



[THE ENVIRONMENTAL ELEMENT]

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# Spill prevention training emphasizes preparation

Spill training usually references the undifferentiated phrase "prevention and response," and operators tend to assume that response training addresses prevention by default. However, response training usually focuses on the mechanics of successful spill recovery, while prevention training must address broader environmental compliance requirements. Plenty of response-trained operators gain an intimate understanding of open-water booming and skimming strategy but little practical knowledge of how to comply administratively with prevention-related regulations, or how to interface with the agencies that regulate them.

Many competent commercial response trainers are found throughout Texas and Louisiana, where oil-field and petrochemical operations, water transportation and spills are ways of life. In contrast, prevention training and the record-keeping that accompanies a sustained prevention program are more frequently managed at the operations level rather

2. Applicability and attendance. It may be best to train all employees regardless of job description. The SPCC rule plainly states that only "oil-handling" employees need training, but stormwater general permits often require awareness-level "education" for employees not directly involved with spill prevention, as well as "training" for those who are.

3. Frequency. Stormwater general permits and the SPCC rule require a minimum annual training schedule. Many operators find that frequent sessions of shorter duration are more effective; thus, training is often combined with regular safety meetings, which typically occur weekly or monthly.

4. Duration. In contrast to many Occupational Safety and Health Administration (OSHA) standards for which training lengths are set, no specific hour requirements are imposed by either the SPCC rule or by stormwater general permits. The schedule must include time for all topics to be addressed and employee questions to be answered, whether the training is completed in a single annual session or integrated into a series of safety meetings.

5. Documentation. Operators must ensure that the content of each training session is recorded. A blank sheet of paper can be used to record the signatures of attending employees, but is of little value during a regulatory agency audit unless it is accompanied by a description. A "menu" format (such as the example shown here) provides two benefits. First, by listing the required topics, it prompts the facility trainer and reduces the need for repeated regulatory reviews, thus potentially saving time. Second, by providing summaries of past sessions, the trainer can verify quickly what topics need to be covered in future sessions.

For more information, including details and dates for public SPCC and stormwater training classes held throughout Texas and Louisiana, please call Alison Steele Mandadi, P.G. (asteele@sscienvironmental.com) or Helen I. Hodges (hhodges@sscienvironmental.com) at (800) 324-7724 or visit [www.sscienvironmental.com](http://www.sscienvironmental.com). □

*Response training focuses on spill recovery, while prevention training emphasizes preparation and compliance.*

than being provided by vendors, and can be overlooked in view of the commercial emphasis on response. For these reasons, SSCI developed the following training outline for facilities subject to common prevention-related regulations, chiefly the Spill Prevention, Control and Countermeasure Rule (SPCC; Chapter 40 of the Code of Federal Regulations, Part 112) and many state and federal stormwater general permits.

1. Prevention training content. The scope of prevention training is described in the regulations and is reflected in the example blank form reproduced with this article (topics affect both employees and facilities to differing degrees depending on scope of operations, thus the "menu" format). Significant topical overlap exists among different environmental programs, and, while operators are free to develop prevention training that is regulation-specific, that may not be the most efficient management strategy.

## SPILL & POLLUTION PREVENTION TRAINING SIGN-IN & TOPIC SHEET

**TRAINING IS DONE IN ACCORDANCE WITH (check all that apply):**

Spill Prevention, Control, & Countermeasure (SPCC) Plan  
 Storm Water General Permit # \_\_\_\_\_  
 Other Regulation(s): \_\_\_\_\_

**TRAINER:**

Printed Name	Signature	Date
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**OPERATIONS TOPICS (check all covered in this session):**

<p><b>Good housekeeping:</b></p> <p><input type="checkbox"/> Basic cleanup procedures.  <input type="checkbox"/> Disposal procedures (e.g., absorbent).  <input type="checkbox"/> Minimization of contamination.  <input type="checkbox"/> Maintenance of work areas.  <input type="checkbox"/> Other: _____</p>	<p><b>Materials handling and storage:</b></p> <p><input type="checkbox"/> MSDS's &amp; how to use them.  <input type="checkbox"/> Container &amp; tank labeling.  <input type="checkbox"/> General safe work practices.  <input type="checkbox"/> Standard Operating Procedures.  <input type="checkbox"/> Other: _____</p>
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**Spill prevention and response procedures:**

Potential spill areas and drainage routes.  
 Past spill / slop events: source, what was done, & what will be done differently.  
 Emergency contacts and telephone numbers in the event of a major spill.  
 The role each employee plays in an emergency.  
 Spill clean-up procedures (what is done in-house; what might be contracted).  
 Other: \_\_\_\_\_

**MANAGEMENT TOPICS (check all covered in this session):**

<p><input type="checkbox"/> SPCC Plan overview.  <input type="checkbox"/> Storm Water Plan overview.  <input type="checkbox"/> Engineering (e.g., secondary containment, overflow, signage, lighting, system components).</p>	<p><input type="checkbox"/> Question &amp; Answer session.  <input type="checkbox"/> Operational / process review.  <input type="checkbox"/> Structural controls (e.g., drainage or diversionary system).  <input type="checkbox"/> Applicable regulations.</p>
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**EMPLOYEES ATTENDING (continue on reverse if necessary):**

Date	Printed Name	Signature	New Hire (Y or N)

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