ESTVOLD OILFIELD SERVICES

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE (SPCC) POLICY

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Title: SPCC Policy
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Policy Control Item	Policy Information
Company	Estvold Oilfield Services
Document Type	Policy / Program Manual / Field Forms / SPCC and Environmental Protection Audit Package
Applies To	All locations, tank batteries, yards, shops, storage areas, customer sites, vehicles, and field operations involving oil or petroleum products
Program Intent	Spill prevention, environmental protection, containment control, transfer operation control, emergency response readiness, regulatory compliance, and continuous improvement
Regulatory Alignment	EPA SPCC requirements, environmental protection expectations, spill prevention principles, client requirements, and company environmental management expectations
Revision	Comprehensive V2 - Editable Master
Approval	Management / HSE / Operations

INCLUDED IN THIS PACKAGE

- Full SPCC program management-system manual with operational implementation expectations
- Supervisor quick response guide and escalation logic
- SPCC hazard assessment, oil storage inspection, secondary containment inspection, and transfer operation tools
- Spill response, stormwater protection, environmental equipment, corrective action, and incident review forms
- Leadership accountability, KPI tracking, audit expectations, corrective action management, and continuous improvement framework

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DOCUMENT CONTROL

Revision	Date	Description of Change	Approved By
0	Initial Release	Original controlled document issue	Management
1	Current Draft	Expanded SPCC manual and forms package	Management
2	Current Revision	BBS master format alignment, management-system depth, forms expansion, KPI/audit framework, and implementation guidance	Management / HSE / Operations

This document is considered a controlled safety management document. Printed copies are considered uncontrolled unless verified current through the company safety management system, approved shared drive, or authorized document control location.

DISTRIBUTION AND CONTROL

Controlled copies may be distributed to HSE, operations management, field supervision, environmental coordinators, company shared safety systems, and client-required safety documentation platforms. Supervisors are responsible for ensuring field personnel have access to current SPCC expectations before conducting oil storage, fueling, transfer, maintenance, or environmental response activities.

IMPLEMENTATION NOTE

This manual is written so it can function as both a management standard and a supervisor reference. The forms at the end are intentionally detailed enough for field use, spill prevention review, containment verification, transfer operation planning, stormwater protection, corrective action tracking, and audit support. The program is not intended to be a paperwork exercise; it is intended to drive visible spill prevention discipline and environmental protection during daily operations.

HOW TO USE THIS MANUAL

- Use Sections 1 through 25 as the governing SPCC program standard.
- Use field forms before transfer operations, oil storage activities, fueling tasks, or work with spill exposure potential.
- Use inspection checklists to verify oil storage containers, secondary containment, drainage controls, stormwater protection, and response equipment.
- Review spill trends, near misses, inspection findings, and corrective actions during management review.
- Use the forms package as field documentation, environmental compliance evidence, client/audit support, and continuous improvement input.

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CONTENTS

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1. PURPOSE AND POLICY STATEMENT

Estvold Oilfield Services is committed to protecting employees, contractors, visitors, client representatives, the public, and the environment from hazards associated with oil spills and uncontrolled releases during company operations. Oil and petroleum product releases may result in environmental contamination, regulatory violations, property damage, operational disruption, cleanup liability, and long-term environmental impact.

This SPCC Program establishes a management-system framework for spill prevention, containment, transfer operation control, oil storage inspection, stormwater protection, emergency response readiness, documentation, leadership accountability, and continuous improvement.

No production expectation, operational pressure, or client demand shall take priority over environmental protection and employee safety.

2. SCOPE AND APPLICATION

This program applies to all Estvold Oilfield Services employees, temporary workers under company supervision, supervisors, management personnel, contractors, company vehicles, oil storage areas, and company-controlled worksites where oil or petroleum products are stored, transferred, handled, transported, serviced, maintained, or used.

The process applies to tank batteries, bulk storage containers, drums, totes, fueling activities, transfer operations, waste oil handling, environmental response operations, equipment maintenance, mobile equipment, temporary storage areas, and field activities with spill exposure potential.

