

# Environmental Audits – Offshore Seismic Operations, Refineries and Service Stations







## ARPEL Reference Manual

## Environmental Audits – Offshore Seismic Operations, Refineries and Service Stations

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#### Disclaimer

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#### Warning to Users

This document contains a description of standard environmental auditing procedures, including information on audit planning, execution, reporting, and follow up. The appendices to the document contain audit checklists that were prepared to be used for audits of PCJ's refinery, service station/storage facilities, and offshore seismic operations. However, the core document, checklists and other audit tools can be used by other oil and gas companies although they should be adapted to their specific –local- regulatory framework and/or corporate procedures.



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#### 1.0 Introduction

The document contains a description of standard environmental auditing procedures, including information on audit planning, execution, reporting, and follow up. The appendices to the document contain audit checklists that –although developed for PCJ's refinery, service station/storage facilities, and offshore seismic operations- can be adapted for their use by other companies ("the users") with that type of operations. The appendices also contain forms that can be used by the audit teams. The checklists and other audit tools can and should be modified and updated by the users as their audit programs progress.

The audit planning and execution information is based on ISO 19011, *Guidelines for quality and/or environmental management systems auditing* (International Organization for Standardization, 2002), and on CSA Z773-03, *Environmental Compliance Auditing* (Canadian Standards Association, 2003).

The overall audit process is shown in Figure 1.

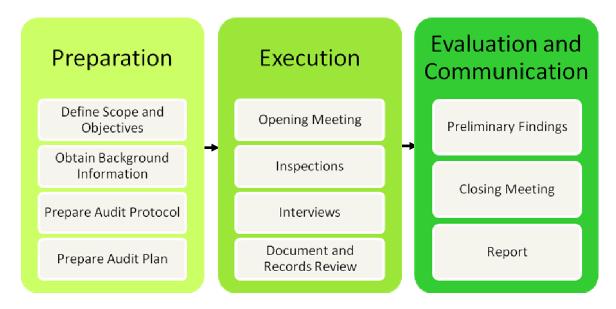


Figure 1- Overall Audit Process

#### 1.1 Principles of Auditing

The principles of auditing are shown in Figure 2 and described below.

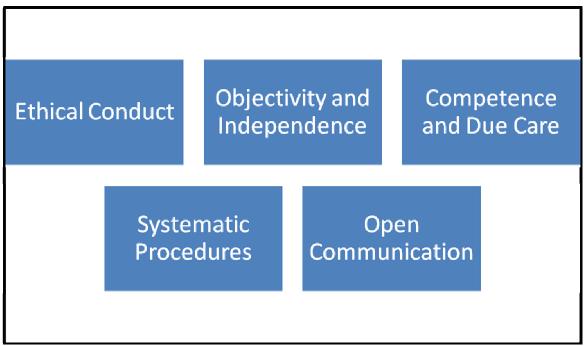


Figure 2- Principles of Auditing

#### 1.1.1 Ethical Conduct

Trust, integrity, confidentiality and discretion are essential to auditing. Audits completed for the users are to remain the confidential property of the user. Auditors shall not disclose information without the permission of the user. Legal counsel should be consulted by the user if any issue is identified which could lead to legal liability for the user. This contact should be made by senior personnel of the companies.

#### 1.1.2 Objectivity and Independence

The objectivity and independence of auditors is critical to the success of an audit program. Each member of the audit team must be independent of the audit client. Auditors cannot audit their own work. When selecting the audit team, care must be taken to select auditors with appropriate seniority to complete the audit, and yet not so much seniority that interviewees are intimidated. There should be a clear separation of the auditors and the auditee. In an internal audit, the assessment of independence is somewhat subjective, and should be assessed by both the auditor and auditee. Also give consideration to the perception that auditors who lack independence may lack objectivity.

#### 1.1.3 Competence and Due Care

The audit team must include personnel with appropriate training, skills and knowledge to complete a technically sound audit. The audit team must possess an understanding of the audit process and also a technical understanding of the facilities being audited.

As described in Z763-03 (CSA, 2003), "an auditor must use the care, diligence and good judgement of any auditor under similar circumstances". The test: a second audit team working at the same time should be able to reach similar findings.

#### 1.1.4 Systematic Procedures

By following the evidence-based procedures outlined in this manual and in the referenced audit standards, audit risk can be minimized. The audit team must collect sufficient evidence to support their conclusions. Evidence may include things such as written notes, copies of records, and (if allowed) photographs. Evidence must be verifiable.

#### 1.1.5 Open Communication

In order to truthfully and accurately report the audit activities, there must be open communication between the members of the audit team and the auditee. Diverging opinions should be resolved.

An audit should not be an ambush of the auditee. Openly share the audit criteria and checklists with the auditee in advance of the site visit. Communicate frequently during the audit work. In particular, share any potentially significant findings prior to the closing meeting.

#### 1.2 Audit Limitations

There are inherent limitations to any audit. The audit team can assess only a sample of facilities and records. An audit is conducted during a finite period and with finite resources. Audit findings are based solely on evidence gathered at the time of the audit, and therefore the audit report may not identify all environmental concerns at the facility. By adhering to the audit principles identified in section 1.1, audit risk can be minimized.

#### 2.0 Managing an audit program

As an organization, the users should develop an overall audit program. A flow chart showing the management of an audit program is presented in Figure 3.

Authority from top management of the users is required to establish the audit program. The Program Manager is responsible for identifying resource needs, and establishing, implementing, maintaining and improving the audit program.

Consideration should be given to conducting joint audits with other programs (e.g., health and safety). Combined audits minimize the disruption to facility business, and may reduce overlap between audits and programs.



Figure 3- Audit Program Process Flow (from ISO 19011:2002)

#### 2.1 Audit Program Establishment

The establishment of an audit program should be based on the overall management priorities, regulatory requirements, customer requirements, and the needs of other interested parties. An overall plan should be prepared showing:

- 1. The scope, objective and duration of each audit to be conducted over a specified period.
- 2. The frequency that audits will be conducted.
- 3. The criteria for each audit.
- 4. Responsibilities for each audit, including selection of audit team.
- 5. Required resources, including personnel, time and equipment.
- 6. Audit procedures (may be from this manual, or adapted from this manual), including details of record keeping.

#### 2.2 Audit Program Implementation

To implement the audit program, the audit coordinator must have the overall plan approved by senior management. The coordinator will then:

- 1. Communicate the plan to relevant parties.
- 2. Coordinate the scheduling of the audits identified in the plan.
- 3. Ensure that the Lead Auditor is assigned and audit team members are selected.
- 4. Provide necessary resources to the audit team.
- 5. Ensure that audits are completed as planned.
- 6. Review and retain audit reports and other records.
- 7. Communicate audit findings as appropriate to senior management or other similar facilities.
- 8. Maintain an overall database of audit follow up actions.

#### 2.3 Monitoring and Review of Program

The overall implementation of the audit program should be reviewed at specified intervals to assess its effectiveness and to identify opportunities for improvements.

Things to consider:

- Were planned audits conducted?
- Are the audit checklists appropriate?
- Are other audit tools appropriate?
- What feedback has been received from auditees and auditors?
- Have audit findings been resolved?
- Have changing conditions resulted in a need for major changes to the program?

#### 3.0 Audit Planning

Audit planning results in a written audit plan that can be shared between the audit client, audit team and auditee. An example audit plan is contained in Appendix A.

#### 3.1 Define Audit Objectives, Scope and Criteria

The client (i.e., the corporate offices of the user) is responsible for identifying the objectives, scope and criteria of each audit.

- 1. The audit objectives are what is to be accomplished by the audit.
- 2. The scope covers the extent and boundaries of the audit (e.g., what facilities, activities and processes will be audited). The scope also includes the time period covered by the audit. Most often, the audit period is the time elapsed since the last audit. If no previous audit has been conducted, choose a period that provides representative records for a full business cycle (e.g., at least one year).
- 3. The criteria are the requirements against which the auditee will be judged. The document has three sets of audit checklists containing criteria identified as appropriate for current operations of PCJ. An additional checklist for ISO 14001:2004 has also been provided.
  - a. Seismic program criteria are contained in the checklist in Appendix B.
  - b. Refinery criteria are contained in the checklist in Appendix C.
  - c. Service station and storage criteria are contained in the checklist in Appendix D.
  - d. While not currently applicable, ISO 14001 requirements are provided in Appendix E for future reference.

#### 3.2 Audit Scheduling

The audit should also be tentatively scheduled at this point so that the auditee and audit team members can block their calendars off, and guides (if necessary) can be identified. Ideally, the schedule should be set more than one month in advance. During scheduling, consideration should be given to providing preparation and wrap up time for the audit team, and also to avoiding undue business interruption for the auditee. If possible, schedule site visits at off-peak times so that workers can provide more time to the auditors. Avoid statutory holidays, busy vacation periods when key personnel may be away, and ending an audit on a Friday afternoon when personnel may be less likely to be receptive to audit findings.

#### 3.3 Select the Audit Team

The first person appointed to the audit team should be the Lead Auditor.

The audit team should then be selected by the Lead Auditor (or with the Lead Auditor's agreement). Collectively, the team must have the knowledge, skills, attributes and experience necessary to meet the objectives of the audit. Figure 4 shows the elements of competence.

It should be confirmed that all auditors are committed to the audit project for the identified time period for the audit.

Auditors-in-training can participate in audits, but should complete their work under supervision.



Figure 4- Auditor Competence

#### 3.4 Review Documents

Prior to conducting on-site activities, the audit team must gain an understanding of the activities and facilities of the auditee. This information may be gained by reviewing relevant environmental documents and plans for the company/facility (e.g., historical information, organizational charts, environmental reports, management system manuals). Information may be available from websites or from the auditee. The audit team must have an understanding of the size, nature and complexity of the company/facility in order to prepare an audit plan. Be sure to confirm whether all records/documents will be available on-site during the audit, or if the audit team may have to access records that are retained elsewhere (e.g., a central office rather than on site).

Hint: Use the pre-audit questionnaire in Appendix A to request comprensive environmental documents and records prior to the audit.

#### 3.5 Prepare an Audit Plan

Prepare a brief written audit plan using the example provided in Appendix A, or other similar layout. The audit plan contains information on the audit:

- objectives;
- scope;

- criteria and any reference documents (e.g. procedures of the user, ARPEL documents);
- audit team,
- audit schedule (dates and places where the on site audit activities will be conducted),
- contact personnel at the site;
- information on meetings with the auditee's management;
- audit logistics information (travel, on-site facilities such as cafeterias);
- safety requirements (personal protective equipment, training requirements);
- security details (if applicable), such as inaccessible areas of the site;
- auditor resource needs (e.g., internet access, access to site databases/IT systems, meeting room, telephone, photocopier, etc.);
- details on requirements for guides to direct the audit team;
- information relating to confidentiality; and
- proposed auditing procedures (e.g., will photos be taken?).

The plan should be reviewed and accepted by the audit client and the auditee prior to the audit. Any objections to the plan should be resolved before commencing the audit.

For management system audits such as ISO 14001 (if completed in future), a more detailed schedule should be prepared to show that all elements of the system are being audited. An example schedule is provided in Appendix A.

# Hint: Use the audit plan template in Appendix A as a model.

#### 3.6 Prepare Work Documents and Tools

The Lead Auditor is responsible for ensuring that audit work has been assigned to appropriate members of the audit team, and that required documents and audit tools are available.

The audit team should use an audit protocol (checklist) that reflects the audit scope, criteria, and environmental profile of the company/facility. While checklists for standard PCJ activities have been prepared and are provided in appendices to this document, they may quickly become outdated due to changes in the facility, or changes to legislation or guidelines. Review the appropriate checklist prior to use, and edit as necessary, deleting or adding new requirements.

The checklists have been designed to:

- be arranged logically by topic;
- organized to maximize efficiency of the audit; and
- provide references for the requirements.

Another audit tool that should be distributed for use by the audit team is the working paper, a ruled paper that can be used to record audit evidence. See Appendix A.

Hint: Each auditor should have a binder containing:

- the audit plan
- the audit checklist
- audit working papers
- reference documents (if applicable)
- post-it notes or flags

#### 3.7 Audit Team Meeting

If the audit team is not used to working together, it may be a good idea to have a team meeting in advance of the audit to ensure that all team members are aware of the audit plan and their responsibilities.

#### 4.0 Audit Execution

#### 4.1 Opening Meeting

A brief opening meeting should be held at the start of on-site audit activities. It should be attended by the audit team and key members of the auditee staff. This meeting generally takes less than 20 minutes and no minutes are kept. The agenda of the opening meeting should include:

- 1. Introduction of the audit team and key members of the auditee team.
- 2. A review of safety requirements and procedures, including evacuation points, alarms, etc.
- 3. Confirmation of the audit plan and all its contents (as noted above), including whether photos can be taken.
- 4. A short description of how audit activities will be undertaken.
- 5. Confirmation of communication channels.
- 6. Confirmation that necessary audit resources and guides are available.
- 7. Confirmation of the confidentiality of the audit process.
- 8. An opportunity for the auditee to ask questions.

Use the Meeting Record Form in Appendix A to record attendance.

#### 4.2 Collecting Evidence

Information relevant to the audit objectives should be collected during the on-site activities. Keep an ongoing list of potential issues. Audit evidence must be verifiable, and should be recorded. Since evidence is collected based on a sampling of data, there is an element of uncertainty in the findings. Sampling should continue until a conclusion can be reached regarding compliance with a requirement (e.g., that a clear pattern of compliance or non-compliance has been confirmed.

Audit evidence is gathered only on site. Do not contact outside agencies or regulators to request information on the site.

Methods for collecting evidence include:

- a. observation of activities (the strongest evidence);
- b. review of document and records; and
- c. interviews (the weakest evidence).

Make note of positive initiatives and results, not only negative evidence.

#### 4.2.1 Observation

On site observation should include a facility tour. A tour is generally the first activity undertaken following the opening meeting. If possible, the entire audit team should tour the facility together with a knowledgeable guide prior to splitting up to complete the rest of the audit. Observations of potential concerns or topics for further investigation should be recorded on working papers.

If available, use a site plan to record information during tours. Ask questions, take notes and (if allowed) photographs during the tour. Take the audit checklist on all tours, answering questions as you go.

Look for obvious areas of concern such as spills, distressed vegetation, deteriorating equipment or berms, oily sheens on water, hydrocarbon odours, overflowing waste containers.

#### 4.2.2 Document and Records Review

Document and records review ideally begins prior to the on-site activities. Documents and records that may be relevant are listed in the pre-audit questionnaire. They include: policies, procedures, licences, approvals, specifications, drawings, contracts, invoices, meeting minutes, audit reports, monitoring records, laboratory analyses, etc. Documents and records may be in paper or electronic form. They provide factual information about environmental compliance. Where appropriate, photocopy or print records as audit evidence.

Regulatory reporting is a critical issue. During the document and records review, be sure to check all reports submitted to regulatory agencies against the requirements for reporting. Check for: content, completeness, date of submission, any exceedences noted.

Review reports on any inspections completed by regulatory personnel. Review documented follow up to those inspections.

Review correspondence to and/or from regulators.

## **Documentation Review Hints:**

- Request documents and records relating to potential issues identified during site tours or in interviews
- Look for **consistent** record keeping (e.g., daily or weekly checks).
- Are forms completed fully?
- Are there gaps in the records?
- Can records be traced back to the person who completed them?
- Request access to site electronic files

#### 4.2.3 Interviews

Interviews are a very important source of information during an audit, but they are also the weakest form of evidence. All interview information should be corroborated. Depending on the seniority of the interviewee and the nature of work, interviews may be arranged in advance, or may be opportunistic. Interviews should include workers at all levels within the organization. Do not rely on information solely from senior management. Front-line workers must be interviewed. If possible, interview short-service workers or contractors on site to assess their understanding of requirements.

Except for the most senior employees interviewed, avoid setting rigid interview schedules. It is difficult to estimate the duration of audit activities.

#### Interview Hints:

- The interviewee may be nervous put them at ease through your tone and mannerisms
- Introduce yourself
- Explain the purpose and objectives of the audit
- The first question should be a general question getting the person to describe their work
- Avoid leading questions wherever possible ask open ended questions rather than questions that have a yes/no answer
- End by thanking the interviewee

#### 4.3 Communication During the Audit

The audit team should meet regularly during the audit to exchange information, assess progress, and (if necessary) revise the audit plan or re-assign audit activities. In longer or more complex audits with multiple auditors, this communication may take place in formal daily meetings.

