

POLICY

Hawk Energy, LLC has adopted this policy to inform employees of the Spill Prevention and Response Policy, ensuring the safety and health of the employees.

David Slim is responsible for ensuring that this policy is enforced.

STORAGE

It is the policy of Hawk Energy, LLC that all chemical substances will be stored in the proper containers to minimize the potential for a spill. Whenever possible, chemicals will be kept in closed containers and stored so they are not exposed to storm water.

SUBSTANCE IDENTIFICATION

Hawk Energy, LLC will ensure all chemicals used that may be potentially spilled or released are kept on the “List of Chemicals with Potential Spill or Release” list provided on page four (4) of this policy. The list will consist of both liquid chemicals used at the facilities of Hawk Energy, LLC or brought onto the sites of the owner client.

As part of the risk identification and assessment plan, a material inventory identifying hazardous substances and toxic chemicals will be maintained to determine the potential for spills.

SPILL KITS

It is the policy of Hawk Energy, LLC that spill kits will contain the appropriate supplies for the materials that may be spilled. The supplies will be easily accessible when required and considerations will be made for both the type and quantity of materials. Spill kits will include, but are not limited to, at least the following:

10 white absorbents for oil	Vermiculite or other absorbent
10 gray absorbents for all chemical spills	Broom and pan
Plastic bags with waste labels	Personal protective equipment (PPE) such as gloves, goggles, or dust/mist mask
Six (6) gallons empty recovery drum	

Hawk Energy, LLC will provide spill kits and proper spill response materials based on the substances and quantity of the potential spills.

TRAINING

It is the policy of Hawk Energy, LLC that all employees will be trained on the process and materials they will be working with, the potential safety hazards and the practices and procedures on how to prevent or respond properly in the event of a toxic or hazardous spill incident. Specifically, company employees will be trained on the appropriate procedures to be followed in the event of a spill – including access to the materials available for use, proper waste disposal, and the communication procedures the company utilizes.

SAFE PRACTICES

At all times, there will be one (1) person on-call (and available to respond to an emergency), who will be responsible for coordinating all hazardous waste emergency response measures.

This individual will be designated the On-Scene Coordinator and will have the authority to mobilize all resources necessary to carry out procedures outlined in the plan. He or she will know all hazardous waste generating operations and activities at the location, characteristics of hazardous waste, the location of records and the location of all emergency response and spill cleanup and control equipment.

In the event of a hazardous waste release, the On-Scene Coordinator, or an alternate, will be contacted immediately. A mobile communication system (i.e., telephone, radio, walkie-talkie, or cellular phone) will be available near the storage locations during transfer operations.

The On-Scene Coordinator will be informed of the nature and location of the spill and will direct the resources of manpower and equipment for the spill response action. The On-Scene Coordinator will remain in control for the duration of the response.

The Need for Outside Support (Larger Spills): The On-Scene Coordinator, or individual directed by the On-Scene Coordinator, will make the necessary contact with outside support and regulatory agencies.

Spill Events: In the event of an incident involving a large spill greater than one (1) gallon of hazardous material or one (1) pint of acutely hazardous):

1. Alert the On-Scene Coordinator.
2. The On-Scene Coordinator will immediately notify the Environmental Health and Safety Department.
3. The On-Scene Coordinator will summon additional assistance, if necessary (local or state emergency response teams, fire departments, etc.).
4. The On-scene coordinator will obtain the material safety data sheet (SDS) to determine the hazards and appropriate response activities. The SDS will be provided to emergency responders.

PPE

1. Determine the exact source of the leak or spill, the amount and the area affected by the release.
2. After putting on PPE and after assessing the nature of the hazards and hazardous chemicals, remedy and stop the point source spill, if it is safe to do so.
3. Stop the spill with standard industrial absorbent.
4. Take the necessary action to keep the spill from spreading.
5. Spread absorbent to surround and absorb the spilled material.
6. Collect contaminated material (absorbent, rags, disposal suits, etc.) into a recovery drum and label for proper disposal.

DISPOSAL OF SPILL MATERIALS

Oil Spill Waste

Oil Spill Waste will be cleaned up using spill absorbent material and drummed for off-site disposal. Free liquid will be pumped into UN-approved 30 or 55-gallon drums. The UTPA Environmental Protection Division, using an approved UT System Vendor, will dispose of the generated waste.

Hazardous Waste Releases

The On-Scene Coordinator will, immediately after an emergency, provide for the treatment, storage, or disposal of recovered waste, contaminated soil or surface water, or any other material that results from a fire, explosion, or other release at the facility.

HOUSEKEEPING

It is the policy of Hawk Energy, LLC that areas where chemicals may be used or stored will be maintained using good housekeeping best management practices. This includes, but is not limited to:

- Organized, closed and clean storage containers
- Placement away from potential receiving waters
- Correct labeling
- Use of secondary containment where necessary
- Immediate removal of any spillage

COMMUNICATION MEASURES

In the event of any spill, the appropriate employee will be contacted to initiate immediate action, proper reports will be written for review and evaluation by management and any governmental and environmental agencies need to be notified by law will be informed.

Emergency contact numbers will be posted at telephones located throughout the facility.

The following information will be provided when reporting a spill:

- Identity of the caller
- Contact phone number
- Location of the spill
- Type of product spilled
- Quantity spilled
- Extent of actual and/or potential water pollution
- Date and time of spill
- Cause of spill

