ESTVOLD OILFIELD SERVICES

STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

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Title: SWPPP Policy
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Owner: HSE Department

Policy Control Item	Policy Information
Company	Estvold Oilfield Services
Document Type	Policy / Field Forms / SWPPP and Environmental Audit Package
Applies To	All construction sites, yards, staging areas, disturbed ground activities, customer sites, and field operations with stormwater exposure potential
Program Intent	Stormwater protection, erosion prevention, sediment control, environmental compliance, spill prevention, and continuous improvement
Regulatory Alignment	EPA stormwater expectations, SWPPP requirements, erosion control principles, environmental protection expectations
Revision	Comprehensive V2 - Editable Master
Approval	Management / HSE / Operations

INCLUDED IN THIS PACKAGE

- Policy manual
- Supervisor quick response guide
- SWPPP hazard assessment form
- Stormwater inspection checklist
- Erosion and sediment control inspection form
- Stormwater corrective action tracking form
- Environmental audit and observation form
- Rain event inspection log
- Stormwater discharge observation form
- Site stabilization checklist
- Spill prevention inspection form
- Environmental closeout review form

DOCUMENT CONTROL

Revision	Date	Description of Change	Approved By
0	Initial Release	Original controlled document issue	Management
1	Current Draft	Expanded SWPPP manual and forms package	Management
2	Current Revision	BBS master format clone with full management-system depth and SWPPP subject matter	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 document repository, 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, client-required safety documentation platforms, and designated personnel responsible for stormwater protection, erosion control, inspections, corrective actions, and environmental compliance support.

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, stormwater inspection review, rain event response, erosion control evaluation, corrective action tracking, environmental communication, and audit support. Supervisors shall use the program as a field execution tool, not merely as a policy statement.

HOW TO USE THIS MANUAL

- Use Sections 1 through 25 as the governing SWPPP program standard.
- Use the forms package during field planning, inspections, rain event reviews, deficiency tracking, and closeout activities.
- Review corrective actions and repeat stormwater deficiencies during management or HSE review meetings.
- Use the Supervisor Quick Response Guide when immediate decisions are needed in the field.
- Use appendices as practical reference guidance for environmental controls, inspections, and stabilization expectations.

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1. Purpose and Policy Statement

Estvold Oilfield Services is committed to protecting stormwater systems, surrounding environments, waterways, employees, contractors, visitors, client representatives, and communities from environmental impacts associated with construction activities, disturbed ground operations, staging areas, and stormwater runoff. Stormwater protection is a core operational responsibility and must be planned before work begins, monitored during changing conditions, and corrected promptly when deficiencies are identified.

Stormwater pollution may result from uncontrolled runoff, erosion, sediment migration, spills, poor housekeeping, improper material storage, inadequate drainage protection, or failure to maintain environmental controls. This program establishes a management-system framework for stormwater protection, erosion control, sediment control, material storage, inspection activities, corrective action management, and continuous improvement.

No production expectation, operational pressure, schedule requirement, 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, and company-controlled worksites involving stormwater exposure potential. It applies to construction sites, disturbed ground activities, staging areas, storage yards, excavation activities, material handling operations, environmental response activities, and field operations where stormwater runoff may contact soil, fuel, oil, chemicals, waste, or other potential contaminants.

The program is intended for both routine and non-routine operations. It shall be used during planning, mobilization, daily field execution, rain event response, inspection activities, corrective action follow-up, demobilization, and site closeout.

3. Regulatory Alignment and References

This program is written to align with EPA stormwater expectations, SWPPP requirements, erosion and sediment control principles, environmental protection expectations, applicable client standards, and company environmental management expectations. Where regulatory, client, site-specific, or company requirements differ, the more protective requirement shall be followed unless otherwise directed by authorized management or regulatory authority.

4. Definitions

The following definitions support consistent interpretation and field application of this program. These definitions are intended to assist supervisors and employees with practical implementation and do not replace regulatory definitions where a specific regulatory requirement applies.