3. REGULATORY ALIGNMENT AND REFERENCES

This program is written to align with EPA SPCC requirements, spill prevention principles, environmental protection practices, applicable client standards, and company environmental management expectations. Where client, regulatory, or site-specific requirements are more stringent, the more protective requirement shall apply.

This document is not intended to replace site-specific engineered SPCC plans where required; rather, it provides company operational expectations for field-level spill prevention, inspection, response, and continuous improvement.

4. DEFINITIONS

SPCC: Spill Prevention, Control, and Countermeasure requirements intended to prevent oil discharges into navigable waters and surrounding environments.

Secondary containment: Physical containment used to control spills and prevent uncontrolled environmental release.

Oil storage container: Any container, tank, vessel, tote, drum, equipment reservoir, or system used to store oil or petroleum products.

Transfer operation: Movement of oil or petroleum products between containers, vehicles, equipment, tanks, hoses, or process systems.

Reportable release: A spill, discharge, or uncontrolled release that requires internal notification and may require client, regulatory, or agency notification based on volume, location, material, or environmental impact.

5. SPCC HAZARD RECOGNITION

Potential SPCC hazards may include tank overfill, hose failure, transfer line leaks, containment failure, stormwater contamination, fueling spills, damaged containers, open drain valves, corrosion, equipment leaks, waste oil mismanagement, and uncontrolled discharge during operations.

Employees shall recognize that even small releases may create significant environmental impact depending on location, drainage pathway, soil conditions, nearby water, weather, and response timing. Spill prevention requires active observation before, during, and after operations.

6. PROGRAM PHILOSOPHY AND CORE PRINCIPLES

The SPCC Program is based on prevention first, rapid response second, and documented learning after every deficiency or release. Effective environmental protection requires work planning, equipment readiness, employee awareness, supervisor verification, and leadership support.

The company expects personnel to identify spill exposure before work begins, verify containment and response resources, monitor transfer activities, stop work when spill controls are inadequate, and communicate environmental concerns immediately.

Core Principle	Implementation Expectation
Prevent First	Identify spill exposure and establish controls before work begins.
Contain Early	Use secondary containment, drain protection, berms, and spill kits before release potential develops.
Monitor Transfers	Maintain communication and attention during transfer activities.
Respond Quickly	Stop the source, protect drains, contain release, and notify supervision immediately.
Learn and Improve	Use incidents, inspections, and near misses to improve equipment, procedures, training, and oversight.

7. ROLES AND RESPONSIBILITIES

Employees are responsible for recognizing spill hazards, following transfer procedures, reporting spills immediately, using spill response equipment properly, maintaining housekeeping, and stopping unsafe work.

Supervisors are responsible for ensuring inspections are completed, containment systems are maintained, spill prevention controls are implemented, transfer operations are monitored, corrective actions are tracked, and unsafe environmental conditions are corrected.

Management is responsible for providing resources, supporting environmental compliance, reviewing trends, correcting systemic deficiencies, and reinforcing that environmental protection is an operational requirement.

8. OIL STORAGE AND CONTAINMENT REQUIREMENTS

Oil storage containers shall be maintained in acceptable condition and protected from damage, corrosion, leakage, overfill conditions, vehicle impact, and environmental exposure. Storage areas shall include appropriate containment and inspection controls based on container type, location, product, and exposure potential.

Containers shall be labeled where required, compatible with stored material, secured where needed, and inspected for leaks, staining, damage, deterioration, or drainage pathway concerns.

9. SPILL PREVENTION AND CONTROL EXPECTATIONS

Spill prevention measures shall include proper transfer procedures, hose inspection, overfill prevention, containment controls, spill response equipment availability, communication, worksite monitoring, and post-task review. Supervisors shall verify adequate controls before high-risk activities such as fueling, oil transfer, tank work, hose connection, container movement, or maintenance involving petroleum products.