The Lead Auditor should keep the auditee informed regarding the progress of the audit and any significant findings. Report any difficulties so that they can be resolved and the audit completed successfully. For example, if records cannot be located, give the auditee a chance to find them elsewhere. If it becomes apparent that the audit objectives will not be met in the time allowed, notify the auditee.

Auditors may note findings outside of the audit scope (e.g., safety hazards may be noted during an environmental audit). Report these findings to the auditee as appropriate.

## Important!!

Notify the auditee quickly of any conditions identified during the audit that need immediate attention or represent a serious risk. Do not wait until the closing meeting or end of the business day.

#### 4.4 Generating Audit Findings

The audit team should confer at the end of the audit to identify findings and conclusions. Audit evidence is evaluated against the audit criteria to generate audit findings. Audit findings can indicate either compliance or non-compliance with a requirement. If identified as one of the audit objectives, audit findings may identify areas for improvement (where non-compliance is possible but was not observed). Findings may be ranked for severity.

An overview of the process to collect audit evidence is shown in Figure 5.

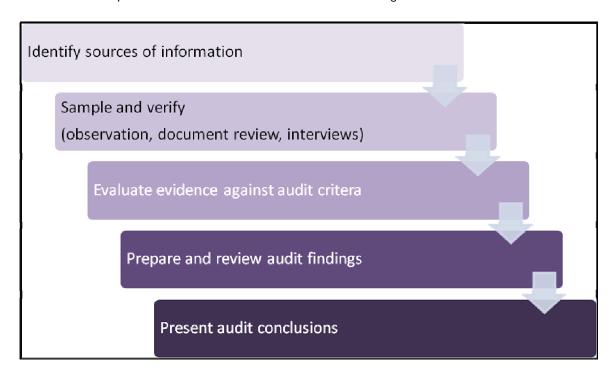


Figure 5- Process Used to Reach Audit Conclusions

#### 4.5 Closing Meeting

A closing meeting should be held at the end of the audit. Participants in the meeting should include the audit team, the auditee, and may include the audit client. Most often, it is held at the end of on-site audit activities, but occasionally it is held elsewhere (e.g., a head office). This meeting is generally longer than the opening meeting. It may be a formal meeting in which minutes are kept. Findings are not generally provided in writing (due to the presentation of results immediately after conclusions are formed). This meeting presents an opportunity for the auditee to identify diverging opinions with the auditors, and to indicate if they believe they have additional evidence that should be reviewed.

The agenda of the closing meeting should include:

- 1. Introduction of the audit team if there are people in attendance who were not at the opening meeting. Review audit roles.
- 2. Thank the auditee, acknowledging particularly helpful people by name.
- 3. Describe audit risk.
- 4. Review whether the audit plan was followed successfully, or note any changes.

- 5. Present preliminary audit findings and conclusions, including positives as well as non-compliance issues.
- 6. Discuss any diverging opinions between the auditee and the audit team.
- 7. Describe the formal reporting process.

Use the Meeting Record Form in Appendix A to record attendance.

#### 5.0 Audit Reporting

The Lead Auditor is accountable for preparation of the audit report. An auditor may write the report under their supervision. The audit report should provide a concise, accurate and complete record of the audit. It should include:

- the objectives, scope and time period of the audit;
- a summary of the audit processes;
- a description of audit risk/limitations and any obstacles that were encountered that could increase audit risk;
- identification of the audit client, audit team, and auditee;
- a description of the facilities audited;
- reference to the audit criteria; and,
- the audit findings and conclusions, including any unresolved issues between the audit team and the auditee.

The report may also include follow up findings of past audits.

A copy of the audit plan should be appended.

Audit reports are generally exception based (i.e., only findings are presented). Auditors should be given the opportunity to review the report. The report should be dated and signed by the author and reviewer, one of whom must be the Lead Auditor. The reviewer should ensure that the audit:

- 1. Met the audit objectives.
- 2. Contains valid and accurate results (i.e., that the findings are based in fact and legislation has been appropriately interpreted).

An advance draft of the audit report is generally provided to the auditee as a last chance to review the findings are identify errors or omissions by the audit team. Once the audit report has been provided by the Lead Auditor to the client, further distribution of the report is at the client's discretion. The audit team members must respect the confidentiality of the report.

Hint: Use the report template provided in Appendix A.

#### 6.0 Audit follow up

The conclusions of the audit may indicate the need for corrective, preventive, or improvement actions. It is the responsibility of the auditee to identify necessary actions and implement planned changes. The audit team is generally not involved in this process.

Follow up plans generally document the audit finding, proposed actions, responsible person, budget requirements, a target date for completion, and status of the action. An example audit follow up plan is contained in Appendix A. This action plan may be reviewed as a part of subsequent audits.

#### 7.0 References

- Canadian Standards Association, 2003. "Environmental Compliance Auditing", CSA Standard Z773-03.
- International Organization for Standardization, 2002. "Guidelines for quality and/or environmental management systems auditing", ISO Standard 19011:2002.

#### **APPENDIX A - AUDIT TOOLS**

This appendix contains audit tools that were prepared to be used for audits of PCJ's refinery, service station/storage facilities, and offshore seismic operations. However, they can be used by other oil and gas companies although they should be adapted to their specific –local- regulatory framework and/or corporate procedures.

#### **Environmental Audit**

## Audit Plan - (insert Facility Name)

Time: Time Place: Place

#### Audit Objectives:

- (edit the Audit Objectives as Appropriate)
- Determine the facility's status of compliance with environmental legislation and guidelines;
- Assist operations in the evaluation and mitigation of environmental [and compliance] risks at through site inspections, communication of findings and recommendations, determination of facility action plans, and documentation of mitigation actions
- Identify areas of potential environmental risk; situations that could be improved by adoption of industry best practices; and positive practices that may be used as learning tools for other PCJ operations.

#### Scope:

(Describe)

#### Criteria:

Environmental legislation pertinent to the facilities, including acts and regulations administered by (provide Department or Group). Also industry guidelines and best management practices from ARPEL and PCJ policies and procedures.

#### **PCJ Audit Program Manager:**

Name and Contact Information

#### Audit Team:

Lead Auditor: Name and Contact Information Auditors: Name and Contact Information

#### **Facility Contacts:**

Name and Contact Information

#### Personal Protective Equipment Required:

(List Requirements)

#### **Other Logistical Requirements**

(List any other audit requirements, such as a need for security clearance, interview appointments with personnel, or provision of guides on site.)

#### **Proposed Schedule:**

Activity	(i) Time	(ii) Location
1) Safety Orientation (if required)	Time	Location
2) Opening Meeting	Time	Location
3) Audit Activities	Time	Location
4) Closing meeting	Time	Location

#### Protocol:

Environmental compliance protocol supplied by PCJ.

#### **Auditing Procedures:**

The opening meeting will include an overview of the audit plan, a review of any logistical restrictions and the anticipated schedule for getting around to all the facilities. The auditing procedures will consist of interviews, on-site observation and reviews of relevant procedures and records.

#### **Audit Duration:**

It is estimated that the audit will take (insert Number of Days) days to complete.

#### **Closing Meeting and Audit Report:**

The closing meeting is scheduled for (insert Time) (time to be confirmed) at which time the audit team will review its findings. A draft final audit report will be completed by (insert Date) for circulation and comment. The final report will be issued within two weeks following the receipt of all comments.

## PRE-AUDIT QUESTIONNAIRE ENVIRONMENTAL AUDIT

This Pre-Audit Questionnaire is intended to provide facility information prior to an on-site environmental and/or health and safety audit. Please provide a response to all questions, other than those already marked as "not applicable". A completed questionnaire can reduce the time spent at facilities and result in an efficient, more comprehensive audit. The information you provide here should be concise, yet complete.

Please return the completed form to: PROVIDE NAME AND CONTACT INFO

#### PART 1 - GENERAL INFORMATION

**Facility Information** 

<b> </b>			
Person(s) Completing Questionnaire:			
Position/Title:			
Facility Name:			
Street Address:			
City, Province:			
Facility Telephone:			
Facility Contact(s):			
Title(s):			
Telephone:			
Facsimile:			
E-mail:			
Personal Protective Equipme	ent		
Hard Hats		Hearing Protection	
Safety Glasses (w/ side shie	ılds)	Steel Toed Boots	
Other:			
Special Visitor Requirement	S		
Training:			
Attire:			

## **Audit Logistics**

Audit Scheduling						
Activity	Day	Date	Time			
Conference Call/Meeting						
Arrival at Facility:						
Opening Meeting:						
Daily Meeting(s):						
Pre-Closing Meeting:						
Closing Meeting:						
If available, please provide audit team with office space (meeting room preferred) and telephone line.						

If available, please provide audit team with office space (meeting room preferred) and telephone line. If required to view environmental records, computer access should also be provided. This should be close to environmental contact work area.

## General / Management

No.	i) Applicability Questions	Yes	No	NA
1.	Provide copies of all environmental licenses, permits, approvals and exemptions held by the facility.			
2.	List the natural resources that are produced/handled (e.g., sweet crude, sour crude, sweet natural gas, sour natural gas, condensate, etc.):			
3.	Do special arrangements need to be made to visit or inspect all of the facilities associated with this site?			
4.	Attach a list of all hazardous materials used at the site, if available.			
5.	Has an EHS audit, either internal or external, been conducted at the site within the last 3 years?			
6.	Attach a map showing the locations of the main operational facilities and plant boundaries.			
7.	Attach a site plan with all site features identified.			
8.	Is aerial photography available for the site? If yes, have available on site.			
9.	Does the site have a filing system and index for EHS files? If yes, have available on site during the audit.			
10.	Are there any current administrative/judicial orders, pending or threatened litigation, unresolved allegations, citations, or notices of violation?			

## PART 2 – QUESTIONNAIRE

## **Waste Management**

No.	Applicability Questions	Yes	No	NA
1.	Does the facility generate any of the following wastes:			
	a. Hazardous Wastes?			
	b. Industrial (Non-Hazardous) Wastes?			
	c. Medical (Pathogenic) Wastes?			
	d. Used Oil?			
	e. Asbestos Wastes?			
	f. General Trash?			
	g. Recyclables?			
	h. Other:			
2.	What is the hazardous waste generator identification number, if applicable?			
3.	Are there specific hazardous waste storage or accumulation areas at the site?			
4.	Has a drum management plan been developed for the facility? If available, attach a copy.			
5.	Is the site a permitted treatment, storage and disposal facility? If yes, please provide copy of applicable permit(s).			
6.	Does the facility operate (or participate in the operation of) any waste treatment or disposal sites (on- or off-site)?			
7.	Does the facility have an emergency response plan?			
8.	Are there any waste minimizations programs at the facility?			
9.	Does the Facility produce used oil? If so, how many litres per month?			
10.	What is the method of disposal or recycling of used?			
11.	Has the facility been the subject of a government inspection in the past?			
12.	Has the facility received any "Orders" for any alleged violations of federal, provincial, or local waste management law or regulation?			
13.	Are there disposal wells on site?			

#### **Water Pollution Control**

No.	Applicability Questions	Yes	No	NA
1.	Are any of the following waters/wastewaters generated at the facility? Check all that apply.			
	a. Process water (aka industrial wastewater)?			
	b. Non-contact water?			
	c. Sanitary wastewater (i.e., sewage)?			
	d. Stormwater?			
2.	Are there any discharges to surface water? If yes, provide information on outfalls and receiving waters.			
3.	Are there groundwater supply wells on site?			
4.	Are their groundwater monitoring wells (aka piezometers) on site?			
5.	Does the site's discharge permit(s) contain "special conditions" (i.e., priority pollutant analysis, biomonitoring, etc.)? If so, please list.			
6.	Does the facility discharge wastewater to a storm sewer?			
7.	Is the facility required to submit a storm water permit application? If yes, what is the status of the permitting process?			
8.	Is an analytical laboratory used for wastewater sampling and analyses (i.e., in-house laboratory or outside laboratory)?			
9.	Has the facility been the subject of a government inspection where inspection of the water discharge was conducted?			
10.	Has the facility received any notices of violation for any alleged violations of federal, provincial, or local water pollution control legislation?			

## **Drinking Water**

No.	Applicability Question	Yes	No	NA
1.	What is the source of the facility's potable water?			
2.	Is the potable water available at the facility treated and distributed by the facility?			
3.	Does the facility monitor on-site drinking water sources?			

#### **Air Emissions**

No.	Applicability Question	Yes	No	NA
1.	Is the facility required to register air emission sources?			
2.	Does the facility conduct any air emission monitoring?			
3.	Has the facility emissions resulted in complaints from the general public as a result of odours, fugitive dusts, other?  Please specify if yes:			
4.	Does the facility utilize air pollution control equipment? If yes, have information available on site during the audit.			
5.	Is equipment used containing ozone-depleting substances (ODS)? If yes, which type of ODS (e.g., Halons, CFC, etc.):			

## Land Use

No.	Applicability Questions	Yes	No	NA
1.	Are threatened and/or endangered species known to inhabit areas near the facility?			
2.	Are any portions of the land near ecological reserves, protected natural areas or parks?			

## Storage Tanks

No.	Applicability Question	Yes	No	NA
1.	Are there any underground storage tanks at the facility? Have any been removed? If so, provide an inventory showing tank sizes and contents.			
2.	Are there any above ground storage tanks in use? If so, provide an inventory showing tank sizes and contents.			
3.	Does the facility dispense fuel to motor vehicles?			

## **Chemical Management**

No.	Applicability Questions	Yes	No	NA
1.	Does the facility use or store any materials classified as:			Χ
	Toxic? (including pesticides/herbicides)			
2.	Flammable/Combustible?			Χ
3.	Corrosive?			
4.	Reactive?			
5.	Are PCBs or PCB contaminated oils in use or stored in the facility?			
6.	Transformers?			

7.	Capacitors?		
8.	Electromagnets?		
9.	Hydraulic Systems?		
10.	Does the facility have a PCB storage area?		
11.	Does the facility maintain information about past PCB waste disposal operations or practices?		
12.	Are any asbestos containing materials present on-site?		
13.	If yes, is there an asbestos program in place for the facility?		
14.	Has any asbestos containing material been removed in the last year?		
15.	Does the facility use any pesticides, fungicides or rodentcides?		
16.	Are there LPG storage facilities on site?		

#### **Records Request List**

Please provide the following information with the completed pre-audit questionnaire.

- Facility plot plan or map
- Facility organization chart
- Description of the operations
- Listing of current permits and applications
- Recent regulatory agency inspection/enforcement correspondence, if any
- Recent internal and external audit reports and action plans
- Facility environmental policies, procedures, and guidelines, if applicable
- Chemical inventory

The following is a list of files, records and documents which may be assessed during the facility audit. Please indicate the personnel responsible for these topic areas, whether the following items are available and where they can be located. Please ensure that these files are available for review during the audit. We appreciate your taking time to locate these items.