- SWPPP: Stormwater Pollution Prevention Plan used to identify controls intended to minimize stormwater contamination from construction, disturbed ground, material storage, and operational activities.
- Erosion Control: Methods used to reduce soil movement caused by wind, water, vehicle traffic, drainage patterns, or disturbed ground conditions.
- Sediment Control: Measures used to prevent sediment from leaving a worksite, entering drainage systems, or impacting surrounding property and waterways.
- Best Management Practice (BMP): A physical control, work practice, inspection method, or administrative process used to reduce stormwater pollution potential.
- Corrective Action: Action taken to correct deficiencies, damaged controls, uncontrolled runoff, sediment migration, housekeeping concerns, or other stormwater protection issues.

5. Stormwater Hazard Recognition

Stormwater hazards may develop quickly when rain, snowmelt, disturbed ground, material storage, vehicle traffic, or poor drainage conditions interact with a worksite. Employees shall recognize that stormwater pollution can occur even during short-duration tasks and may not always be obvious until runoff begins to move across the site.

Potential stormwater hazards include:

- Soil erosion from disturbed ground, slopes, stockpiles, traffic areas, or unstabilized work areas.
- Sediment migration into streets, drainage ditches, culverts, storm drains, neighboring properties, or waterways.
- Runoff contamination from oils, fuels, chemicals, wastes, equipment leaks, washout activities, or poor housekeeping.
- Damaged, missing, overwhelmed, or improperly installed erosion and sediment controls.
- Uncontrolled discharge caused by rain events, snowmelt, drainage diversion, or blocked flow paths.
- Material storage exposure from uncovered containers, poor containment, unsecured waste, or inadequate spill prevention controls.

6. Program Philosophy and Core Principles

The Estvold SWPPP program is based on proactive environmental planning rather than reactive cleanup. Stormwater protection must be integrated into job planning, site setup, daily work execution, inspection routines, and closeout activities. Supervisors and employees are expected to identify environmental exposure before runoff occurs, maintain controls during changing conditions, and correct deficiencies promptly.

The program is built around the following core principles:

- Prevent stormwater pollution at the source whenever practical.
- Install and maintain erosion and sediment controls before exposure occurs.
- Inspect controls routinely and after rain events or changing conditions.
- Correct deficiencies promptly and document corrective actions clearly.
- Communicate stormwater concerns to affected employees, contractors, clients, and supervision.
- Use Stop Work Authority when runoff, erosion, sediment migration, or environmental exposure cannot be controlled.

7. Roles and Responsibilities

Successful SWPPP execution requires shared responsibility between employees, supervisors, management, contractors, and environmental support personnel. Accountability shall include planning, communication, field control implementation, inspection, corrective action completion, and documentation quality.

Role	Primary Expectations
Employees	Recognize stormwater hazards, maintain housekeeping, follow environmental controls, report deficiencies, and stop work when runoff or environmental exposure cannot be controlled.
Supervisors	Plan work, verify controls, conduct inspections, coordinate corrective actions, communicate expectations, and ensure documentation is completed.
HSE / Environmental Support	Support program administration, review trends, assist with audits, provide technical guidance, and support regulatory or client documentation needs.
Management	Provide resources, support corrective action closure, review performance, and reinforce environmental protection expectations.
Contractors	Comply with SWPPP expectations, maintain controls within their scope, report deficiencies, and participate in inspections or corrective actions when required.

8. SWPPP Planning Requirements

SWPPP planning shall be completed before work begins when stormwater exposure potential exists. Planning shall address site drainage, disturbed ground, erosion potential, sediment control needs, material storage, spill prevention, inspection frequency, corrective action ownership, and site stabilization requirements.

Planning activities should evaluate both routine operating conditions and foreseeable upset conditions such as rain events, snowmelt, drainage failures, vehicle track-out, high winds, and material handling changes.