Spill control is most effective when employees can quickly stop the source, contain the release, protect drains and waterways, communicate the event, and initiate cleanup coordination without delay.

10. SECONDARY CONTAINMENT REQUIREMENTS

Secondary containment systems shall be maintained to contain potential releases and prevent uncontrolled environmental discharge. Containment systems shall be inspected regularly for cracks, damage, open valves, accumulated water, debris, inadequate capacity, or compromised berms.

Containment shall remain functional during storage and transfer activities. Drain valves shall remain secured unless controlled discharge or water removal has been reviewed and authorized according to company expectations.

11. TRANSFER OPERATION REQUIREMENTS

Transfer operations involving oil or petroleum products shall be planned, monitored, and controlled to minimize spill exposure. Employees shall verify hose condition, connection integrity, containment readiness, communication methods, emergency shutdown capability, weather exposure, and emergency response access before transfer begins.

Personnel shall remain attentive during active transfers unless controls are specifically designed for unattended operation and approved by supervision. Transfer activities shall be stopped immediately if leaks, pressure concerns, overflow risk, communication failures, or containment concerns develop.

Transfer Control	Field Expectation
Pre-transfer review	Verify hose condition, connection integrity, containment, weather, and communication.
During transfer	Monitor flow, pressure, container levels, hose movement, and potential leak points.
Emergency readiness	Confirm shutdown method, spill kit location, drain protection, and notification process.
Post-transfer	Inspect connection points, storage area, ground surface, and containment for leaks or residue.

12. INSPECTION AND MONITORING EXPECTATIONS

Oil storage containers, containment systems, transfer equipment, drainage systems, stormwater controls, spill kits, and environmental controls shall be inspected according to company expectations. Inspections shall identify deficiencies early enough to prevent releases or regulatory exposure.

Inspection findings shall be documented, assigned, corrected, and verified. Repeated findings shall be reviewed for systemic causes such as equipment condition, storage layout, inspection quality, employee training, or resource limitations.

13. STORMWATER AND DRAINAGE PROTECTION

Stormwater controls shall be maintained to prevent contaminated runoff, uncontrolled discharge, drain exposure, ditch contamination, soil impact, and environmental exposure during operations. Personnel shall evaluate drainage direction, low points, storm drains, berm integrity, surface condition, and weather conditions before activities with spill potential.

Drain protection, berms, absorbents, mats, temporary containment, and diversion methods shall be used where spill exposure could migrate offsite or into sensitive areas.

14. SPILL RESPONSE AND NOTIFICATION REQUIREMENTS

Spills and uncontrolled releases shall be reported immediately. Response activities shall include source control, containment, drain protection, environmental protection, communication, cleanup coordination, waste handling, and corrective action review.

Employees shall not delay notification while attempting cleanup. Early communication allows proper response resources, client notification, regulatory evaluation, and environmental protection controls to be implemented quickly.

15. ENVIRONMENTAL WORK PLANNING REQUIREMENTS

Work planning shall address spill exposure potential, containment requirements, weather conditions, environmental sensitivity, stormwater protection, equipment condition, transfer sequence, communication, and emergency response readiness.

High-risk activities shall be reviewed before work begins, including bulk transfers, fueling, tank work, maintenance involving oil systems, waste oil handling, and work near drains, waterways, stormwater pathways, or sensitive environmental areas.

16. CONTRACTOR AND THIRD-PARTY EXPECTATIONS

Contractors working on company-controlled sites are expected to comply with SPCC requirements, spill prevention expectations, transfer procedures, inspection requirements, environmental reporting expectations, and corrective action requirements. Contractors shall communicate spill hazards, maintain response equipment where required, and report releases immediately.

17. DOCUMENTATION AND RECORDKEEPING

The company shall maintain inspection records, spill response documentation, environmental assessments, corrective action records, audit documentation, training records, incident review documentation, and management review evidence. Records shall be maintained in a manner that supports internal review, client review, regulatory response, and continuous improvement.