File/Program List	File Location
General / Management Personnel Responsible:	
1) Organizational charts	
2) Job descriptions	
3) Formalized goals and objectives	
4) Previous audit reports	
5) Training Records	
6) Release/Incident Reporting Procedures and records	
7) Process Flow Diagrams, Plot Plans, Topographic Maps, Aerial Photography	

	File/Program List	File Location
8)	Agency inspections, including violations, responses	
Solid / F	lazardous Waste Management Personnel Responsible:	
1)	Waste Inventories	
2)	Waste Management Plan(s)	
3)	Hazardous waste manifests and logs (2 years of manifests)	
4)	List of approved disposers - Hazardous & Non Hazardous	
5)	Permits and reports for on-site treatment/disposal of waste, if applicable	
6)	Non hazardous waste records	
7)	On-site storage area records	

	File/Program List	File Location
Water Po	ollution Control Personnel Responsible:	
1)	Wastewater plans, permits or authorizations / approvals	
2)	Wastewater collection and treatment systems, including operation and maintenance activities	
3)	Industrial, sanitary and storm sewer plans/drawings, test reports, etc.	
4)	Wastewater monitoring/sampling data and reports	
5)	Laboratory analytical reports	
6)	Groundwater monitoring reports	
Drinking	Water Personnel Responsible:	
1)	Drinking water system and/or well location	
2)	Inventory of drinking water wells on-site	
3)	Well information (driller's logs)	
5)	Analytical test results	
Air Emis	sions Personnel Responsible:	
1)	Certificates of Approval	
2)	Inventory of air emission sources and contaminants	
3)	Emission monitoring data and reports	
4)	Dispersion modelling reports and follow up	

	File/Program List	File Location
5)	Noise monitoring data and reports	

	File/Program List			
Storage	<u>Tanks</u> Personnel Responsible:			
1)	Inventory of tanks (above and underground) and contents			
2)	Notifications or registrations of tanks with regulatory agencies			
3)	Remediation projects – correspondence and reports			
4)	Spill history			
5)	Records on tank system testing (integrity test, etc.) and volume calculations for secondary containment			
Chemica	al Management Personnel Responsible:			
1)	Chemical Inventory			
2)	Material Safety Data Sheets			
3)	List of Hazardous Material Storage Facilities			
4)	List of Radioactive Equipment and associated licenses			
5)	PCB Inventories			
6)	Transportation of Dangerous Goods – Shipping Documents			
7)	List of pesticides, herbicides, fungicides used per area			

## AUDIT MEETING RECORD

Auditee:		Project #:	
Date & Location of Opening	Meeting:		
Date & Location of Closing	Meeting:		
Name	Position/Company	Opening Meeting	Closing Meeting

Name	Position/Company	Opening Meeting	Closing Meeting
IVAIIIC	r osmon/company	Opening weeting	Ciosing weeting

# ENVIRONMENTAL AUDIT WORKING PAPER

		Page	of
Business Unit / Company Division	Auditor:		
Auditee:	Date :/	1	(Y/M/D)
Observations, Data and An		Cros	s-Reference to ecklist Item
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28 Attachments: Y (list above) N			

13-A

## EMS - Audit Plan for ISO 14001:2004

		TEAM				·	
Auditee:		1	2	3	4	5	6
		Α	Α				
		U	U				
		D	D				
		Τ	T				
		0	0				
Contact:		R	R				
Manual:	List most recent EMS Manual Date	1	2				
Criteria:	ISO 14001:2004						
Audit Date(s):							

#### Reference

Referen	ce					
1.1	Scope & Use Of Certificates & Logos	NC				
4.1	General Requirements	С	Χ			
4.2	Environmental Policy	С	Χ			
4.3.1	Environmental Aspects	С	Χ			
4.3.2	Legal & Other Requirements	С	Χ			
4.3.3	Objectives & Targets	С		Χ		
4.4.1	Structure and Responsibility	С		Χ		
4.4.2	Training Awareness and Competence	С		Χ		
4.4.3	Communication	С		Χ		
4.4.4	Environmental Management System Documentation	С	Χ			
4.4.5	Document Control	С	Χ			
4.4.6	Operational Control	С		Χ		
4.4.7	Emergency Preparedness and Response	С		Χ		
4.5.1	Monitoring and Measurement	С		Χ		
4.5.2	Evaluation of Compliance		Χ			
4.5.3	Nonconformance and Corrective and Preventive Action	С		Χ		
4.5.4	Control of Records	С		Χ		
4.5.5	Internal Audit	С	Χ			
4.6	Management Review	С	Χ			

<sup>\*</sup>NC = Not Covered, C=covered

# **AUDIT PLAN - DAILY PROGRAM SCHEDULE**

AUDITEE:	Project :
----------	-----------

CRITERIA: ISO 14001:2004

DATE(S) :
Aspects: \* All

DAY 1			
	AUDITOR #1 (LIST NAME)		AUDITOR #2 (LIST NAME)
8:00	Audit Team Briefing/Opening Meeting	8:00	Audit Team Briefing/Opening Meeting
4.1	General Requirements	4.3.3	Objectives, Targets and Program
4.2	Environmental Policy	4.4.1	Resources, roles, responsibility and authority
4.3.1	Environmental Aspects	4.4.2	Training Awareness and Competence
4.3.2	Legal & Other Requirements	4.4.3	Communication
4.4.4	Documentation	4.4.6	Operational Control
DAY 1			L
4.4.5	Control of Documents	4.4.7	Emergency Preparedness and Response
4.5.2	Evaluation of Compliance	4.5.1	Monitoring and Measurement
4.5.5	Internal Audit	4.5.3	Nonconformance and Corrective & Preventive Action
4.6	Management Review	4.5.4	Control of Records
3:00	Closing meeting		

<sup>\*</sup>Each team member will also cover areas beyond those of the of the significant aspects, as required by each element

# **Example Audit Follow Up Plan**

Audit Finding	Priority	Follow up Action	Responsible	Budget	Target Date	Status
Liner for berm around 15,000 L aboveground storage tank at facility is torn	Medium	Replace liner during facility turnaround	Robert Smith	\$30,000	June 30, 2009	Contracting in progress as of November 2009
MSDS out of date at repair shop	Low	Obtain current MSDS	Jane Brown	\$50	December 31, 2008	Assigned to environmental intern Nov. 1, 2009

# **Audit Report**

(insert type of audit)
– (insert business unit)
(insert audit dates)

# **Table of Contents**

Audit Team	18-A
Audit Scope and Objectives	18-A
Findings	18-A
Findings Summary	19-A
<u>Appendices</u>	
Appendix A - Audit Findings	20-A
Appendix B - Audit Plan	

#### **Audit Plan**

The Audit Plan dated (insert audit plan date) was prepared by the lead auditor and forwarded to (insert business unit) prior to audit team arrival on site to conduct the audit. The audit (insert "was" or "was not") performed according to the Audit Plan included in the Audit Plan. (If "was not" then leave in the following statement. If "was" then delete the following statement and Appendix B). A revised schedule indicating the areas covered by the audit is included as **Appendix B**.

#### **Audit Team**

Lead Auditor -

(insert name and/or designations)

Auditor(s) -

(insert name and/or designations)

# Audit Scope and Objectives

(insert description)

## **Findings**

Audit findings are based on analysis of the information obtained during the course of the audit. Detailed audit findings are included in **Appendix A**.

Audit findings have been reviewed with the auditee's representative in order to obtain acknowledgement of their factual basis.

F	ir	nd	ir	ıg	S	
S	u	m	m	na	r١	۷

Findings are classified as posing high, medium or low potential environmental risk.

Concern / Legal Reference	Low	Medium	High
insert area of concern			
insert area of concern			

# Previous Audit Findings

(insert status of previous audit findings)

# Audit Confidentiality

The audit was prepared for the exclusive use of the auditee. The results of the audit will be considered confidential, and will not be released to any third party without the consent of the auditee.

### **Audit Limitations**

This audit uses a sampling approach to selecting the facilities and employees to audit based on the business unit's operations, procedures and processes related to their significant environmental aspects and/or legal and other environmental requirements. Findings and conclusions are based solely on the information gathered and reviewed during the audit. Non-compliances may be present within and beyond the scope of the audit.

# Audit Report Preparation

(insert lead auditor name and/or designations)

(insert lead auditor phone number)

(insert lead auditor email)

Date: (insert date of report preparation)

Signature			

# Appendix A

Location		Name of Auditor(s)		
Facility, Building or Address		Name of Auditor(s)		
3. 3		,		
Auditor's Description of Finding		l		
(b) Finding #	Audit Criteria: (Regulatory Citation or A	Auditee manual/procedure)		
YYMMDD-01	Legislated Reference or Guide	eline		
Priority Ranking:				
High/Medium/Low				
(c)				
Condition Expected:				
Outline the expectations described in	the standard or legislation.			
Condition Found:				
Provide a description of finding and st	ate environmental risk or impact	t. Include specific area if applicable. Insert photo		
if applicable.				
Recommendation:				
Provide recommendations for preventive and corrective action.				

Insert Audit Plan

## APPENDIX B - OFFSHORE SEISMIC OPERATIONS

# **Seismic Protocol**

This appendix contains audit checklists that were prepared to be used for audits of PCJ's offshore seismic operations. However, this checklist can be used by other oil and gas companies although they should be adapted to their specific –local-regulatory framework and/or corporate procedures.

Checklist for Conducting Environmental Audits: Offshore Seismic Operations

Prepared for: Petroleum Corporation of Jamaica

The user is encouraged to have at hand the ARPEL Guideline #14 "Guidelines for Conducting Environmental Audits for the Petroleum Industry Operations" (1997), found at <a href="http://portal.arpel.org/apps%5Carpel%5Cml">http://portal.arpel.org/apps%5Carpel%5Cml</a> lib nueva2.nsf/0/0EF86569B866C51003257226006D3465?opendoc ument&FolderID=4456269EDB93459803257213005F63F0

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#### 1.0 PROGRAM PLANNING

# 1.1 Regulatory Authority

#### Requirement

Required licenses, permits and letters of authority have been obtained for the planning, design, construction and operation of off shore seismic operations facility. Any special conditions or restrictions are reviewed and enforced.

Specific Requirement	Finding					
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable		
Required permits, licenses and regulatory						
authorizations for the seismic operation are						
available for review.						
Conditions, restrictions and requirements of						
permits and licenses have been included in						
program design and operation.						
A detailed schedule of seismic operations is						
documented and was submitted to The						
Marine Authority of Jamaica, The Ministry of						
Agriculture Fisheries Division, The National						
Environment and Planning Agency, the Port						
Authority of Jamaica, and the Jamaica						
Defence Coast Guard, 5 or more days before						
the survey started.						
Facility operators are aware of the conditions						
and restrictions, and environmental concerns						
for the seismic operations.						
Cuidanco			·			

### Guidance

Refer to: ARPEL Guideline #14 SEIS 1.0 Regulatory Environmental Authorization; Fisheries and Oceans Canada, 2007. Mitigation of Seismic Noise in the marine environment, Statement of Canadian Practice, found at <a href="http://www.dfo-mpo.gc.ca/oceans-habitat/oceans/im-gi/seismic-sismigue/statement-enonce\_e.asp">http://www.dfo-mpo.gc.ca/oceans-habitat/oceans/im-gi/seismic-sismigue/statement-enonce\_e.asp</a>

Check office and site records for permits and regulatory authorizations, such as NEPA letter of approval with conditions. Check that permits and licenses are available from seismic operations supervisory personnel. Check for documentation and reports that address limitations or conditions required by the permits, such as: for Protected and Conservation Areas, and existing pipelines. Compare maps showing locations of the lines and anchoring logs with permit restrictions.

Interview seismic personnel regarding specific permit requirements, the documentation, training and reporting of these permit requirements. Supervisory personnel are aware of any restrictions and have provided this information to the contractor. Any license requirements or restrictions are enforced with the contractor and personnel. Confirm that regulators have been contacted about the project prior to the operations start.

# 1.2 Environmental Planning

# Requirement

Planning of exploration operations shall be undertaken in a manner that will anticipate problems and minimize the effects of the operations on the environment.

effects of the operations on the environment.	effects of the operations on the environment.						
Specific Requirement	Callatastama	Find		Nink Americanist			
Environmental concerns were incorporated during the planning stage of the operation. For example:  • avoiding recognized habitats for marine mammals (e.g. feeding, breeding, calving and spawning areas),  • minimizing acoustic disturbance to cetaceans  • minimizing effects of energy sources, recording cables and anchoring on coral reefs  An Environmental Protection Procedure for Marine Operations document has bee prepared and submitted to NEPA. Considerations of this document include, but are not limited to:  • establishment of buffer zones from shallow reefs, shallow shoals, active fishing areas, special communities and coral islands;  • safety zones are established from the center of the seismic source or arrays;  • ongoing visual monitoring of the safety zone for specified times before survey start up;  • delay procedures when sea turtles, whales or dolphins are identified in the safety zone;  • procedures relating to ramp-up or soft-start of seismic array; and  • inclusion of passive acoustic monitoring before start up or recommencing of seismic activity.	Satisfactory	Not Satisfactory	No Information	Not Applicable			
The Environmental Protection Procedure includes provision for a scouting vessel and a representative of the local fishing community during all seismic activities.							
Seismic surveys have been planned to avoid sensitive times of the year.							
In near-shore areas, an assessment of the environmental resources in undertaken and is documented.							
In near-shore areas, attempts have been made to schedule operations to avoid the							

time periods of high commercial/subsistence fishing and significant recreational activities, and have been documented.		
Environmental planning limits or avoids activity or establishment of landmarks on the foreshore and the floor of the sea.		
Plans exist to limit interruption of commercial or subsistence fishing activities.		
Training of crew in environmental protection procedures is carried out and documented.		

Requirement

Refer to: ARPEL Guideline #14 reference: SEIS 2.0 Environmental Planning; Fisheries and Oceans Canada, 2007. Mitigation of Seismic Noise in the marine environment, Statement of Canadian Practice, found at http://www.dfo-mpo.gc.ca/oceans-habitat/oceans/im-qi/seismic-sismique/statement-enonce\_e.asp

Geophysical programs are generally localized and of limited duration. Operations in shallow/near-shore waters tend to have greater potential for environmental impacts.

Verify that local authorities, experts and/or agencies were contacted for information early in the planning process.

Existing commercial and recreational activities are generally compatible with geophysical operations.

## 1.3 Stakeholder Consultation

During seismic operations, stakeholders such as other marine users, local communities and coastal business owners shall be consulted as appropriate.					
Specific Requirement		Find	ling		
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Consultation and liaison has been undertaken					
with the local communities/groups, the fishing					
industry, environmental groups and other					
external parties.					
Notification of detailed schedule of seismic					
activities is provided to relevant government					
agencies at least 5 days prior to survey commencement.					
Notification of work areas and proposed survey lines is provided to all marine interests					
(government authorities and communities) in					
the local area at least one week before survey					
commencement. Methods include notifying					
government agencies, signs along coastal					
roads, newspaper and electronic media					
notices.					
Issues raised during community consultation					
have been documented.					
Where possible, issue resolution is					
incorporated into planning and operations, or					
is otherwise resolved. Examples include a					
conflict resolution plan, a compensation plan,					
and vessel approach plan.					
If navigation aids have to be placed onshore					
to support marine seismic vessels, local					
authorities are consulted in advance.					

Refer to: ARPEL Guideline #14 SEIS 3.0 Consultation and Liaison; Fisheries and Oceans Canada, 2007.

Mitigation of Seismic Noise in the marine environment, Statement of Canadian Practice, found at <a href="http://www.dfo-mpo.gc.ca/oceans-habitat/oceans/im-gi/seismic-sismique/statement-enonce\_e.asp">http://www.dfo-mpo.gc.ca/oceans-habitat/oceans/im-gi/seismic-sismique/statement-enonce\_e.asp</a>

# 2.0 SEISMIC PROGRAM

# 2.1 Seismic Surveys

Requirement Seismic surveys shall be undertaken so that disturbance to the environment is minimized.						
		Find				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable		
Where explosives are used, mitigation	,			.,		
measures (such as progressive power						
build-up in energy sources) are in						
place to protect fish, marine mammals						
and coral reefs and any residual						
impacts on these resources.						
The lowest possible energy levels are						
used to achieve the objectives of the						
survey.						
Methods to reduce and/or baffle						
unnecessary high frequency noise						
produced by air guns or other acoustic						
energy sources should be used, where						
possible A log book or other method of						
systematically recording environmental						
observations is used by the personnel						
conducting the survey.						
Personnel are trained to take						
appropriate action if marine mammals						
move into the area of operation.						
Seismic start-up should begin at least						
500 metres away.						
If sensitive species are anticipated in						
the area, their presence is monitored						
before the onset of noise creating						
activities, and throughout the seismic						
program. In areas where significant						
impacts to sensitive species are						
anticipated, experienced observers are						
used; In the event of equipment lost						
overboard, reasonable efforts are						
made to retrieve equipment as soon as						
possible after the loss occurs. The						
loss is reported to the appropriate						
regulatory agency.						
Weekly reports to government						
agencies include:						
Locations of lines surveyed to						
date;						
<ul> <li>Observations reports of</li> </ul>						
wildlife;						
Log of environmental						
incidents and actions taken;						
<ul> <li>Log of disposal of waste or</li> </ul>						

other material;  • Log of incidence affecting fisheries and actions taken;  • Loss of equipment; and  • Fuel, oil and cable fluid spills and actions taken.		
A final report is submitted to the appropriate government agency within 2 weeks of completion of the survey.		