- Identify drainage patterns, runoff direction, discharge points, and sensitive environmental receptors.
- Determine erosion and sediment control requirements before ground disturbance begins.
- Review material storage, fueling, chemical storage, waste handling, and spill prevention needs.
- Identify inspection requirements, rain event response expectations, and corrective action ownership.
- Confirm controls are installed, functional, and communicated before exposed work begins.

Planning Element	Field Expectation
Drainage and discharge points	Identify runoff direction, discharge points, drainage pathways, and sensitive receptors before work begins.
Disturbed ground	Determine exposure from excavation, grading, traffic, stockpiles, and staging.
Controls and BMPs	Select controls appropriate to site conditions and install before exposure occurs where practical.
Material storage	Review chemicals, fuels, waste, equipment, and other stored materials for stormwater exposure.
Inspection plan	Establish inspection frequency, rain event triggers, documentation expectations, and corrective action ownership.

9. Erosion and Sediment Control Expectations

Erosion and sediment controls shall be selected, installed, maintained, and inspected based on worksite conditions, soil disturbance, slope, drainage direction, weather exposure, and potential environmental impact. Controls shall be maintained in functional condition and corrected when damaged, displaced, overwhelmed, or ineffective.

- Potential controls may include silt fence, wattles, berms, stabilized entrances, sediment basins, inlet protection, rock checks, vegetation, matting, surface stabilization, and drainage protection.
- Controls shall be installed before exposure occurs where practical and adjusted when work conditions change.
- Sediment accumulation shall be removed when it reduces control effectiveness or creates potential for discharge.
- Damaged controls shall be repaired or replaced promptly.

10. Stormwater Runoff Management Requirements

Stormwater runoff shall be managed to minimize uncontrolled discharge, sediment migration, contamination, and offsite environmental impact. Supervisors shall evaluate runoff pathways and ensure controls are appropriate for site conditions and expected weather exposure.

- Maintain drainage pathways to prevent uncontrolled pooling, erosion, or bypass of controls.
- Prevent runoff from contacting oils, fuels, chemicals, waste materials, or contaminated soil.
- Use diversion or containment controls where necessary to direct runoff away from contamination sources.
- Reassess runoff controls after rain events, snowmelt, site grading changes, or work sequencing changes.

11. Material Storage and Housekeeping Expectations

Materials, waste, chemicals, fuels, equipment, and temporary storage areas shall be managed to prevent stormwater contamination. Poor housekeeping is a leading contributor to stormwater deficiencies because loose materials, debris, sediment, and containers can be mobilized during precipitation or runoff events.

- Store materials in designated areas away from drainage pathways where practical.
- Maintain covers, containment, labels, and securement for containers and waste materials.
- Remove loose debris, trash, scrap, sediment, and unused materials from work areas routinely.
- Maintain access routes, staging areas, and storage areas in an organized condition.
- Correct leaks, spills, or container deficiencies immediately.

12. Spill Prevention and Environmental Protection Requirements

Spill prevention measures shall be incorporated into SWPPP planning and daily work execution. Fueling, maintenance, chemical storage, equipment staging, and waste handling activities shall be evaluated for potential stormwater impact. Spill response supplies shall be available when spill exposure potential exists.

- Inspect equipment for leaks before use and during operations where practical.
- Maintain spill kits, absorbent materials, drain protection, containment devices, and emergency communication methods.
- Control fueling, transfer, and maintenance activities to prevent uncontrolled release.
- Report spills immediately and initiate containment, source control, cleanup coordination, and corrective action review.

13. Inspection and Monitoring Expectations

Stormwater controls, erosion controls, sediment controls, drainage systems, material storage areas, fueling areas, waste areas, and environmental protection measures shall be inspected regularly according to company, client, and regulatory expectations. Inspections shall be documented and deficiencies shall be tracked to closure.

- Inspect active controls before major work shifts when conditions warrant.
- Inspect controls after rain events, snowmelt, high winds, or site changes that may affect runoff.
- Document deficiencies, assigned corrective actions, responsible persons, due dates, and completion verification.
- Use inspection trends to identify repeat deficiencies and improvement opportunities.