18. INCIDENT REPORTING AND INVESTIGATION

Spills, uncontrolled releases, containment failures, transfer incidents, stormwater contamination events, equipment leaks, hose failures, or unsafe environmental conditions shall be reported immediately. Incident reviews shall identify contributing factors, equipment concerns, communication issues, work planning deficiencies, environmental conditions, and corrective actions.

Investigations shall focus on prevention and learning rather than blame, while still supporting accountability for willful disregard of environmental protection requirements.

19. STOP WORK AUTHORITY

All employees and contractors have the authority and responsibility to stop work when spill hazards exist, releases cannot be controlled, containment is inadequate, transfer controls are not verified, or serious environmental exposure exists. Stop Work Authority shall be supported by supervision and leadership without retaliation.

20. TRAINING REQUIREMENTS

Training may include spill prevention expectations, containment inspection practices, transfer operation controls, stormwater protection, spill response procedures, notification expectations, waste handling, stop work authority, and environmental reporting requirements. Supervisors shall receive additional instruction on field verification, response coordination, documentation quality, and corrective action tracking.

21. LEADERSHIP ACCOUNTABILITY

Leadership personnel shall participate visibly in the SPCC Program through field interaction, inspection review, spill prevention resource support, corrective action closure, and management review. Leadership shall ensure environmental controls are available, inspection deficiencies are corrected, response equipment is maintained, and employees are supported when stopping work for environmental protection concerns.

22. KPI AND TREND REVIEW

SPCC performance shall be reviewed using leading and lagging indicators to identify recurring spill exposure, inspection gaps, equipment deficiencies, storage concerns, and response readiness needs. Trend review shall focus on prevention, resource planning, and operational learning. Metrics may include spill events, near misses, inspection completion, containment deficiencies, corrective action closure, transfer findings, and response equipment readiness.

23. AUDITING AND CONTINUOUS IMPROVEMENT

The company shall periodically review spill prevention practices, containment conditions, transfer operations, inspection quality, corrective action completion, documentation quality, incident trends, employee feedback, and program consistency. Audit findings shall be assigned, tracked, verified, and reviewed with leadership as part of continuous improvement.

24. SUPERVISOR QUICK RESPONSE GUIDE

Situation	Immediate Action	Key Documentation / Control
Spill or leak identified	Initiate source control, containment, notification, and cleanup coordination	Spill response checklist
Containment failure identified	Stop transfer or storage activity and correct issue	Secondary containment inspection
Stormwater concern identified	Implement runoff controls and protect drainage pathways	Stormwater protection inspection
Transfer issue identified	Suspend operation until hose, connection, communication, and containment are verified	Transfer operation checklist
Oil storage deficiency identified	Correct, assign action, or remove container from service if needed	Oil storage inspection
Environmental incident occurs	Initiate reporting, investigation, and management review	Spill incident review form
Corrective action overdue	Escalate and verify interim controls	Corrective action tracking log

25. FORMS PACKAGE AND APPENDICES

The following forms are provided as editable templates for field use, supervisor verification, environmental documentation, audit support, corrective action tracking, and management review. Forms may be converted into electronic systems as long as required information is preserved.

FORM A - SPCC HAZARD ASSESSMENT FORM

Item	Details / Comments
Date	
Jobsite / Location	
Supervisor	
Oil Storage Present	
Transfer Operations Planned	
Secondary Containment Available	
Stormwater Exposure Potential	
Spill Response Equipment Available	
Drainage / Runoff Pathways Reviewed	
Environmental Sensitivity Reviewed	
Additional Controls Required	
Supervisor Approval	

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OILFIELD SERVICES

FORM B - OIL STORAGE INSPECTION CHECKLIST

Item	Details / Comments
Tank / Container condition acceptable	
Leaks not observed	
Labels visible	
Containment acceptable	
Drainage controlled	
Corrosion / damage not observed	
Overfill exposure controlled	
Access protected from impact	
Inspection documented	
Corrective actions assigned	