Refer to: ARPEL Guideline #14 SEIS 4.0 Seismic Surveys

International Finance Corporation Environmental, Health and Safety Guidelines for Offshore Oil and Gas Development, April 2007. available at:

http://www.ifc.org/ifcext/sustainability.nsf/AttachmentsByTitle/gui EHSGuidelines2007 OffshoreOilandGas/\$FILE /Final+-+Offshore+Oil+and+Gas+Development.pdf

Fisheries and Oceans Canada, 2007. Mitigation of Seismic Noise in the marine environment, Statement of Canadian Practice, found at <a href="http://www.dfo-mpo.gc.ca/oceans-habitat/oceans/im-gi/seismic-sismique/statement-enonce\_e.asp">http://www.dfo-mpo.gc.ca/oceans-habitat/oceans/im-gi/seismic-sismique/statement-enonce\_e.asp</a>

Explosives as an energy source are likely to have more impacts than air gun sources.

#### 2.2 Protection of Intertidal Areas

#### Requirement

Where seismic operations are conducted in intertidal areas special precautions shall be taken as dictated by the sensitivity of the area.

Specific Requirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Appropriate precautions are taken to protect					
the integrity of the intertidal areas.					
Use of drilling mud on the foreshore for					
drilling shot holes for explosive charges, has					
been discussed with, and approved by,					
relevant authorities.					
Inspection programs are in place to ensure					
that no debris is left on the shore.					
Proper authorities are notified if a suspected					
archaeological site is encountered.					

#### Guidance

Refer to: ARPEL Guideline #14 SEIS 5.0 Intertidal Areas; Fisheries and Oceans Canada, 2007. Mitigation of Seismic Noise in the marine environment, Statement of Canadian Practice, found at <a href="http://www.dfo-mpo.gc.ca/oceans-habitat/oceans/im-gi/seismic-sismique/statement-enonce\_e.asp">http://www.dfo-mpo.gc.ca/oceans-habitat/oceans/im-gi/seismic-sismique/statement-enonce\_e.asp</a>

Tidal marshes, mud flats and mangroves can be damaged through changes in salinity, vegetation and erosion resulting from geophysical operations.

Appropriate precautions include:

- did lines follow waterways (tidal channels) or bypass stands of vegetation,
- waterborne transportation used instead of creating new land access,
- a barge mounted base and quarters is used in preference to shore-based facilities,
- speed limits are in effect for watercraft to reduce erosion potential of navigable channels, care was taken
  when using vibroseis vehicles, water tenders and other equipment to prevent undue interference with
  habitats, amenities and commercial interests.

# 2.3 Vessel Operations

# Requirement

The survey vessel and auxiliary craft shall operate according to local regulations and in a manner that minimizes impacts on the environment.

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Where vessels are operating in near-shore or				
inter-tidal areas, operating procedures				
include instructions respecting speed, routes,				
etc., that are designed to reduce the potential				
for erosion, contact with marine mammals				
and commercial or subsistence fisheries.				
Vessels used in seismic operation comply				
with all regulatory and international				
convention requirements for safety and				
pollution response and mitigation as				
stipulated by the Maritime Authority of				
Jamaica.				

#### Guidance

Refer to: ARPEL Guideline #14 SEIS 6.0 Vessel Operations; Fisheries and Oceans Canada, 2007. Mitigation of Seismic Noise in the marine environment, Statement of Canadian Practice, found at <a href="http://www.dfo-mpo.qc.ca/oceans-habitat/oceans/im-qi/seismic-sismique/statement-enonce\_e.asp">http://www.dfo-mpo.qc.ca/oceans-habitat/oceans/im-qi/seismic-sismique/statement-enonce\_e.asp</a>

Inspect vessels and, if possible, observe routine operations to determine if care has been taken to minimize the possibility of spills and other unacceptable discharges of fuels, oils and solvents.

#### 3.0 SPILL PREVENTION AND RESPONSE

### 3.1 Spill Prevention

Specific Requirement	Finding			
•	Satisfactory	Not Satisfactory	No Information	Not Applicable
A spill prevention plan is documented.				
Vessel and survey personnel are trained in				
spill prevention.				
Procedures for refuelling operations are				
posted and communicated.				
Emergency drills have been completed and				
records retained.				

Refer to: ARPEL Guideline #14 SEIS 7.0 Spill Prevention; Fisheries and Oceans Canada, 2007. Mitigation of Seismic Noise in the marine environment, Statement of Canadian Practice, found at <a href="http://www.dfo-mpo.gc.ca/oceans-habitat/oceans/im-gi/seismic-sismigue/statement-enonce\_e.asp">http://www.dfo-mpo.gc.ca/oceans-habitat/oceans/im-gi/seismic-sismigue/statement-enonce\_e.asp</a>

Verify that drip trays or other containment system is placed under equipment containing fuel and/or lubricating oil and cable oil and that the fluids collected are directed to sumps or separators where they are collected for transport to an approved disposal site.

Where significant volumes of oils/solvents are being collected, determine if there are appropriate high level alarms on the sumps or separators.

# 3.2 Spill Response

Considia Danvinamant	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
A spill response plan is documented.	,				
Personnel are familiar with their roles and responsibilities in spill response.					
Vessel and survey personnel are trained in the use of the clean-up equipment and any personal protective equipment.					
Spill reporting procedures are posted.					
Response equipment is appropriate for the products that could be spilled.					
Adequate supplies of sorbent materials are available at locations where spills could be expected to occur.					
Where a spill has taken place, verify that sorbents and other clean-up wastes were disposed of in accordance with regulations and the contingency plan.					
Spill records are maintained, including location, volume, released chemical, response provided, recovery actions, and any follow up.					

Where required, spills have been reported to					
regulators (National Environment and					
Planning Agency) and records retained.					
Guidance					
Refer to: ARPEL Guideline #14 SEIS 8.0 Spill Response; Fisheries and Oceans Canada, 2007. Mitigation of					
Seismic Noise in the marine environment, Statement of Canadian Practice, found at <a href="http://www.dfo-">http://www.dfo-</a>					
mpo.gc.ca/oceans-habitat/oceans/im-gi/seismic-sismigue/statement-enonce e.asp					

# 4.0 CHEMICAL HANDLING AND STORAGE

Requirement Chemicals shall be properly stored and handled to minimize pollution risk.						
Specific Dequirement	Finding					
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable		
All chemicals are labeled.						
Storage procedures comply with those specified by the manufacturer.						
Material safety data sheets provided by the manufacturer are available to the crew.						
Crew are trained in proper handling for individual chemicals. This training includes the use of personal protective equipment.						
Records of chemical purchase, usage, storage and spills are available.						
A record of all chemicals in use and their storage locations is kept and easily accessible.						
Appropriate transfer methods are used when handling or moving chemicals.						
Steps have been taken to use the least hazardous solvents or other hazardous materials.						
Guidance  Pefer to: APPEL Guideline #14 SEIS 9.0 Cher						
Note: IU. ARFEL Guiudille # 14 3213 9.0 CHE	ilical Hallullily al	iu Siuraye				

# 5.0 WASTE MANAGEMENT

Requirement Disposal of wastes shall be carried out in a manner that does not impair environmental quality.					
Specific Requirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
A waste management plan exists, that					
excludes disposal at sea of solid and liquid					
(including sewage) waste.					
Wastes are handled and disposed according					
to the waste management plan.					
Hazardous wastes are segregated from					
domestic and other wastes.					
Hazardous material wastes are handled in					
accordance with the manufacturers'					
directions and/or applicable legislation.					
Crew are trained in the waste management					
plan and proper waste handling.					
There are records of all waste transfers.					
Wastes sent to local facilities have been					
properly transported and disposed, following					
the waste management plan.					
Guidance					

Refer to: ARPEL Guideline #14 SEIS 10.0 Waste Management; Fisheries and Oceans Canada, 2007. Mitigation of Seismic Noise in the marine environment, Statement of Canadian Practice, found at <a href="http://www.dfo-mpo.qc.ca/oceans-habitat/oceans/im-qi/seismic-sismique/statement-enonce\_e.asp">http://www.dfo-mpo.qc.ca/oceans-habitat/oceans/im-qi/seismic-sismique/statement-enonce\_e.asp</a>

# 6.0 ABANDONMENT / CLEANUP OPERATIONS

Requirement Proper cleanup operations shall be implemented upon completion of seismic operations.				
Specific Requirement Finding  Catioforday   Net Satisforday   Net Satisforday   Net Applies				
Specific Requirement	Satisfactory Not Satisfactory No Information Not A			
A clean-up plan exists, covering shoreline, debris, chemicals, etc.				
Guidance				
Refer to: ARPEL Guideline #14 SEIS 11.0 Abandonment Cleanup Operations				

## APPENDIX C - REFINERY OPERATIONS PROTOCOL

This appendix contains audit checklists that were prepared to be used for audits of PCJ's refinery. However, this checklist can be used by other oil and gas companies although they should be adapted to their specific –local- regulatory framework and/or corporate procedures.

Checklist for Conducting Environmental Audits: Refinery Operations

# Prepared for: Petroleum Corporation of Jamaica

The user is encouraged to have at hand the ARPEL Guideline #14 "Guidelines for Conducting Environmental Audits for the Petroleum Industry Operations" (1997), found at <a href="http://portal.arpel.org/apps%5Carpel%5Cml\_lib\_nueva2.nsf/0/0EF86569B866C51003257226006D3465?opendocument&FolderID=4456269EDB93459803257213005F63F0">http://portal.arpel.org/apps%5Carpel%5Cml\_lib\_nueva2.nsf/0/0EF86569B866C51003257226006D3465?opendocument&FolderID=4456269EDB93459803257213005F63F0</a>

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#### 1.0 MANAGEMENT

### 1.1 Approvals

#### Requirement

Required licenses, permits and letters of authority have been obtained for the planning, design, construction and operation of any refining facility. Any special conditions or restrictions are reviewed and enforced.

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Required permits, licenses and regulatory authorizations for the refining facility are available on site.				
Conditions, restrictions and requirements of permits and licenses have been included in facility design and operation.				
Facility operators are aware of the conditions and restrictions, and environmental concerns for the operations of the facility.				

#### Guidance

Refer to: ARPEL Guideline #14 REFIN 1.0 Regulatory Environmental Authorization

Check office and site records for permits and regulatory authorizations.

Check design documents, such as As-Built drawings, for inclusion of any specific environmental management structures.

Check that permits and licenses are available on site.

Check for documentation and reports that address limitations or conditions required by the permits, such as:

- Annual monitoring programs for soil and water
- Air monitoring reports for stack temperature or air quality exceedence reports
- Surface water management and release reports
- Spill reports

Interview refinery operators regarding specific permit requirements, the documentation, training and reporting of these permit requirements.

## 1.2 Design and Planning

#### Requirement

Environmental protection and mitigation are considered and incorporated into site and facility planning, prior to construction. Operating procedures incorporate and document management and mitigation processes for environmental concerns.

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Environmental concerns were considered				
during the selection of the facility site or				
placement of process trains or vessels.				
Process documentation exists, including				
potential pollutants, mitigation measures, and				
environmental controls.				
Operating procedures include mitigation of				
potential environmental impacts.				
Facility siting avoids environmentally				
significant locations.				

Call provention is considered in angineering		
Spill prevention is considered in engineering		
design.		
3		

Refer to: ARPEL Guideline #14 REFIN 3.0 Environmental Concerns; REFIN 6.0 Processing

#### Check for:

- environmental impact assessments, including assessment of:
  - terrestrial resources including soil, vegetation, wetlands and wildlife
  - water resources including surface water quality and quantity, river beds, marine water and shore and groundwater
  - marine wildlife
  - air quality modeling
  - noise, health and human impact assessment
- zoning and planning documents
- surface water management plans and facilities
- dedicated process drains
- transportation plans or traffic assessments
- minimizing contact with urban settlements
- soil conservation and reclamation plans
- process documentation including environmental mitigations

# 1.3 Site Security

## Requirement

Access control shall be implemented for safety and to minimize additional disturbances to the environment where local population, livestock and wildlife encroachment may interact with a refinery.

Specific Requirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Access is controlled through appropriate use of					
fences, signs or gates.					
A visitor log is kept and is part of emergency					
response planning.					
Signs are clearly legible and posted as needed					
and maintained.					
Fences and gates are in good condition.					

#### Guidance

Refer to: ARPEL Guideline #14 REFIN 18.0 Access Control

#### 1.4 Training

#### Requirement

Refinery operating personnel are trained and aware of the environmental impacts of their operations. Personnel understand the necessity for environmental planning and protection measures.

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Personnel have taken environmental training in				
their field of operations and are clear on how to				
implement and use their training correctly.				
Personnel update their training yearly, or as				
required by law.				
Environmental training manuals and reference				
programs are available.				

Funds are made available annually for environmental training.		
Training records are up-to-date.		

Refer to: ARPEL Guideline #14 REFIN 2.0 Personnel Training

Check that training guidelines for each job exist.

Check training records for personnel and ensure they are up to date.

Confirm that personnel are trained for the environmental requirements of their job and as per the guidelines. For example:

- emergency response/spill containment training,
- waste management,
- hazardous materials handling specifications,
- transportation of dangerous good guidelines,
- current regulatory requirements and best operating procedures.

Identify the system by which personnel are reminded to update training – are records available?

Check the reference library for manuals and guidelines.

Check each department for appropriate training manuals.

Interview managers and personnel regarding training schedules and funding.

#### 1.5 Records

Requirement A comprehensive records management system is in place.					
Specific Requirement		Fin	nding		
	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Version control is in place for procedures.					
Up to date engineering drawings are on file,					
including as-built drawings					
Guidance					
See ISO 14001 records management questions.					

## 2.0 SPILL PREVENTION

# 2.1 General Spill Prevention and Site Housekeeping

Requirement All sites shall be maintained properly and kept neat, clean and safe.					
Specific Dequirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Site is kept neat, tidy and free from litter and					
waste equipment.					
General housekeeping is focused on					
reducing drips, spills, overflow or other loss.					
Process area drains go to either recovery					
tanks or impermeable and/or lined retention					
pond for appropriate disposal (and do not					
drain to ground or directly to surface water).					
Vegetation control is being used appropriately					
on site in order to minimize fire hazards and					
to provide easy access for maintenance.					
Lighting is sufficient for operating procedures.					
Facilities and operations have equipment and					
procedures in place to prevent spillage or					
reduce impacts to the environment as a result					
of a spill.					
Pressure relief valves, rupture disks or burst					
plates that are installed on filter vessels or					
treaters are connected by suitable piping to					
an open pop or release tank.					
Guidance					

Refer to: ARPEL Guideline #14 REFIN 20.0 Housekeeping

Housekeeping refers to the general maintenance of a site with respect to acceptable operating practices, upkeep maintenance and overall orderliness of the grounds, buildings and equipment.

Mechanical methods of vegetation control are usually preferred but chemical methods can be used in some circumstances. Chemical methods are not recommended where there is a high water table or marine shore.

# 2.2 Integrity Management Program

Requirement				
An integrity management program is required.				
Specific Requirement		Find	ing	
<u>'</u>	Satisfactory	Not Satisfactory	No Information	Not Applicable
An integrity management plan is in place,				
including cathodic protection, pipeline				
integrity, tank testing and inspection, leak				
detection, and volume metering.				
A company protocol for cathodic protection				
on underground facilities has been				
established.				
Appropriate cathodic protection methods				
have been implemented (see guidance				
below).				

Refer to: ARPEL Guideline #14 REFIN 9.0 Cathodic Protection; REFIN 32.0 Release/Spill Prevention; REFIN 13.0 Product Storage

Cathodic protection can be applied by two methods: sacrificial or impressed current methods. Sacrificial anodes are most commonly used on small steel structures such as tanks; however, the method has also been used on short pipelines. Impressed current cathodic protection is typically used on pipelines which cover a large distance.

See also sections on Aboveground Storage Tanks and Underground Storage Tanks, for leak detection management and tank testing.

# 2.3 Preventive Maintenance

A preventive maintenance (PM) program is det	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Regular maintenance/turnaround schedules exist and are followed.	Julisiacióny	Not Sutisfactory	140 mormation	Not Applicable	
Monitoring of dedicated recovery tanks or ponds is carried out to ensure no overflow or leakage.					
<ul> <li>PM program includes:         <ul> <li>Routine inspections of vessels (e.g., tanks, knockout drums, etc.,), meters, pressure relief valves, etc.</li> <li>Modification of existing processes or vessels to prevent spills</li> <li>Corrosion control and monitoring</li> <li>Leak detection and automatic shutdown systems</li> <li>Regular inspection and maintenance of containment facilities such as berms, drip pans, dedicated drains, etc.</li> </ul> </li> </ul>					
Procedures are undertaken by operators to ensure all equipment is in proper working order. Procedures may include leak detection, corrosion evaluation, metering assessment, etc.					
Maintenance procedures are documented.  Operators are trained in maintenance					
procedures.  Maintenance procedures and schedules are followed.					
Maintenance records are kept.  Meter stations are calibrated and inspected on a regular basis, and flow measurements are analyzed to ensure early detection of product or feedstock loss.					