Inspection Trigger	Minimum Review Expectations
Initial setup	Verify controls are installed before exposed work begins.
Routine inspection	Evaluate controls, drainage, storage areas, housekeeping, and deficiencies.
Rain event	Inspect runoff paths, erosion, sediment controls, discharge points, and material exposure.
Changed conditions	Reassess controls after grading, excavation, staging, traffic route changes, or weather changes.
Closeout	Verify stabilization, cleanup, remaining controls, and final documentation.

14. Rain Event Response Expectations

Rain events shall be treated as operational triggers for reassessment. Supervisors shall evaluate whether existing controls remain effective, whether sediment has moved, whether runoff is bypassing controls, and whether additional stabilization or containment is required. Rain event response shall include both immediate field correction and documentation where required.

- Inspect drainage pathways, discharge points, erosion controls, sediment controls, and material storage areas.
- Identify sediment movement, ponding, washouts, damaged controls, or uncontrolled runoff.
- Implement immediate controls when active runoff or environmental exposure is observed.
- Document deficiencies and corrective actions using the rain event inspection log or equivalent form.

15. Site Stabilization and Restoration Requirements

Disturbed areas shall be stabilized and restored as required to minimize erosion, runoff exposure, sediment migration, dust generation, and environmental impact. Stabilization requirements may vary based on site conditions, project duration, client expectations, and regulatory requirements.

- Stabilize exposed soil as soon as practical when work is complete or when areas will remain inactive.
- Use appropriate stabilization methods such as compaction, gravel, vegetation, erosion control matting, mulch, or other approved controls.
- Verify final stabilization and closeout controls before demobilization where applicable.
- Document closeout review and remaining corrective actions.

16. Environmental Work Planning Requirements

Environmental work planning shall address stormwater exposure potential, environmental sensitivity, weather forecast, site access, material storage, spill prevention, emergency response readiness, and communication expectations. Planning shall occur before work begins and shall be revisited when work conditions change.

17. Contractor and Third-Party Expectations

Contractors working on company-controlled sites are expected to comply with SWPPP requirements, environmental protection expectations, erosion and sediment control requirements, spill prevention expectations, reporting requirements, and corrective action expectations. Contractors shall communicate observed deficiencies and shall not bypass environmental controls without authorization.

18. Documentation and Recordkeeping

The company shall maintain SWPPP documentation, inspection records, stormwater monitoring logs, rain event inspection records, corrective action records, environmental incident documentation, audit records, training records, and closeout documentation according to company, client, and regulatory expectations. Documentation shall be accurate, legible, complete, and available for review when required.

19. Incident Reporting and Investigation

Stormwater releases, erosion failures, sediment migration, uncontrolled runoff, spill impacts, environmental incidents, damaged controls, or unsafe environmental conditions shall be reported immediately. Incident reviews shall identify contributing factors, environmental controls, communication issues, work planning concerns, inspection effectiveness, and corrective actions required to prevent recurrence.

20. Stop Work Authority

All employees and contractors have the authority and responsibility to stop work when stormwater hazards exist, runoff cannot be controlled, environmental exposure is occurring, controls have failed, or serious environmental impact may occur. Work shall not resume until hazards are reassessed, corrective actions are implemented, and affected personnel are informed of revised controls.

21. Training Requirements

Training shall support employee understanding of stormwater protection expectations, erosion and sediment controls, spill prevention, environmental hazard recognition, inspection expectations, documentation requirements, stop work authority, and reporting procedures. Training may be provided through orientation, field coaching, safety meetings, formal classes, client-specific training, and task-specific briefings.

22. Leadership Accountability

Leadership accountability is demonstrated through visible support for environmental protection, timely corrective action closure, adequate resources for controls, review of inspection quality, and reinforcement of expectations. Supervisors and managers shall model the expectation that stormwater protection is an operational requirement, not an optional administrative task.

