Inspection form (Attachment 2) during the weekly inspection of temporary generators, including the date the spill kit was last inventoried.

In the event of a spill, the following items are to be performed and documented by attaching the checklist below to the Environmental Incident Report (Attachment 3).

Diesel Fuel Release Action Checklist

✓	Actions Required	Responsible Party
	Contact the Construction Field Coordinator / Power Coordinator and the ES&H Representative / Project Environmental Lead to notify them that a release/spill has occurred.	Generator or Diesel Fuel Subcontractor / Person Who Found Spill, Construction Field Coordinator / Power Coordinator, and/or ES&H Representative / Project Environmental Lead
	The Construction Field Coordinator / Power Coordinator will take control of the situation and act as the On-Scene Coordinator until properly relieved by the ES&H Representative / Project Environmental Lead.	Construction Field Coordinator / Power Coordinator and ES&H Representative / Project Environmental Lead
	Stop the source of the release if it can be done safely.	Generator or Diesel Fuel Subcontractor / Person Who Found Spill, Construction Field Coordinator / Power Coordinator, and/or ES&H Representative / Project Environmental Lead
	Notify the ES&H Representative / Project Environmental Lead that a spill has occurred.	Construction Field Coordinator / Power Coordinator, and/or ES&H Representative / Project Environmental Lead
	Stop all work activities near the release and evacuate personnel if there is a potential for risk.	Generator or Diesel Fuel Subcontractor / Construction Field Coordinator / Power Coordinator, and/or ES&H Representative / Project Environmental Lead
	Prevent the spill from moving into areas where the spill cannot be controlled (e.g., storm water drains, off site, public streets). Use the spill kit to "contain" the spill.	Generator or Diesel Fuel Subcontractor / Construction Field Coordinator / Power Coordinator, and/or ES&H Representative / Project Environmental Lead
	Extremely dangerous and/or serious releases require that 911 be called and the fire department responds.	Generator or Diesel Fuel Subcontractor / Person Who Found Spill, Construction Field Coordinator / Power Coordinator, and/or ES&H Representative / Project Environmental Lead
	Moderate sized releases will be cleaned up by an emergency response subcontractor after initial containment of the spill.	ES&H Representative / Project Environmental Lead

	The BCI Environmental Services Manager, or his designee, will be notified of the spill at the earliest time, no matter the volume.	ES&H Representative / Project Environmental Lead
	If necessary, BESH Environmental Services will be contacted to provide technical assistance during the spill.	ES&H Representative / Project Environmental Lead and/or BCI Environmental Services Manager
	If there is a potential liability issue, Bechtel Legal will be notified in conformance with Legal Instruction 127.	ES&H Representative / Project Environmental Lead and/or BCI Environmental Services Manager
	For significant releases, the appropriate regulatory agency will be notified within the prescribed time period.	Project Environmental Lead and/or BCI Environmental Services Manager
	Scene management will be implemented to prevent further release or to prevent people from entering the controlled area.	Generator or Diesel Fuel Subcontractor / Construction Field Coordinator / Power Coordinator, and/or ES&H Representative / Project Environmental Lead

Subcontractor Back Charges

As representatives of Bechtel, all subcontractors will plan and execute their work to ensure environmental issues are treated as a core value and that all Local, State, and Federal environmental regulations are met. Any subcontractor who knowingly disregards an environmental hazard and/or fails to report an environmental incident (e.g., release of hazmat or spill) will face financial sanctions. If a subcontractor generates a spill or hazard and fails to immediately contain and cleanup the hazard, Bechtel will hire other contractors to perform clean up to bring the site into compliance. The original subcontractor will be back charged, where back charge costs can include, but are not limited to:

- Response and remediation equipment
- Response personnel (e.g., supervisors, inspectors, operators, laborers)
- Storage of any contaminated or hazardous materials (e.g., temporary storage bins)
- Permitting fees, and/or approved disposal fees when required
- Handling, transport, and disposal of contaminated materials
- Remediation of air, soil, or water quality to local environmental standards
- Replacement with clean building materials and/or soils
- Temporary water supply when required
- Any other direct and/or indirect costs including payroll additives, net delivered material costs, and markups.