#### Requirement

A preventive maintenance (PM) program is detailed for all processes and implementation is documented.

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable

#### Guidance

Refer to: ARPEL Guideline #14 REFIN 7.0 Filter Vessels and Treaters; REFIN 16.0 Site Maintenance

#### Check for:

- filter vessels and treaters are maintained.
- signs of spills

Other methods to prevent oil spills are acceptable if they provide equivalent or better protection than the venting of relief devices to an open pop or release tank.

# 2.4 Facility Marking

#### Requirement Tanks and distribution lines shall be located such that they cannot be easily damaged by moving equipment. Design techniques must be employed to prevent pressure eruptions and reduce fire hazards. Finding Specific Requirement Satisfactory Not Satisfactory No Information Not Applicable Documented procedures are in place describing marking and protection of buried or surface pipelines such as site security and anti-corrosion programs. Lines are marked and maintained and records are checked before any excavations are started. Underground distribution lines are marked on engineering drawings and located before excavation work. Engineering design and operations of a pipeline utilizes emergency valve shut-off and leak detection programs and procedures. Pipeline systems are inspected for such items as placement of shut-off valves, marked facilities, erosion control, vegetation management and spill cleanup. Inspections are documented and reported. Guidance Refer to: ARPEL Guideline # 14 REFIN 12.0 Distribution Lines

#### 3.0 EMERGENCY RESPONSE

## 3.1 Emergency Response Plan

#### Requirement

An Emergency Response Plan exists to protect the public, employees, the environment and property should an emergency occur.

Specific Requirement	Finding				
	Satisfactory	Not Satisfactory	No Information	Not Applicable	
An appropriate up-to-date emergency					
response plan exists and is available on-site.					
Employees are trained in the Emergency					
Response procedures.					
Emergency drills are held at least once a					
year, and records are retained on the					
learnings from the drill.					
The Emergency Response Plan has been					
communicated to local emergency					
responders and organizations with whom a					
mutual-aid agreement is in place.					
Regular communication on emergency					
preparedness with neighbouring communities					
takes place and consultations are					
documented.					

#### Guidance

Refer to: ARPEL Guideline #14 REFIN 34.0 Emergency Response

An Emergency Response Plan should contain the following information:

- a Regulatory Information
- b Scope of the Emergency Plan
- c Local public involvement
- d Contents of the Emergency Procedure Plan:
  - An introduction which clearly indicates which facilities are covered by the plan, the size of the emergency planning zone and the potential H<sub>2</sub>S release rates (if applicable).
  - An emergency definition and action plan which identifies the different stages or levels of alert and the action necessary.
  - Detection and location of a release which describes the various methods by which a release may be detected.
  - Definition and isolation of a hazard area.
  - Communication procedures between the release site, the company control center, government agencies and public representatives.
  - Evacuation and notification procedures.
  - Ignition procedures.
  - Control procedures to take control or shut-in the release.
  - Responsibilities of company personnel.
  - Responsibilities of government agencies.
  - Media relations to give personnel direction when dealing with the news media.
  - Post-emergency procedures.
  - Procedures to update the plan on an annual basis.
  - Emergency contact lists.
  - Overall site plan.

All material and equipment specified in the Emergency Response Plan is available onsite.

## 3.2 Spill Response

## Requirement A comprehensive spill response plan is in place to limit impact to the environment. Specific Requirement Satisfactory Not Satisfactory No Information Not Applicable There is a spill/release contingency plan for the refinery. Personnel are familiar with the plan and their roles and responsibilities in spill response. Spill response training is provided to all appropriate site personnel, and training records are kept. Spill response training includes information on disposal of materials used to manage and contain the spilled material. Spill response and process shut down processes are practised on a regular basis, and records are available for review. Results of practice drills are incorporated into spill response planning and training. Spill response kits are complete and easily accessible. Spills are contained appropriately for the chemical in questions, according to MSDS protocols. Spill records are maintained, including location, volume, released chemical, response provided, recovery actions and any follow up. All storage areas have spill containment and spill recovery systems such as berms, spill drains, spill recovery collection tanks and oil recovery technology.

#### Guidance

Refer to: ARPEL Guideline # 14 REFIN 13.0 Product Storage; REFIN 33.0 Spill/Release Contingency Plans; REFIN 22.0 Release of Hydrocarbons; REFIN 32.0 Release/Spill Prevention

The contents of the spill emergency response contingency plan include the following information:

- a A definition of the emergencies covered by the plan.
- b The procedures for handling and investigating leakage reports.
- c The procedure for alerting company personnel and affected outside parties.
- d A clear definition of the responsibilities of everyone involved.
- e Guidelines for reaction and control, including shut-down procedures, leak locations, leak isolation, spillage/release containment, watercourse protection, etc.
- Methods for immediate corrective action including spill/release control containment recovery, restoration and rehabilitation of the affected resource.
- g Guidelines for the protection of operating personnel and the general public.
- h Safe work procedures for pipeline repair.
- i Guidelines for post-repair inspection and returning the line to service.
- i Maps and descriptions of each subsection of the pipeline system.
- k Guidelines for public relations and the dissemination of information.
- A telephone contacts summary.

Determine locations, types and quantities of spill control materials available onsite. These may include: sorbent materials, oil retention booms, sand bags or temporary curbing devices, recovery pumps and collection hoses, recovery tank trucks and protective equipment.

Review any past incident reports. If there have been any releases in the past, a review should be undertaken to review the causes of the release and to provide recommendations as to how such a release can be avoided in the future. The review should include an assessment of the contingency plan and the response as well, assessing whether there should be any improvements made to the plan or the training provided.

Spill response kits may include: sorbent materials, oil retention booms, sand bags or temporary curbing devices, recovery pumps and collection hoses, recovery tank trucks and protective equipment.

Spill records include the location and size of any spills, the environmental receptor (soil, surface water, marine water, etc.), the measures taken to control and remediate the spill, and any volume recovered. A sketch of the spill area is valuable.

#### 4.0 **AIR**

#### 4.1 **Emissions Control Program**

Requirement Gaseous emissions in refining facilities shall be controlled and minimized.					
Specific Requirement	Finding				
	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Local regulations regarding gaseous					
emissions have been identified and provided					
as guidelines for emissions control program					
implementation in the facility.					
The emission control program considers					
greenhouse gases, ground-level ozone,					
nitrogen oxides, hydrocarbons, sulfur oxides,					
carbon monoxide, particulates, and may					
consider other emissions.					
The gaseous emission control program					
contains both ambient air monitoring objects					
and emission monitoring objectives.					
The emission control program includes					
emergency response planning and					
communication with surrounding residents					
and employees.					
The emission control program includes focus					
on energy efficiencies and feasible reductions					
in older facilities, and engineering design and					
inclusion of effective emission reduction					
technologies in new facilities.					
Loadout operations include vapor recovery					
technologies, as per ARPEL Guideline #7,					
Reduction and Control of Gaseous Emissions					
from Petroleum Refineries, pages 90-911.					
Flare system design, operation and facilities					
consider combustion and emission controls					
as per ARPEL Guideline #7, pages 22 – 34.					
The emission control program includes a					
progressive approach to fugitive emission					
reduction, capture and recovery, as per					
ARPEL Guideline #7, pages 61 – 74.					
Guidance					

Refer to: ARPEL Guideline #14 REFIN 30.0 Gaseous Emissions

If local guidelines do not exist, ARPEL Guideline #7 provides the components of an emissions control program.

Ways to reduce gaseous emissions may include:

- a Increasing efficiency per unit of energy produced
- b Reducing sources of emission in all operations
- c Air quality monitoring, reporting and tracking systems (measured quantities of emissions, reports, etc.)

 $\underline{\text{http://portal.arpel.org/apps\%5Carpel\%5Cml\ lib\ nueva2.nsf/0/8A6BB0B9020ADD2F03257226006D3467?opendocument\&F\ olderID=F7016BE453531A560325721200658405}$ 

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# 4.2 Air Quality Monitoring

#### Requirement

Air quality monitoring is required at some locations of the facility to comply with existing regulations or when due to resident or landowner concerns.

Specific Requirement	Finding			
	Satisfactory	Not Satisfactory	No Information	Not Applicable
Monitoring guidelines are in place for both				
ambient air and emission source air quality.				
Ambient air monitoring is carried out on a regular				
basis, and results are recorded and compared to				
the criteria in ARPEL Guideline #7, Appendix A.				
Air emission monitoring is carried out on a regular				
basis, and results are recorded and compared to				
the criteria in ARPEL Guideline #7, Page 12.				
Fugitive emissions monitoring equipment is				
maintained, calibrated and tested on a regular				
basis (ARPEL guideline #7, Page 71).				
Monitoring results are recorded and reported.				
Odours are minimized.				
Culdenes				

#### Guidance

Refer to: ARPEL Guideline #14 REFIN 31.0 Air Quality Monitoring. If local guidelines do not exist, ARPEL Guideline #7 provides the components of an emissions control program.

Long term emissions can have an adverse impact on soil and water.

Monitoring and reporting requirements may include:

- a Standard site criteria for monitoring
- b Documentation
- c Total sulphation calculations
- d Hydrogen sulphide calculations
- e Water soluble fluoride calculations
- f Dustfall calculations
- g Soil pH monitoring procedures
- h High volume sampling procedures
- i Vegetation fluoride analysis
- i Quality assurance procedures
- k Heavy metals analysis
- I Source emission survey report format

Air quality sampling is done with many different pieces of equipment including mobile trailers, stationary trailers and "birdhouses". Verify that sampling equipment is in working order and correctly calibrated.

#### 4.3 Flare Stacks

Requirement Flare stacks are designed and operated to minimize impact to the environment.				
Specific Requirement	Finding			
	Satisfactory	Not Satisfactory	No Information	Not Applicable
Flare stack design incorporates current				
emission targets.				
Flare stacks are located with appropriate set				
backs to buildings, residences, trees, and				
other facilities.				

Operational requirements for flare stacks are				
met (e.g., continuous flare or automatic				
ignition system, alarm, combustion				
temperature monitoring, etc.)				
A liquids separation unit (knock out drum) is				
part of the flare system, and is operational.				
The separated liquids are recovered out of				
the separation unit, not sent to flare.				
Records of liquid recovery are available.				
Liquid separation units have an overflow shut				
down system, and it is operational.				
0	·	<u> </u>	•	·

Refer to: ARPEL Guideline #14 REFIN 21.0 Flare Stacks;

ARPEL Guideline #7, Reduction and Control of Gaseous Emissions from Petroleum Refineries.

Inspect the location of flare stacks to see if liquids have sprayed off the stack.

Free liquids can escape up the flare stack to pollute the land.

# 4.4 Hydrocarbon Emission Capture

Requirement All hydrocarbon release points shall be piped into a vapor recovery unit.					
Specific Requirement	Finding				
	Satisfactory	Not Satisfactory	No Information	Not Applicable	
The utilization and placement of vapor					
recovery units is marked on engineering					
drawings.					
Vapor recovery units are operational.					
Collected vapors are incinerated.					
Records are kept of incineration of					
hydrocarbon vapors.					
Guidance					
Refer to: ARPEL Guideline #14 REFIN 14.0 Vapor Recovery Units					

# 4.5 Sulfur Emission Control

Requirement

environment.					
Specific Dequirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Specific emission rates are included in plant					
licenses, and licenses are available on site.					
Emission rates are monitored and results are					
recorded.					
Stack surveys are completed annually.					
Temperature monitoring is carried out on a					
regular basis and recorded.					
Sulfur is transported safely and dust control					
measures are in place.					

Sulfur loading procedures are documented			
and communicated to facility staff.			
Impact of sulfur dust on adjacent soil,			
vegetation and surface water quality is		ļ	
monitored and results are recorded.		ļ	
Cuidanas			

Refer to: ARPEL Guideline #14 REFIN 8.0 Sulfur Recovery

## Check for:

- License requirements.
- Operations manuals for sulfur recovery equipment including stacks.

## 4.6 Noise

Specific Dequirement		Find	ing	
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Sources of noise are documented.				
Noise guidelines are applicable and implemented.				
Noise abatement processes are considered in design.				
Consultation with neighbouring residents is documented and reported.				
Public complaints are documented and responded to.				
Ambient sound surveys to measure existing sound levels have been completed where appropriate.				

#### 5.0 STORAGE AND HANDLING OF FUEL AND CHEMICALS

## 5.1 Chemical and Hazardous Materials Storage and Handling

## Requirement

All chemicals and hazardous materials are stored safely and labeled properly such that impact to the environment is minimized.

Chemical and hazardous materials shall be stored and labeled properly.

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
All chemicals are labeled on the container.				
A record of all chemicals in use in the				
refinery and their storage locations is kept				
and easily accessible.				
A materials safety data sheet system is in				
use, to clearly identify chemicals and proper				
handling.				
Operations workers are trained in proper				
handling and storage of specific chemicals in				
use in the refinery. This training includes the				
use of personal protective equipment.				
Appropriate transfer methods are used when				
handling or moving chemicals.				
Chemical volumes are recorded and usage is				
tracked.				

#### Guidance

Refer to: ARPEL Guideline #14 reference: REFIN 15.0 Chemical and Hazardous Material Storage and Handling.

Chemical storage and handling may have many components:

- a Bulk tanks should be used for storage whenever treatment/corrosion chemicals are routinely added to process lines, regardless of volumes consumed.
- b All tanks should be fitted with an external gauge to monitor content level. The tank must be externally vented if located in a building.
- c All metal storage/bulk tanks and/or frames should be electrically grounded.
- d Tanks larger than 500-1000 barrels should be bermed or an equally effective means identified to prevent excessive contaminations to the surrounding area in the event of a major spill or tank fracture.
- e Bulk storage tanks should be clearly labeled to identify contents.
- f When wall mounted drums (45 gallon) are used as bulk tanks, the refilling process should be carried out using a barrel transfer pump. The barrel pump construction should be suitable for use with the specific chemical. Barrel pumps and both containers involved in the transfer should be grounded.
- g Spill containment pans or facilities are in place below drums or smaller tanks.
- h Small quantities of chemicals are stored under a shelter, with ventilation and spill containment.
- i consideration is given to separating the storage areas of chemicals which might adversely react with each other should an accidental release occur.

Manual handling of chemicals is discouraged. The transportation of chemicals or empty chemical containers inside buildings or closed vehicles must be avoided. Open top trucks or the equivalent should be used when transporting chemicals. If a non-routine manual chemical treatment is required, then the workers are required to:

- a Wear full personal protective equipment specific to the particular chemical being handled. Suitable respiratory protective equipment should be readily available and used when toxic or volatile chemicals have been identified in a product.
- b Use pails with tight fitting lids.
- c Chemical drums or pails must be secured and sealed to prevent spillage during vehicle transport.

## 5.2 Pipeline, Truck and Rail Loading / Unloading

## Requirement Loading and unloading procedures shall be performed in a manner that prevents pollution to the environment. Finding Specific Requirement Satisfactory Not Satisfactory No Information Not Applicable Pipeline, truck and rail car bulk receipt of raw and produced products shall have environmental control systems in place (such as emergency shut down systems, gauges, lock out valves, etc.) to effectively store, handle and transfer product in an environmentally safe manner. Tanks, trucks and trailers shall be properly maintained, and service records are kept. Operators have been trained in transportation safety and environmental protection. Facility personnel are in continuous attendance when trucks are loading and unloading. Spill containment facilities are incorporated into the loading facilities. Interlock warning lights are used in loading and unloading areas to prevent the departure of trucks before lines are disconnected. All loading facilities are designed to prevent or reduce accidental discharge. Guidance

Refer to: ARPEL Guideline #14: REFIN 10.0 Bulk Product Receipt and Delivery

- Determine hours trucks should be operating.
- Through interviews, determine driver training effectiveness including training in transportation of dangerous goods, spill response, etc.
- Inspect the loading areas to assess general housekeeping, control and cleanup of leaks and assess transfer operations which are in progress.