Leadership Activity	Expected Evidence
Field engagement	Supervisor or manager reviews SWPPP conditions and discusses expectations with crews.
Resource support	Controls, spill kits, materials, labor, and time are provided to correct deficiencies.
Corrective action ownership	Open actions have responsible persons, due dates, closure verification, and escalation when needed.
Trend review	Repeat findings and stormwater issues are reviewed for systemic improvement.
Employee support	Employees are supported when raising concerns or exercising Stop Work Authority.

23. KPI and Trend Review

The SWPPP program shall be reviewed using leading and lagging indicators to identify recurring deficiencies, inspection quality concerns, corrective action delays, environmental exposure trends, and training opportunities. Trend review should be used to improve controls and reduce repeat findings.

Metric	Purpose	Review Frequency
Stormwater Inspection Completion	Verifies required inspections are completed according to expectations.	Weekly / per project requirement
Rain Event Response Completion	Confirms inspections and corrective actions occur after qualifying weather events.	After rain event
Corrective Action Closure	Measures whether deficiencies are corrected on time and verified.	Monthly
Repeat Deficiency Rate	Identifies recurring erosion, sediment, housekeeping, or drainage issues.	Monthly / quarterly
Spill Prevention Readiness	Evaluates spill kit, containment, storage, and response readiness.	Monthly
Training Completion	Confirms affected personnel understand SWPPP requirements.	Annual / onboarding

24. Auditing and Continuous Improvement

The company shall periodically review stormwater controls, erosion and sediment control effectiveness, inspection completion, corrective action completion, documentation quality, environmental incident trends, employee feedback, contractor performance, and program consistency. Audit findings shall be tracked through corrective action management and reviewed for systemic improvement opportunities.

Audit Focus Area	What Good Looks Like
SWPPP Planning	Site drainage, disturbed ground, discharge points, controls, material storage, spill prevention, and inspection requirements reviewed before work begins.
Field Controls	Erosion controls, sediment controls, stabilization, drainage protection, and housekeeping are installed and maintained.
Inspection Quality	Forms are complete, deficiencies are specific, corrective actions are assigned, and closure is verified.
Rain Event Response	Rain event inspections occur promptly and control failures are corrected.
Corrective Action Management	Open items are tracked, escalated when overdue, and verified after completion.

25. Supervisor Quick Response Guide

The following quick response guide is intended to support field decision-making when stormwater concerns, control failures, runoff issues, or environmental exposure conditions are identified. It does not replace the need for supervisor judgment, HSE involvement, client communication, or regulatory reporting where required

Situation	Immediate Action	Key Documentation / Control
Stormwater runoff concern identified	Stop affected activity when needed, evaluate runoff direction, and implement runoff controls.	SWPPP hazard assessment / corrective action form
Erosion control failure identified	Repair, replace, or reinforce controls immediately.	Stormwater inspection checklist
Sediment migration observed	Contain sediment, stabilize affected area, and prevent offsite movement.	Corrective action tracking form
Rain event creates exposure	Inspect drainage, controls, discharge points, and material storage areas.	Rain event inspection log
Spill or release occurs	Initiate containment, stop source, notify supervision, and coordinate cleanup.	Spill response checklist / incident review
Environmental incident occurs	Stop work if needed, protect drains or waterways, notify management/HSE, and initiate review.	Environmental incident review form

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26. FORMS PACKAGE

The following forms are provided as editable templates. The company may convert these forms into electronic format, fillable PDF, shared drive logs, or safety management software entries as needed. Forms should be completed accurately and retained according to company document control expectations.

