

QP Energy Services LLC
Hazardous Substance Spill Response Program

HSE Manual Section 6

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It will outline the emergency action plan as well as the roles employees are expected to take on. The policy is in place to keep QP Energy Services LLC's staff safe, but also to prevent environmental contamination and help comply with OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) standard.

After reading this policy, employees will understand:

- How to identify a hazardous substance spill or release
- What immediate actions he/she should take
- How his/her actions fit within the larger scope of QP Energy Services LLC's emergency response plan

2.0 Scope

This policy applies to all QP Energy Services LLC employees who have the possibility of witnessing or accidentally causing a hazardous substance spill or release.

3.0 POLICY GUIDELINES

3.1 What Qualifies as an Emergency Spill

Not all spills are necessarily emergencies even if they involve hazardous substances. Incidental releases are spills that do not pose immediate or short-term safety/health hazards to employees in the vicinity or to those cleaning it up. However, the following will always constitute emergency situations and require adherence to QP Energy Services LLC's emergency response plan:

- The presence of high concentrations of toxic substance, whether because of a spill or leak
- Any situation involving hazardous substances that could cause injury or be life threatening
- The presence of environments that present imminent danger to life and health (IDLH situations)
- Accidents that result in an oxygen-deficient atmosphere
- Conditions that pose a fire or explosion hazard
- Any situation that requires evacuation of an area or that requires immediate attention because of the danger posed to employees in that area

3.2 What Qualifies as a Hazardous Substance

Each employee and contractor performing work for QP Energy Services LLC will know what a hazardous substance is. The employee will understand that a hazardous substance, according to OSHA's HAZWOPER standard, is:

- Intended to encompass those substances deemed hazardous by the U.S. Environmental Protection Agency (EPA) and the U.S. Department of Transportation (DOT)
- A biological agent or any other disease-causing agent
- Able to cause, or reasonably anticipated/expected to cause after release into the

environment, death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions or physiological deformations in people or their offspring upon exposure, ingestion, inhalation and/or assimilation

- Released by deposit, injection, dumping, spilling, leaking or placing near a site where the substance could feasibly enter the environment. It could enter the environment by being emitted into the air or discharged into any water, including groundwater.

3.3 How Hazardous Substance Will Be Identified

Each employee and contractor performing work for QP Energy Services LLC will understand how to identify a hazardous substance and:

- Use QP Energy Services LLC's labeling system and Safety Data Sheets (SDS) to recognize a hazardous substance emergency
- Assess the potential outcomes associated with the hazardous substance emergency
- Have the ability to realize the need for additional resources and make appropriate notifications

4.0 INDIVIDUAL EMPLOYEE ROLES

4.1 First Responder Awareness Level

Individuals who are likely to witness a hazardous substance release but whose only responsibility is to notify the proper authorities must demonstrate the following:

- Knowledge of hazardous substance risks, how they should be handled and the potential outcomes associated with the situation
- The ability to specifically identify the hazardous substances, if possible

4.2 First Responder Operations Level(QP Field Service Technicians)

Individuals who have the responsibility of responding to hazardous substance releases for the purpose of protecting nearby people, property or environment from damage must demonstrate the following:

- Understanding and knowledge of all requirements of the First Responder Awareness Level
- Knowledge of QP Energy Services LLC's emergency response plan and how to implement it
- Knowledge of hazard and risk assessment
- Knowledge of proper personal protective equipment (PPE) appropriate for the situation and how to use it
- Ability to classify, identify and verify known and unknown materials by using survey equipment
- Knowledge of basic control, containment and/or confinement operations
- Knowledge of basic chemical and toxicological terminology/behavior

4.3 Hazardous Materials Technician

Members of the Hazardous Materials (hazmat) Team, who respond to releases with the purpose of actively and aggressively stopping them by patching, plugging or otherwise impeding, must demonstrate the following:

- Understanding and knowledge of all requirements of the Hazardous Materials Technician Level
- Understanding of the local, state and federal emergency response plans
- Ability to classify, identify and verify known and unknown materials using advanced survey equipment
- The ability to perform advanced control, containment and/or confinement operations with the resources and PPE available
- Ability to implement decontamination procedures
- Advanced knowledge of chemical, radiological and toxicological terminology and behavior

4.4 On-Scene Incident Commander

Member of the hazmat team who assume control of the incident site in case of an emergency must demonstrate the following:

- Ability to implement QP Energy Services LLC's incident command system
- Ability to implement QP Energy Services LLC's emergency response plan
- Understanding of the hazards and risks associated with employees working in chemical protective clothing
- Understanding of the importance of decontamination procedures

5.0 Training

Each level of employee will be properly trained for at least the time specified in the HAZWOPER standard.

Additional training will be provided until each employee understands and is able to demonstrate the knowledge required for his or her position.

Training shall be provided not only for employees, but also QP Energy Services LLC's contractors who have the reasonable possibility of being present during a hazardous chemical release or spill.

Staff will receive additional, refresher training on these roles and responsibilities annually.

6.0 EMERGENCY RESPONSE PLAN

6.1 Incidental Spills

In the event a spill presents no immediate danger to the health and safety of employees or the environment:

- Inform those in the immediate area that a spill has occurred.

- If the chemical is flammable, eliminate any possible sources of ignition that may be in the area.
- If anyone has come into direct contact with the chemical, a trained first responder must be contacted to assess the individual.
- Determine what personal protective equipment is required to handle the hazardous material using the appropriate Safety Data Sheet (SDS).
- Follow the cleanup and control methods listed in the appropriate SDS.
- Make sure the area is completely decontaminated before work in that location resumes.
- Notify your immediate supervisor of the incident so he may report it to the QP General Manager.

6.2 Unknown Material Spills or Large spills

If a spill is very large or if the exact makeup or effects of the spilled chemical are unknown:

- Immediately inform those in the area that a spill has occurred and that they must evacuate.
- If the chemical is flammable, or if you are unsure whether or not it is flammable, eliminate any possible sources of ignition that may be in the area.
- Leave any containers in the area to aid the first responder or hazmat Team in identifying the spill.
- Close all doors to that area to keep the spill as contained as possible.
- Activate the building's fire alarm.
- Notify the QP General Manager so that the appropriate assistance can be dispatched.
- Do not attempt to clean up the spill yourself; wait until the first responders arrive to assess the situation.
- If the first responders determine that the severity of the spill goes beyond their containment abilities they will contact the Hazmat Team.

6.3 Spills Creating an Immediate Health Threat

In the event a spill creates an immediate health threat to employees, patrons, visitors or any other witnesses in the area:

- Evacuate the area immediately.
- Leave everything in place and close all doors on the way out to isolate the area.
- Activate the building's fire alarm.
- Once clear of the affected area, immediately notify the QP General Manager of

the situation so that the appropriate assistance can be dispatched.

- Wait in a safe area near the entrance to the building until the Hazmat Team arrives so you can explain the details of the situation.

7.0 Reporting

Under federal law, a report must be filed with the National Response Center (NRC) whenever the spill exceeds the established Superfund Reportable Quantity. Report all spills to the QP General Manger so that NRC may be contacted, if necessary.

8.0 Employee Knowledge

Both QP Energy Services LLC employees and hired contractors working with the reasonable possibility of being around a hazardous chemical release will be made aware of the HAZWOPER emergency response plan and understand each of its parts, which include vital information on:

- Pre-emergency planning, including recognition and prevention
- Personnel roles, lines of authority, training and communication standards
- Safe distances and places of refuge in case of emergency
- Site security and control standards
- Evacuation routes and procedures
- Decontamination procedures
- Emergency medical treatment and first aid procedures
- Emergency alerting and response procedures

9.0 Revision History Record:

Revision Number	Section	Revised By	Description
0	NA	NA	Original document.