## 5.3 Marine Terminal Transfer Operations

Requirement  Loading and unloading procedures shall be performed in a manner that prevents pollution to the environment.					
Specific Requirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Pipeline receipt or transfer of raw and produced products shall have environmental control systems in place (such as emergency shut down systems, gauges, lock out valves, etc.) to effectively store, handle and transfer product in an environmentally safe manner.					
Pigging facilities are maintained and pigging fluids are contained and disposed of according to the waste management plan.					
Aboveground pipelines are inspected on a regular schedules basis, and results are recorded.					

Volume reconciliations as a measure of				
pipeline integrity are recorded.				
Guidance				
Refer to: ARPEL Guideline # 25 Control of Con	ntamination from N	Marine Terminals <sup>2</sup>	: 7.0 Marine Term	inal Transfer
Operation				

# 5.4 Aboveground Storage Tanks (ASTs)

## Requirement

Operation of aboveground tanks shall be carried out in a manner that does not cause damage to the environment. Tank operations include all work which is done in conjunction with tanks. Examples are gauging, loading and unloading of tanks and emergency containment.

Specific Requirement		Find	ing	
·	Satisfactory	Not Satisfactory	No Information	Not Applicable
A shop-fabricated aboveground storage tank				
system:				
<ul> <li>has corrosion protection</li> </ul>				
<ul> <li>has a secondary containment system</li> </ul>				
<ul> <li>has leak detection</li> </ul>				
<ul> <li>has containment sumps, as applicable</li> </ul>				
<ul> <li>where a high-level alarm system is</li> </ul>				
used, have audible and visual alarms				
located where personnel are constantly				
on duty during the product transfer				
operation and can promptly stop or				
divert delivery to the tank				
A horizontal storage tank is supported above				
grade level.				
Storage areas are clearly marked with signs				
and labeling on tanks.				
Aboveground tanks must be located within				
an impervious containment system				
sufficiently large to accommodate 100% of				
the largest tank volume. The capacity of the diked area must be calculated by deducting				
the volume of the tanks other than the largest				
tank (below the height of the dike).				
If any produced liquids enter the diked area,				
they must be collected and disposed of in an				
acceptable manner.				
Containment systems are maintained and				
monitored for leaks on a regular basis.				
Results of leak monitoring are documented				
and reported.				
Tanks are painted with a protective coating to				
prevent corrosion or rusting				
Periodic inspections of tanks, leak detection				
systems and dikes are conducted and results				
are recorded.				

2

Aboveground tanks are protected against impact from a motor vehicle.		
Where a tank is located in an area subject to buoyancy because of flooding, uplift protection is provided.		
Aboveground tanks are not filled in excess of 95% of their capacity.		
Operators are trained to incorporate measures to prevent the overfilling of tanks. These may include automatic shut-off devices, alarms or visual indicators.		

Refer to: ARPEL Guideline # 14 REFIN 11.0 Tank Operations; ARPEL Guideline #18, Guideline for Control of Contamination from Aboveground Storage Tanks<sup>3</sup>

International Fire Code (2006), Chapter 34 (Flammable and Combustible Liquids)

A leak detection system can include:

- a A synthetic liner with a monitoring well.
- b Annual interstitial monitoring of double walled tanks.
- c Annual visual detection of vaulted tanks.
- d Monthly monitoring of weeping tile systems if the soil is of low permeability.

Special testing programs for tanks may include: 100% external inspection, internal inspection, hydrostatic leak tests, soil vapor and ground water monitoring or another method that provides the same level of confidence.

# 5.5 Underground Storage Tanks (USTs)

## Requirement

Operation of underground tanks shall be carried out in a manner that does not cause damage to the environment. Tank operations include all work which is done in conjunction with tanks. Examples are gauging, disposing of tank bottoms, loading and unloading of tanks and emergency containment.

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Tank storage areas are clearly marked with				
signs.				
Underground tanks (USTs) are double				
walled.				
If USTs are single walled, they have				
secondary containment structures.				
A leak detection system on tanks is in place				
and regularly monitored.				
Results of leak monitoring are documented				
and reported.				
Operators incorporate measures to prevent				
the overfilling of tanks. This may include				
automatic shut-off devices, alarms or visual				
indicators.				

3

Periodic inspections of tanks, leak detection systems and liners are conducted and recorded.		
Appropriate testing of USTs is undertaken on a regular basis, and results are documented and reported.		
A reporting and documentation process exists in case of leaking from USTs.		

Refer to : ARPEL Guideline # 14 REFIN 11.0 Tank Operations

ARPEL Guideline #8, 2nd Edition, Guideline for Control of Contamination from Underground Storage Tanks4

Underground tanks do not require secondary containment if the site exhibits low permeability soil plus a seasonally high groundwater table that is not within 1m of the bottom of the tank.

Secondary containment for underground storage tanks includes:

- a Double wall tanks where the void space may be monitored.
- b An impervious synthetic liner that is compatible with the product being stored.
- c Tanks contained in reinforced concrete or steel vaults.
- d Any other system that provides the same level of protection as those listed above.

Suitable testing of underground storage tanks includes: internal inspection, hydrostatic leak tests, pneumatic leak tests, soil vapor and groundwater monitoring, or another method that provides the same level of confidence.

Inspect any logbooks or incident reports.

,

#### 6.0 SOILS

## Requirement

Soil sampling and monitoring protocols are in place according to guidelines. Sampling programs and results are documented and documentation is retained.

Specific Requirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
A soil sampling monitoring program is in					
place to meet the regulations or guidelines.					
Records of soil sampling and monitoring					
programs are available.					
Soil conditions associated with leaking tanks					
or spills have been investigated and reports					
are available for review.					
Where appropriate, soil investigation reports					
have been distributed to regulators.					
Where appropriate, soil remediation			_		
programs have been undertaken.					

#### Guidance

Refer to: ARPEL Guideline #14 REFIN 27.0 Soil Sampling and Monitoring; ARPEL Environmental Guideline #37, Integrated Management of Wastes in Downstream Facilities, 2005<sup>5</sup>.; ARPEL Environmental Guideline #3, Management of Petroleum Refinery Solid Waste<sup>6</sup>.

Soil monitoring activities may be completed to track the progress of a decontamination program, to determine the extent of a spill and develop remediation programs. Soil monitoring may be undertaken at any time of a facility's life, from pre-disturbance, during operations or during reclamation. Common areas for soil monitoring programs include:

- Aboveground and underground storage tanks sites;
- Load out facilities;
- · Process facilities.

5

 $\underline{\text{http://portal.arpel.org/apps\%5Carpel\%5Cml\_lib\_nueva2.nsf/0/784D413A933C121403257226006D3593?opendocument\&Fol\_derlD=268685024B8220F903257213005F3616}$ 

 $\underline{\text{http://portal.arpel.org/apps\%5Carpel\%5Cml\_lib\_nueva2.nsf/0/D409D514494EF57503257226006D3466?opendocument\&Fol\_derlD=268685024B8220F903257213005F3616}$ 

## 7.0 WATER AND WASTEWATER

#### 7.1 Groundwater

## Requirement

A groundwater monitoring system will be in place, to determine any on site contamination of groundwater, or possible off site movement.

Specific Requirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
A groundwater sampling and monitoring					
program is in place to meet the regulations or					
guidelines.					
Records of groundwater sampling and					
monitoring programs are available.					
Stakeholder consultation regarding programs					
and results is documented.					
Wells are capped and maintained.					
Sampling protocols exist and sampling					
personnel are trained in sampling techniques,					
including chain of custody requirements.					
Analytical protocols are appropriate for					
potential sources.					
Groundwater monitoring wells are					
decommissioned when no longer required.					
Groundwater conditions associated with					
leaking tanks and spills have been					
investigated.					
Where appropriate, groundwater					
investigation reports have been distributed to					
regulators.					
Where appropriate, groundwater remediation					
programs have been undertaken.					

#### Guidance

Refer to: ARPEL Guideline #14 REFIN 28.0 Groundwater Monitoring

Groundwater monitoring is a site specific issue. Wells should be installed hydraulically up gradient and down gradient of a potential contaminant. These wells will be used to determine the depth and direction of groundwater flow. Monitoring wells must be set in an area that will not interfere with everyday operations, however, they must be set in order to collect the required information.

## 7.2 Water Conservation

## Requirement

All water usage shall be assessed for the potential of recycling or reuse. Water usage shall be minimized by employing the basic principles of water conservation through reduction of the volume of water used, effective recycling, and maximizing reuse. Emphasis should be placed on concentrating waste materials in limited volumes of water.

Specific Requirement	Finding				
	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Water usage at the refinery has been					
assessed and documented					
Water usage is monitored					
Reasonable reduction targets have been set					
Conservation efforts are in place					

Refer to ARPEL Guideline #14, REFIN 45.0 Water Recycling and Reuse

## 7.3 Stormwater Management

#### Requirement Stormwater run-on and run-off must be controlled to minimize contamination of local water bodies. Finding Specific Requirement Satisfactory Not Satisfactory No Information Not Applicable Stormwater is segregated from industrial process water The facility complies with stormwater monitoring requirements Surface water control and release structures exist and are shut to prevent accidental release of runoff water If in use, perimeter berms are place appropriately to divert surface water run off from impacting (erosion, contamination, etc.) adjacent soil, water or wetlands. Interception ditches are in place and are linked to surface water holding ponds. Guidance Refer to ARPEL Guideline #14, REFIN 26.0 Surface Water Monitoring ARPEL Guideline #14, REFIN 24.0 Drainage and Erosion ARPEL Guideline #14, REFIN 19.0 Perimeter Berms

#### 7.4 Stormwater and Industrial Wastewater Ponds

## Requirement

Ponds shall be used to collect surface runoff, process liquids (potentially oily water) and industrial wastewater. Collected liquids will be managed through treatment, sampling and analysis to ensure liquid in each pond meets criteria before releasing, treating or disposing.

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Pond and associated equipment design is in compliance with API procedures and regulations or any other acceptable standards.				
Ponds are constructed from a compacted bentonite or in-situ clay with a hydraulic conductivity no greater than 1x10 <sup>-7</sup> cm/s or other low permeability material. Otherwise, ponds must have an impermeable liner or be constructed of concrete				
Pond design and operations incorporate facilities or procedures to separate floatables such as oil (i.e., skimming, floatation, separation, treating and pumping equipment).				

Ponds are situated to match the natural drainage of the site topography and graded to minimize erosion and flooding.		
Ponds are designed to control the rainfall established from meteorological statistics for that area.		
Separate ponds are used for each type of fluid stream collected (i.e., oily water pond, surface runoff pond, etc.). Measures are taken to avoid cross contamination between ponds.		
Pond levels are monitored and pumped off routinely to ensure no overflow occurs.		

#### Refer to

- ARPEL Environmental Guideline #37, Integrated Management of Wastes in Downstream Facilities, 2005.
- API document, "Laboratory Analysis of Petroleum Industry Wastewaters" 1999. Accessed at http://www.api.org/ehs/water/upload/4694-1999.pdf
- ARPEL Guideline #14, REFIN 25.0 Surface Retention/ Holding/Industrial Runoff Ponds

# 7.5 Surface Water Monitoring

Requirement Adjacent surface water shall be monitored after spills, after controlled acceptable releases and as required to monitor water quality.				
Specific Requirement		Find	ling	
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Legislated requirements and guidelines				
regarding surface water quality have been				
identified and are available on site.				
Sampling protocols are in place and are				
followed.				
A reputable laboratory performs analyses of				
surface water.				
Records of surface water monitoring events				
and results are kept.				
Monitoring results comply with				
legislation/guidelines.				
Guidance				
Refer to ARPEL Guideline #14, REFIN 26.0 Su	rface Water Mon	itoring		

## 7.6 Water Release

Requirement				
Discharge of water to the environment shall be minimized.				
Specific Requirement		Find	ling	
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Legislation and guidelines regarding water				
releases have been identified and are known				
to facility personnel. Minimum standards are				
ARPEL Guideline #14 (see below)				

There is documentation and a reporting				
procedure for water discharges to the environment.				
Procedure is established and communicated				
for managing water that doesn't meet release				
standards.				
Sampling personnel are trained in field				
sampling and analysis techniques				
Field sampling and analysis occurs before a				
water release and results are documented				
and retained. Records include the analytical				
parameters listed below, as well as an				
estimation of the volumes of water released.				
Water discharged is not allowed to flow				
directly into rivers, creeks or				
any other permanent body of water				
Codelana	·	·	·	·

Refer to ARPEL Guideline #14, REFIN 29.0 Water Release

Surface water samples must meet the following minimum standards before release:

- a Water pH must be between 6.0 9.0.
- b Oil and grease cannot exceed 10 mg/L or no visible hydrocarbon sheen on the water surface.
- c Chlorides must not exceed 500 mg/L.
- d No other chemical contamination.

If the discharged water does not meet the above criteria, the fluid must be disposed of at an approved waste disposal facility or treated and then discharged with the approval of existing regulatory agencies.

#### 7.7 Industrial Wastewater

## Requirement

No effluent shall be discharged unless it meets minimum requirements of existing local regulations. Regulations usually limit the deposits of oil and grease, phenols, sulphide, ammonia nitrogen, total suspended solids and the pH levels. The wastewaters from the various units should be diverted to the wastewater treatment facility.

Refinery plants shall comply with effluent monitoring requirements according to existing local regulations.

Specific Requirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Wastewater treatment/disposal is in					
compliance with applicable legislation					
The flow through the effluent treatment					
system is carefully controlled.					
The facility complies with effluent monitoring					
requirements. Legislation may require that a					
number of pollutants be monitored to					
demonstrate that the effluent treatment					
system is being operated consistently.					
Oil skimmer units are in place on process					
related ponds or water catchment areas.					
Disposal of pumped-off liquids is in					
accordance with the content of the liquids and					
any contamination.					

A refinery may be given an exemption from the requirements for liquid effluent once-through cooling water if treatment is provided in facilities outside the refinery (such as municipal sewage systems). This exemption may be granted if the off-site facility provides treatment equivalent to that required by the regulations and guidelines.

The best practicable treatment technology to the liquid effluents can be described as:

- Sour water stripping for ammonia and sulphide removal;
- Primary separation followed by;
- Intermediate treatment (such as air flotation) followed by:
- Secondary treatment (such as biological treatment)
- Final effluent clarification if required

The following pollutants may be required to be monitored by refinery plants:

- Daily monitoring:
- Total suspended solids
- Phenolics
- pH and total organic carbon

Three times per week basis:

- Ammonia-nitrogen
- Organic carbon
- Oil and grease
- Sulphides
- Volatile aromatics (benzene, toluene, xylenes, ethylbenzene)
- Zinc and chromium

#### Monthly:

- aromatic hydrocarbons
- chlorinated volatiles
- acids
- metals
- cyanide

Overloading the system hydraulically reduces the effectiveness of pollutant removal. Also, a sudden shock will upset the biological balance and performance will drop. The shock can be either an increase in pollutants or an influx of unusual pollutants.

Refer to:

ARPEL Guideline #14, REFIN 37.0 Sewage Effluent and Wastewater Treatment

ARPEL Guideline #14, REFIN 38.0 Specific Effluent Monitoring Requirements

## 7.8 Sewage Treatment

#### Requirement

Sewage treatment systems must be designed and operated to ensure that effluents do not contaminate ground or surface water or soil and do not present a health hazard.