FORM A - SWPPP HAZARD ASSESSMENT FORM

Item	Details / Comments / Verification
Date	
Jobsite / Location	
Supervisor	
Disturbed Ground Activity	
Stormwater Exposure Potential	
Erosion Controls Installed	
Sediment Controls Installed	
Drainage Concerns Identified	
Spill Prevention Measures Available	
Material Storage Reviewed	
Additional Controls Required	
Supervisor Review / Signature	

FORM B - STORMWATER INSPECTION CHECKLIST

Item	Details / Comments / Verification
Erosion controls acceptable	
Sediment controls functioning	
Drainage pathways clear	
Stormwater discharge controlled	
Material storage acceptable	
Housekeeping acceptable	
Spill prevention equipment available	
Deficiencies documented	
Corrective actions assigned	
Follow-up completed	

FORM C - EROSION AND SEDIMENT CONTROL INSPECTION FORM

Item	Details / Comments / Verification
Silt fence / wattles installed correctly	
Controls free of damage	
Sediment accumulation acceptable	
Stabilized entrance maintained	
Slope or disturbed area protected	
Discharge points protected	
Controls repaired where needed	
Inspector comments	

FORM D - RAIN EVENT INSPECTION LOG

Item	Details / Comments / Verification
Date	
Rain Event / Weather Condition	
Inspection Completed By	
Controls Inspected	
Deficiencies Identified	
Immediate Actions Taken	
Corrective Actions Required	
Completion Verification	

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FORM E - STORMWATER DISCHARGE OBSERVATION FORM

Item	Details / Comments / Verification
Observation Date / Time	
Discharge Location	
Runoff Condition	
Sediment Observed	
Oil Sheen / Contamination Observed	
Corrective Actions Required	
Notifications Completed	
Supervisor Review	

FORM F - SITE STABILIZATION CHECKLIST

Item	Details / Comments / Verification
Disturbed areas stabilized	
Temporary controls removed or maintained	
Final drainage acceptable	
Sediment removed	
Material storage cleared	
Waste removed	
Closeout deficiencies identified	
Final supervisor review	

FORM G - SPILL PREVENTION INSPECTION FORM

Item	Details / Comments / Verification
Spill kits available	
Fuel / oil containers secure	
Secondary containment acceptable	
Equipment leaks not observed	
Drain protection available	
Transfer areas reviewed	
Corrective actions required	

FORM H - STORMWATER CORRECTIVE ACTION TRACKING FORM

Item	Details / Comments / Verification
Action ID	
Deficiency Identified	
Location	
Responsible Person	
Due Date	
Interim Controls	
Completion Date	
Verified By	
Status	

FORM I - ENVIRONMENTAL AUDIT AND OBSERVATION FORM

Item	Details / Comments / Verification
Audit Date	
Location	
Controls Observed	
Employee / Contractor Interaction	
Positive Practices	
Deficiencies	
Corrective Actions	
Reviewer	

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FORM J - ENVIRONMENTAL CLOSEOUT REVIEW FORM

Item	Details / Comments / Verification
Project / Site	
Final Inspection Date	
Controls Removed or Stabilized	
Waste Removed	
Drainage Restored	
Outstanding Items	
Client / Supervisor Review	
Closeout Approved	

Appendix A - SWPPP Reference Summary

This program is intended to support stormwater protection expectations, erosion control practices, runoff management principles, spill prevention, environmental compliance, and continuous improvement. SWPPP controls shall be selected based on site conditions, environmental sensitivity, drainage patterns, work scope, and applicable regulatory or client expectations.

Appendix B - Minimum Environmental Control Expectations

Minimum environmental controls may include silt fence, wattles, berms, stabilized entrances, sediment basins, inlet protection, containment systems, drainage protection, spill kits, waste controls, housekeeping practices, material storage controls, stormwater monitoring, and corrective action tracking.

Appendix C - Stormwater Inspection Expectations

Stormwater inspections should include runoff evaluation, erosion control review, sediment migration monitoring, material storage review, drainage condition assessment, housekeeping verification, spill prevention readiness, rain event response, corrective action tracking, and documented supervision expectations.

Program Review and Approval

Review Area	Name / Title	Date	Signature
Operations Review			
HSE Review			
Management Approval			