FORM C - SECONDARY CONTAINMENT INSPECTION FORM

Item	Details / Comments
Containment intact	
No uncontrolled discharge	
Capacity adequate	
Drain valves secured	
Accumulated water reviewed	
Debris removed	
Cracks / damage not observed	
Inspection current	
Deficiencies corrected	
Supervisor verification completed	

FORM D - SPILL RESPONSE CHECKLIST

Item	Details / Comments
Source controlled	
Personnel protected	
Containment established	
Drains / waterways protected	
Notifications completed	
Cleanup initiated	
Waste disposal coordinated	
Photos / documentation completed	
Corrective actions identified	
Management review required	

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FORM E - TRANSFER OPERATION CHECKLIST

Item	Details / Comments
Material / product identified	
Hoses inspected	
Connections secured	
Containment verified	
Communication established	
Emergency shutdown reviewed	
Spill kit available	
Weather / stormwater reviewed	
Transfer monitored	
Post-transfer inspection completed	

FORM F - STORMWATER PROTECTION INSPECTION CHECKLIST

Item	Details / Comments
Drainage pathways identified	
Storm drains protected	
Runoff controls in place	
Berms / containment functional	
No sheen or contamination observed	
Weather conditions reviewed	
Corrective actions assigned	
Follow-up completed	

FORM G - ENVIRONMENTAL EQUIPMENT INSPECTION FORM

Item	Details / Comments
Spill kit stocked	
Absorbents available	
Drain covers available	
Containment devices available	
Communication equipment available	
PPE available	
Waste containers available	
Deficiencies corrected	

FORM H - SPILL INCIDENT REVIEW FORM

Item	Details / Comments
Incident Date	
Location	
Material Released	
Estimated Quantity	
Source / Cause	
Immediate Actions Taken	
Environmental Impact Potential	
Notifications Completed	
Root / Contributing Factors	
Corrective Actions	
Management Review	

ESTVOLD
OILFIELD SERVICES

FORM I - CORRECTIVE ACTION TRACKING FORM

Item	Details / Comments
Action ID	
Deficiency / Issue	
Risk Level	
Responsible Person	
Target Completion Date	
Interim Controls	
Completion Date	
Effectiveness Verified	
Management Review	

FORM J - SPCC TRAINING ACKNOWLEDGMENT

Item	Details / Comments
Employee Name	
Training Date	
Topics Reviewed	
Spill Prevention Reviewed	
Transfer Controls Reviewed	
Spill Response Reviewed	
Stop Work Authority Reviewed	
Employee Questions Addressed	
Employee Signature	
Trainer / Supervisor Signature	

APPENDIX A - SPCC REFERENCE SUMMARY

This program is intended to support spill prevention expectations, oil containment principles, environmental protection practices, transfer operation controls, stormwater protection, and SPCC management requirements within the Estvold safety and environmental management system.

APPENDIX B - MINIMUM SPILL RESPONSE EQUIPMENT EXPECTATIONS

Equipment / Resource	Expectation
Absorbent materials	Available in quantities suitable for likely release scenarios.
Containment devices	Used to control migration and protect soil, drains, ditches, and water pathways.
Drain protection	Available where spills may reach storm drains or drainage routes.
Spill kits	Inspected and restocked following use or deficiency identification.
PPE	Selected based on material, exposure potential, SDS guidance, and response activity.
Communication equipment	Available for immediate supervisor, client, and emergency notification.

APPENDIX C - TRANSFER OPERATION EXPECTATIONS

- Inspect hoses, fittings, valves, and connection points before transfer begins.
- Verify containment, spill kit availability, communication, and emergency shutdown method.
- Monitor active transfers and stop immediately if leaks, overflow risk, or communication failures occur.
- Protect drains and stormwater pathways before transfer in exposed areas.
- Inspect the area after transfer and document deficiencies or corrective actions.