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Inspect sewage lagoons on site used to treat sewage/effluent.				
Sewage disposal/treatment facilities are designed, constructed and operated in accordance with applicable legislation.				
The following criteria are recommended:				

а	Maximum flow will be dependent on			
	the dimensions of the lagoon.			
b	Retention time should be sufficient to			
	allow for decomposition.			
С	Sewage decomposition should be			
	monitored.			
d	Must have sufficient freeboard to			
	prevent overflow in case of heavy			
	rainfall.			
е	Must be fenced.			
f	Vegetation control on berms.			
g	Surface runoff to be diverted around			
	the lagoon.			
h	Release limits according to existing			
	regulations.			
į :	Berms must be minimum 1V:3H.			
J	Berms must be sufficiently wide at top			
L	to allow for equipment and personnel.			
k	Bottom of lagoon must be level and			
	flat.			
ı	A small pit in the bottom allows the			
m	large lagoon to be emptied.  Lagoon must be "relatively impervious"			
111	to control seepage (either compacted			
	clay or lined).			
Setha	ck distances: the lagoon must be at			
least:	ck distances. the lagoon must be at			
e loust.	300 m from any residence or assembly			
	occupancy outside the site or not			
	associated with the facility.			
	90 m from a residence or assembly			
	occupancy on the site.			
•	30 m from the property line.			
•	30 m from any residence.			
•	all measurements are taken from the			
•	outside berm where the side			
_	slope of the berm intersects with the			
•	natural grade.			
Varify	that lagoon is properly built, effluent is			
	leased before full retention time and			
	are no leaks.			
	ct location of site for suitability of			
lagooi				
Guida		l		-
	to: ARPEL Guideline #14, REFIN 43.0 S	ewage Lagoons		
	to. That LE Caldonno # 11, INC. IN TO.U O	chago Lagoons		

# 8.0 WASTE MANAGEMENT

# 8.1 Hazardous Waste

Requirement			
The disposal of waste materials	shall be in compliance with a	pplicable legislation. Verify that	t wastes are disposed

Verify that a documented Waste Management Plan is in place, and that it includes the following components:  a A description of relevant policies and legislation b Formalized waste management procedures are in place, including relexifiences possibilities, work instructions, training requirements, reporting requirements, and monitoring/auditing requirements, and monitoring/auditing requirements.  c One individual has been assigned the position of supervisor of the waste management program d Waste characterization methods e Monitoring/auditing plan f Waste tracking plan g Reporting requirements Wastes are managed by: a Minimizing the generation of wastes b Rendering hazardous wastes safe through destruction or treatment c Disposing in a secure manner when treatment is not feasible d Using technically-effective and cost-effective technologies Waste treatment and disposal choices have been made in consideration of: cost, local resources, legislation, and environmental impact. Information about the hazards and associated risks of hazardous wastes has been provided to employees, contractors, and other people on site. A comprehensive training program is in place for employees who handle waste. Employees are aware of the fire, health & safety and environmental aspects of wastes and can demonstrate waste management procedures. The highest priority in risk management has	of properly by assessing the components of a waste management program listed below.			•		
Verify that a documented Waste Management Plan is in place, and that it includes the following components:  a A description of relevant policies and legislation  b Formalized waste management procedures are in place, including roles/responsibilities, work instructions, training requirements, reporting requirements, and monitoring/auditing requirements, and monitoring/auditing requirements.  c One individual has been assigned the position of supervisor of the waste management program  d Waste characterization methods e Monitoring/auditing plan f Waste tracking plan g Reporting requirements Wastes are managed by: a Minimizing the generation of wastes b Rendering hazardous wastes safe through destruction or treatment c Disposing in a secure manner when treatment is not feasible d Using technically-effective and cost- effective technologies Waste treatment and disposal choices have been made in consideration of: cost, local resources, legislation, and environmental impact. Information about the hazards and associated risks of hazardous wastes has been provided to employees, contractors, and other people on site. A comprehensive training program is in place for employees who handle waste. Employees are aware of the fire, health & safety and environmental aspects of wastes and can demonstrate waste management procedures. The highest priority in risk management has	Specific Requirement	Finding Satisfactory Not Satisfactory No Information Not Applicable				
Plan is in place, and that it includes the following components:  a A description of relevant policies and legislation  b Formalized waste management procedures are in place, including roles/responsibilities, work instructions, training requirements, reporting requirements, and monitoring/auditing requirements.  c One individual has been assigned the position of supervisor of the waste management program  d Waste characterization methods  e Monitoring/auditing plan  f Waste tracking plan  g Reporting requirements  Wastes are managed by:  a Minimizing the generation of wastes  b Rendering hazardous wastes safe through destruction or treatment  c Disposing in a secure manner when treatment is not feasible  d Using technically-effective and costeffective technologies  Waste treatment and disposal choices have been made in consideration of: cost, local resources, legislation, and environmental impact.  Information about the hazards and associated risks of hazardous wastes has been provided to employees, contractors, and other people on site.  A comprehensive training program is in place for employees who handle waste. Employees are aware of the fire, health & safety and environmental aspects of wastes and can demonstrate waste management procedures.  The highest priority in risk management has	Vorify that a documented Wasta Management	Salistactory	NOT Satisfactory	ino iniormation	NOT Applicable	
following components:  a A description of relevant policies and legislation  b Formalized waste management procedures are in place, including roles/responsibilities, work instructions, training requirements, exporting requirements, and monitoring/auditing requirements.  c One individual has been assigned the position of supervisor of the waste management program  d Waste characterization methods  e Monitoring/auditing plan  f Waste tracking plan  g Reporting requirements  Wastes are managed by:  a Minimizing the generation of wastes  b Rendering hazardous wastes safe through destruction or treatment  c Disposing in a secure manner when treatment is not feasible  d Using technically-effective and costefictive technologies  Waste treatment and disposal choices have been made in consideration of: cost, local resources, legislation, and environmental impact.  Information about the hazards and associated risks of hazardous wastes has been provided to employees, contractors, and other people on site.  A comprehensive training program is in place for employees who handle waste. Employees are aware of the fire, health & safety and environmental aspects of wastes and can demonstrate waste management procedures.  The highest priority in risk management has						
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	been given to those sources which pose known					
serious risks to the environment and/or human						
health.						
Realistic waste reduction/minimization targets						
are in place.						

Cofe account above to allition and in place for		1
Safe, secure storage facilities are in place for		
on-site storage of wastes.		
Necessary permits are in place for storage		
facilities.		
Storage facilities are accessible for fire fighting		
and other emergency procedures.		
Storage facilities will not be flooded by the 24		
hour 10 year storm.		
Construction of storage facilities conforms with		
applicable building, fire, and equipment design		
codes.		
Access to storage facilities is limited to		
authorized personnel.		
Storage facilities are signed to indicate the		
hazards within.		
Incompatible wastes are not stored together.		
Aqueous and non-aqueous wastes are		
segregated.		
Storage facilities containing drums have an		
o o		
impervious, non-reactive floor, a surb around		
the perimeter of the floor (with no gaps), no floor		
drains connected to a sewer, and appropriate		
side walls and roof for weather protection.		
Waste loading/unloading areas are designed		
and constructed to contain spills.		
Overpack drums are used where appropriate to		
contain leaking drums.		
Waste containers are kept closed except when		
waste is being added or removed.		
Waste containers used are appropriate for the		
wastes they contain.		
Every waste container is labeled, stating the		
identity of the waste.		
Any materials spilled are contained and cleaned		
up.		
Emergency response procedures for the facility		
address potential incidents associated with		
waste management		
An accurate and up-to-date inventory of wastes		
is maintained.		
All wastes leaving the plant are documented		
and manifested in accordance with regulatory		
requirements (including information on waste		
type, quantity, source, destination, carrier,		
employee responsible)		
All waste streams have been		
classified/characterized (including periodic re-		
testing). Where necessary, independent		
laboratories have been used.		
A waste tracking system is in place, including		
manifesting of all wastes shipped off site		
A waste auditing program is in place, including		
records of past audits		

A waste reporting system is in place, including			
monthly, quarterly and annual reports. The			
reports include data on waste type, disposition,			
volumes, and cost of treatment/disposal.			
The following materials are not landfilled:			
Free liquids and materials containing free liquide			
liquids			
<ul> <li>Empty containers, unless crushed/shredded to reduce volume</li> </ul>			
Flammable solids, spontaneously			
combustible materials, water reactive			
materials, oxidizers and organic			
peroxides			
<ul> <li>Acid wastes, cyanides, halogenated</li> </ul>			
organic compounds			
<ul> <li>Materials containing PCB compounds in</li> </ul>			
concentrations above 50 ppm			
Wastes are not sprayed onto road surfaces as a			
means of dust control			
Sludges are not dewatered via outdoor			
evaporation.			
Waste catalysts are not mixed.			
Wastes are shipped only by carriers licensed to			
handle those wastes.			
Filters are drained for at least three days prior to			
disposal, and the drained liquids are captured			
for appropriate disposal.  Wastes are shipped only to facilities licensed to			
handle, treat, or store those wastes.			
Waste storage capacity is adequate to handle			
facility turnarounds and upset conditions.			
Wastes are not diluted for the sole purpose of			
meeting regulatory release guidelines.			
Laboratory wastes are disposed of properly.			
Waste disposal is carried out such that it does			
not attract wildlife.			
When handling waste, procedures are followed			
and personal protective equipment is worn.			
Specific waste streams are disposed of in			
accordance with preferred methods listed below			
Guidance			
Source/Waste	Preferred Disposal Method		
Tank bottoms - Leaded gasoline	Weathering of sludge, followed by secure landfill; chemical		
Lame Sollomo Loudou gusonno	fixation		
Tank bottoms - Unleaded gasoline	Landfarming; chemical fixation, secure landfill; incineration		
Tank bottoms - Crude Oil	Oil recovery on site or off site; landfarming; incineration; secure		
	landfill; chemical		
	fixation		
Tank bottoms – distillates	Landfarming; secure landfill; chemical fixation		
Tank bottoms - Decant Oil	Landfarming; incineration; secure landfill		
Tank bottoms - bunker	Recycling; reclaiming; landfarming; secure landfill; incineration		

Guidance	
Source/Waste	Preferred Disposal Method
Tank bottoms - Slop oil	Reclaiming of oil; recycling of Fluid Catalytic Cracking Unit;
'	landfarming; incineration
Asphalt waste	Recycle; reuse; incineration
Desalter clean out sludges	Landfarming; oil recovery;
3	secure landfill
Caustic solution	Reclamation to a chemical plant; disposal wells; desalter pH
	adjustment; neutralization with acid or flue gas before injection
	to wastewater treatment; controlled injection to wastewater
	treatment plant as dictated by effluent limits
HF acid (Neutralized)	Chemical fixation; secure landfill; wastewater treatment
H <sub>2</sub> SO <sub>4</sub> acid (spent)	Reclaiming; neutralization and chemical fixation
Clay (spent)	Sanitary landfill; landfarming; incineration before sanitary
	landfilling.
Activated carbon (spent)	Recycling to supplier or sanitary landfill.
Amine filters	Sanitary landfill, landfarming
Off specification sulfur	Sanitary or secure landfill; recycling or reuse; incineration
Furfural (spent)	Incineration
Glycol (spent)	Incineration; chemical fixation, wastewater treatment system (with a biotreater)
Coke fines	
Coke illies	Sanitary or secure landfill depending on heavy metals content; reuse as a fuel off site; chemical fixation
Stratford colution	
Stretford solution	Wastewater treatment system.
FCUU (Fluid Catalytic Cracking Unit)	Recycle; sanitary landfill catalyst (spent) chemical fixation; reuse as feed to cement kiln
FCUU dust	Recycle; sanitary landfill (wetted down); chemical fixation;
1 000 dd3t	reuse as feed to cement kiln
Poly unit catalyst (spent)	Secure landfill; landfarming; chemical fixation; nutrient for
r ory arm sataryst (sportly	wastewater treatment plant
H2 plant catalyst (spent)	Reclaiming of metals; chemical fixation; secure landfill
Reformer catalyst (spent)	Reclaiming by supplier
Hydrocracker catalyst (spent)	Chemical fixation; reclaiming; secure landfill
Hydrotreater catalyst (spent)	Reclaiming; chemical fixation; secure landfill
Merox catalyst (spent)	Reclamation to a chemical plant; disposal wells; desalter pH
	adjustment; neutralization with acid or flue gas before injection
	to wastewater treatment
Copper chloride catalyst (spent)	Secure landfill
Claus plant catalyst (spent)	Sanitary landfill
HF Acid soluble polymer	Retrofit process and eliminate at source; lime neutralization and
	incineration; wastewater treatment system
Cooling tower sludge	Chemical fixation; chromate recovery; secure landfill
Lime sludge	Reuse in cement plant; sanitary landfill; landfarming
Anthracite filters	Sanitary landfill; incineration
Spent zeolite resins	Sanitary or secure landfill
Sand from filters	Landfarming; secure landfill; sanitary landfill
Ion exchange regenerant	Wastewater treatment
Gravity separator sludge	Landfarming; recycle to Coking Unit; approved industrial
	incineration; secure landfill
Biotreater sludge	Incineration; chemical fixation; landfarming; sanitary landfill
Storm pond silt	Chemical fixation; landfarming; landfilling
Sump sludge	Landfarming; recycle to Coking Unit; approved industrial
	incineration; secure landfill

Guidance	
Source/Waste	Preferred Disposal Method
Refractory brick	Secure landfill or sanitary landfill
Oil-contaminated soil	Landfarming; secure landfill
Used drums	Send drums to reclaimer; rinse, crush and sell for scrap;
	storage/dry shelter
PCB wastes	Secure indoor storage; secure outdoor storage; send to PCB
	destruction facility capable of 99.9999% destruction efficiency
Asbestos waste	Waste is double-bagged and labeled prior to landfilling
Demolition scrap	Sanitary landfill; reclaiming
Heat exchanger cleanings (solids)	Secure landfill; chemical fixation
Heat exchanger cleanings (liquids)	Secure landfill; chemical fixation
	Wastewater treatment after neutralization; chemical fixation;
	disposal wells; incineration of organics
Spent chemicals (liquid)	Aqueous: to an enclosed vented settling tank with liquid effluent
	to wastewater treatment system
	Non-aqueous, non-hazardous: to an enclosed and vented
	holding tank for pump out and reprocessing
	Hazardous chemicals: to a segregated vented holding tank for
	suitable treatment depending upon chemical composition
Spent chemicals (solid)	Secure landfill

#### Refer to:

Guidelines for the Management of Petroleum Refinery Liquid Wastes, ARPEL Guideline #27.

Guidelines for the Management of Refinery Solid Wastes, ARPEL Guideline #3.

Integrated Management of Wastes in Downstream Facilities, ARPEL Guideline #37.

ARPEL Guideline #14, REFIN 36.0 Exposure to Toxic Substances

ARPEL Guideline #14, REFIN 35.0 Disposal of Refinery Wastes

ARPEL Guideline #14, REFIN 47.0 Filters

## 8.2 Non-Hazardous Waste

## Requirement

Non-hazardous solid wastes generated by operations shall be disposed of in an acceptable manner to prevent pollution to the environment.

Specific Requirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Site and rights-of-way are kept free of debris					
Non-hazardous waste is placed in metal or					
plastic containers and disposed of off-site					
Non-hazardous materials suitable for					
recycling should be stored separately and					
recycled accordingly.					
If incineration is an acceptable disposal					
practice, verify method of disposal of waste					
material not consumed by burning. Verify that					
the types and volumes of wastes incinerated					

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 $\underline{\text{http://portal.arpel.org/apps\%5Carpel\%5Cml\_lib\_nueva2.nsf/0/BEE511352B90356C03257226006D3445?opendocument\&Fol\_derlD=1B99A2366F2B4AF303257213005F5671}$ 

and buried are recorded.		
Verify that the incinerator(s) is inspected and		
tested at least yearly to ensure optimum		
efficiency.		
Inspect garbage disposal sites. Garbage		
disposal sites should be used for small, non-		
toxic, non-perishable refuse and incinerator		
residues. Holes or pits should be located		
above the expected high water level. A		
minimum distance from the bank of a water		
body of 45 m is required. Consider and		
evaluate the potential of wildlife intrusions to		
the garbage disposal sites or attraction to the		
location		
Guidance	 	 
Refer to		

# 8.3 Hazardous Materials Management

ARPEL Guideline #14, REFIN 41.0 Disposal of General Solid Wastes

## 8.3.1 Asbestos

## Requirement

Measures must be taken to minimize exposure to asbestos-containing materials (ACMs) and to prevent any exposures above occupational exposure limits.

exposures above occupational exposure limits.	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
An Asbestos Management Plan is in place,	Satisfactory	Not Satisfactory	140 Information	Not Applicable	
and it contains the following elements:					
An up-to-date inventory of ACMs					
Identification of roles and responsibilities,					
including identification of one person					
responsible overall for asbestos management					
at the facility.					
Training and awareness procedures					
Notification procedures					
Removal and monitoring procedures					
Asbestos-containing materials are labeled,					
where practicable					
Asbestos-containing are disturbed only in					
compliance with documented procedures,					
including (where appropriate) monitoring					
Removal records are retained					
Asbestos-containing waste materials are held					
in restricted zones or transported immediately					
to their final disposal site.					
Employees who may be exposed to asbestos					
are aware of hazards and the appropriate					
procedures and have required PPE, including					
respiratory protection					
The inventory of ACMs is updated at least					
annually					

Refer to ARPEL Guideline #14, REFIN 42.0 Asbestos

# 8.3.2 Sulfur Handling (not applicable until after the refinery is expanded)

Requirement							
Proper handling, storage and transportation of sulfur is required.							
Specific Requirement		Find					
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable			
Verify that appropriate precautions are taken when handling sulfur							
Personnel should take measures to alleviate or mitigate the following major issues:							
a Potential human hazards.							
b Sulfur dust producing sulfuric acid when it reacts with water.							
c Sulfur spills when pouring molten sulfur into tank cars for transportation or onto sulfur blocks for storage.							
d Handling runoff and drainage from sulfur storage areas.							
e Reclamation of sulfur contaminated soils.							
Visible sulfur dust is not present near sulfur							
storage areas.  Guidance							
Refer to ARPEL Guideline #14, REFIN 49.0 Sulfur Handling							

#### 9.0 ABANDONMENT AND RECLAMATION

#### 9.1 **Abandonment and Reclamation Plan**

Requirement An abandonment and reclamation plan is in place					
Chaoifia Doguiroment	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
An abandonment and reclamation plan exists					
The reclamation plan will take into account					
whether it is part of a live site which is being					
reclaimed or whether the entire site is being					
abandoned.					
The plan should identify all capital salvage					
items, outline the salvage program, identify					
disposal options for items which cannot be					
reused, identify any contamination issues and					
how they are to be dealt with and specify the					
steps for the restoration of the site (or the					
portion being restored).					
The plan is based on site assessment					
information (Phase I, Phase II if necessary).					
The plan includes a cost estimate, inventory					
control, service contracts, equipment and					
material handling procedures, environmental					
protection measures, safety measures,					
schedule and priorities and cost control.					
The plan lists the details for the following					
procedures:					
site dismantling					
<ul> <li>removal of tanks</li> </ul>					
<ul> <li>decontamination</li> </ul>					
<ul> <li>soil remediation</li> </ul>					
<ul><li>recontouring</li></ul>					
<ul><li>revegetation</li></ul>					
<ul> <li>assessment of reclamation success</li> </ul>					
Guidance					

Refer to: ARPEL #14: REFIN 50.0 Reclamation Plan; ARPEL Guidelines for Decommissioning and Surface Land Reclamation at Petroleum Production and Refinery Facilities<sup>8</sup>

# 9.2 Site Dismantling

## Requirement

The physical removal of all buildings, facilities, structures and improvements – above and below ground - shall be done in an environmentally acceptable manner.

Specific Dequirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
A dismantling plan exists for the facility.					
Equipment and structures are removed					
appropriately.					
All liquids and sludges from					
vessels/tanks/lines are removed for					
Disposal before facility removal, and removal					
is documented.					
Power lines, power poles, gas lines,					
telephone lines, and equipment were					
removed by a utility company, and					
documented.					
Concrete pads and other inert materials are					
broken up and are buried on site with a					
minimum cover of 1 m of compacted fill or it					
can be hauled out.					
Gravel is salvaged as much as possible					
Flowlines are cut-off and capped a minimum					
of 1 m below grade.					
All improvements left in place and locations					
of buried material					
No contaminated material is buried or					
covered.					
Guidance		•	•		

Refer to: ARPEL #14: REFIN 51.0 Site Dismantling, REFIN 52.0 Tank Removal; ARPEL Guidelines for Decommissioning and Surface Land Reclamation at Petroleum Production and Refinery Facilities

## 9.3 Decontamination

Requirement						
Residual chemical contamination is remediated to appropriate guidelines.						
Specific Requirement		Find	ling			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable		
Historical spills have been remediated.						
Residual contamination from vessels,						
processes or tanks was identified, quantified,						
and remediated. Remediation was						
documented and reported.						
Waste management guidelines were used to						
manage decontamination operations.						
Local, or other, appropriate chemical criteria						
are used to assess levels of contamination.						
Guidance						

Refer to: ARPEL #14: REFIN 53.0 Decontamination; ARPEL Guidelines for Decommissioning and Surface Land Reclamation at Petroleum Production and Refinery Facilities

## 9.4 Reclamation

# Requirement

Once facilities are decommissioned and contamination is remediated, an abandoned site will be reclaimed to meet the needs of future land use.

Specific Requirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
A reclamation plan is in place for the facility.					
The reclamation plan accounts for soil					
decontamination, soil replacement,					
recontouring, and revegetation.					
The reclamation plan identifies indicators of					
successful reclamation, a proposed timeline,					
and monitoring plan.					
Stakeholders have been consulted about					
future land use for the site, and issues and					
concerns have been documented and					
followed up.					
The reclamation plan is suitable to the					
proposed future land use.					
Monitoring reclamation success is carried out					
on a regular basis, results are recorded and					
reported.					
Cuidanca					

Guidance

Refer to: ARPEL #14: REFIN 54.0 Soil Reclamation, REFIN 55.0 Recontouring, REFIN 56.0 Revegetation, REFIN 57.0 Reclamation Assessment; ARPEL Guidelines for Decommissioning and Surface Land Reclamation at Petroleum Production and Refinery Facilities

# APPENDIX D - SERVICE STATIONS AND STORAGE OPERATIONS PROTOCOL

This appendix contains audit checklists that were prepared to be used for audits of PCJ's storage and service stations operations. However, this checklist can be used by other oil and gas companies although they should be adapted to their specific –local- regulatory framework and/or corporate procedures.

Checklist for Conducting Environmental Audits: Storage and Service Stations Operations

The user is encouraged to have at hand the ARPEL Guideline #14 "Guidelines for Conducting Environmental Audits for the Petroleum Industry Operations" (1997), found at <a href="http://portal.arpel.org/apps%5Carpel%5Cml">http://portal.arpel.org/apps%5Carpel%5Cml</a> lib nueva2.nsf/0/0EF86569B866C51003257226006D3465?opendoc <a href="mailto:ument&FolderID=4456269EDB93459803257213005F63F0">ument&FolderID=4456269EDB93459803257213005F63F0</a>

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## 1.0 MANAGEMENT

## 1.1 Approvals

#### Requirement

No person shall construct or cause to construct, install, alter, or operate a service station facility unless all required permits and approvals have been obtained from the authority having jurisdiction.

Specific Requirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Required permits, licenses and regulatory authorizations for the service station facility are in place and are available on site.					
Plans, drawings and specifications of the system or equipment have been examined by the authority having jurisdiction.					

#### Guidance

Refer to: International Fire Code, Version 1.0 (2006), section 105.6.

Check office and site records for permits and regulatory authorizations.

Check design documents, such as As-Built drawings, for inclusion of any specific environmental management structures.

Check that permits and licenses are available on site.

Check for documentation and reports that address limitations or conditions required by the permits, such as:

- Annual monitoring programs for soil and water
- Surface water management and release reports
- Spill reports

Interview management regarding specific permit requirements, the documentation, training and reporting of these permit requirements.

## 1.2 Site Security

ss to ensure prod	duct integrity.			
	Find	ing		
Satisfactory Not Satisfactory No Information				
Any fences are in good condition.  Guidance				
	·		Finding	

Refer to: ARPEL Guideline #14 reference: REFIN 18.0 Access Control

International Fire Code, Version 1.0 (2006), Section 2206.3

## 1.3 Training

## Requirement

Service station operating personnel are trained and aware of the environmental impacts of their operations. Personnel understand the necessity for environmental planning and protection measures.

Specific Requirement		Find	ing	
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Personnel have taken environmental training				
in their field of operations and are clear on				
how to implement and use their training				
correctly.				
Persons responsible for the operation of				
areas in which hazardous materials are				
stored, dispensed, handled or used are				
familiar with the chemical nature of the				
materials and the appropriate mitigating				
actions necessary in the event of fire, leak or				
spill.				
Personnel update their training yearly, or as				
required by law.				
Environmental training manuals and				
reference programs are available.				
Operators have been trained in				
transportation safety and environmental				
protection.				
An employee involved with the transfer of				
petroleum products is trained in the correct				
operating procedures for all equipment and				
shut-down devices.				
Employees receive training in the contents of				
fire safety, spill response and evacuation				
plans and their duties as part of new				
employee orientation and at least annually				
thereafter.				
Training records are up-to-date.				

#### Guidance

Refer to: ARPEL Guideline #14 Reference: REFIN 2.0 Personnel Training
International Fire Code, Version 1.0 (2006), Chapter 4 (Emergency Planning and Preparedness), Chapter 22 (Motor Fuel-Dispensing Facilities and Repair Garages)

Check that training guidelines for each job exist.

Check training records for personnel and ensure they are up to date.

Confirm that personnel are trained for the environmental requirements of their job and as per the guidelines. For example:

- emergency response/spill containment training,
- volume monitoring,
- supervision of truck unloading,
- · transportation of dangerous goods guidelines,
- current regulatory requirements and best operating procedures.

Identify the system by which personnel are reminded to update training – are records available?

Check the reference library for manuals and guidelines.

Check each department for appropriate training manuals.

Interview managers and personnel regarding training schedules and funding.

# 1.4 Records

Requirement A comprehensive records management system	is in place.			
Specific Requirement		Find	ing	
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Version control is in place for procedures,				
manuals, guidelines, etc.				
Up to date engineering drawings are on file,				
including as-built drawings				
Records of tank installation and removal are				
available.				
Records of site inspections are available.				
Records are available of maintenance or				
repair performed in response to site				
inspections.				
Required test and inspection records are				
available to fire code officials at all times.				
Records are available covering:				
(a) inventory control and reconciliation				
(b) inspections and maintenance				
(c) cathodic protection monitoring				
(d) precision leak detection tests				
(f) maintenance and repairs;				
(g) monitoring well results;				
(h) construction, alterations, or upgrades;				
and,				
(i) as-built drawings.				
Guidance				
International Fire Code, Version 1.0 (2006), Sec	ction 107 (Admin	istration) and Chap	oter 22 (Motor Fue	el-Dispensing
Facilities and Repair Garages)				

# 2.0 SPILL PREVENTION AND LEAK DETECTION

# 2.1 General Spill Prevention and Housekeeping

Requirement All sites shall be maintained properly and kept n	eat, clean and s	afe.			
Considia Damainamant		Find	ing		
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Site is kept neat, tidy and free from litter and					
waste.					
Weeds, grass, brush and other combustible					
materials are controlled within 3 m of fuel-					
handling equipment.					
General housekeeping is focused on					
reducing drips, spills, overflow or other loss.					
Areas where flammable or combustible					
liquids are dispensed are designed to					
accommodate accidental spillage.					
A reporting and documentation process exists					
in case of spills or leaking from tanks.					
Lighting is sufficient for operating procedures.					
Facilities and operations have equipment and					
procedures in place to prevent spillage or					
reduce impacts to the environment as a result					
of a spill.					
No container is filled with product at a facility					
unless the container is approved, in safe					
condition, and is not filled beyond its nominal					
capacity.					
A portable container is not filled while the					
container is in a vehicle, inside a trunk, or on					
the truck bed of a vehicle.					
Liquids spilled during dispensing operations are prevented from flowing into buildings by					
such means as grading and doorsills.					
The dispensing of fuel is conducted by, or					
under the supervision of, a qualified					
attendant.					
A hose nozzle is manually held open during					
transfer operations (hold-open devices are					
not used).					
The attendant gives immediate attention to					
accidental spills.					
Where possible, an automatic leak detection					
device, including a high-technology					
secondary containment monitoring device					
and precision line leak detection device, will					
be electrically interlocked in such a manner					
that:					
(a) when the automatic leak detection device					
is activated, product flow is shut off; and					
(b) except for on-site maintenance activities,					
when the automatic leak detection device is					
turned off or bypassed for more than one					

minute, product flow is terminated.		
A leak detection alarm is located where the		
staff routinely work and in a place where such		
alarms can be readily heard and seen.		
Guidance		

Refer to: ARPEL Guideline #14 REFIN 20.0 Housekeeping

International Fire Code, Version 1.0 (2006), Section 107 (Administration) and Chapter 22 (Motor Fuel-Dispensing Facilities and Repair Garages)

Housekeeping refers to the general maintenance of a site with respect to acceptable operating practices, upkeep maintenance and overall orderliness of the grounds, buildings and equipment.

## 2.2 Inspection, Testing and Preventive Maintenance of Storage Tank Systems

## Requirement Routine in-service inspections and maintenance are conducted. Underground storage tank systems are tested for leaks. **Finding** Specific Requirement Not Satisfactory No Information Not Applicable Satisfactory Regular visual inspections are completed to detect any visible leak or deterioration that may lead to a leak. Regular inspections occur either: (a) each day the facility is in operation; or (b) at a frequency specified by the authority having jurisdiction. A documented weekly visual inspection is done of the storage tank facility to ensure that there has not been a leak or equipment failure for: (a) pumps and product-handling equipment; (b) tank gauging equipment; (c) mechanical and automatic electronic leak detection equipment; (d) dispenser sumps and spill containment devices: and (e) overfill protection devices. Inspection and performance testing is completed at least annually, or in conformance with the manufacturer's requirements and procedures, to ensure satisfactory equipment performance and operation of a storage tank facility is conducted annually and documented by a company or individual that is authorized by the authority having jurisdiction for: (a) automatic tank gauges and monitoring systems; (b) electronic or mechanical leak detection equipment; (c) corrosion protection equipment; (d) pressurized piping emergency valves; (e) emergency shut-down devices;

(f) containment sumps including dispenser, turbine and transition containment devices; and		
(h) overfill protection devices.		
The underground storage tank system is		
tested for leaks:		
<ul> <li>at the time of final installation (when final surface materials have been installed) and prior to being put into service; or</li> </ul>		
<ul> <li>whenever a leak is suspected in the primary or secondary containment of the storage tanks, piping, containment sumps or related components.</li> </ul>		

## Refer to:

International Fire Code, Version 1.0 (2006), Chapter 22 (Motor Fuel-Dispensing Facilities and Repair Garages)

ARPEL Guideline # 14 REFIN 11.0 Tank Operations

ARPEL Guideline #8, 2nd Edition, Guideline for Control of Contamination from Underground Storage Tanks

Suitable testing of underground storage tanks includes: internal inspection, hydrostatic leak tests, pneumatic leak tests, soil vapor and groundwater monitoring, or another method that provides the same level of confidence.

Inspect any logbooks, records or incident reports.

# 2.3 Inventory Control

Requirement				
The owner of a storage tank system conducts in	nventory control a	and reconciliation.		
Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Accurate daily inventory records shall be				
maintained and reconciled on underground				
fuel storage tanks for indication of possible				
leakage from tanks and piping.				
The records are be kept at the premises or				
made available for inspection by the authority				
having jurisdiction within 24 hours of a written				
or verbal request and include records for				
each product showing daily reconciliation				
between sales, use, receipts and inventory				
on hand.				
Where there is more than one system				
consisting of tanks serving separate pumps				
or dispensers for a product, the reconciliation				
is ascertained separately for each tank				
system.				
A consistent or accidental loss of product is				
immediately reported to the fire code official.				

Refer to:

International Fire Code, Version 1.0 (2006), Section 107 (Administration) and Chapter 22 (Motor Fuel-Dispensing Facilities and Repair Garages)

ARPEL Guideline # 14 REFIN 11.0 Tank Operations

ARPEL Guideline #8, 2nd Edition, Guideline for Control of Contamination from Underground Storage Tanks

Suitable testing of underground storage tanks includes: internal inspection, hydrostatic leak tests, pneumatic leak tests, soil vapor and groundwater monitoring, or another method that provides the same level of confidence.

Inspect any logbooks, records or incident reports.

## 2.4 Product Delivery

#### Requirement

A person responsible for transferring petroleum product to a storage tank system must take all reasonable steps to prevent spills.

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
The driver, operator, or attendant of a tank vehicle determines the available capacity of the tank using an approved gauging device.				
When a tank vehicle is being unloaded, the vehicle operator remains: (a) in constant view of the fill pipe; and (b) in constant attendance at the delivery control valve.				
No person transfers petroleum product to an underground storage tank unless a liquidand vapor tight fill connection is made to the underground storage tank.				

## Guidance

Refer to:

International Fire Code, Version 1.0 (2006), Chapter 22 (Motor Fuel-Dispensing Facilities and Repair Garages)

ARPEL Guideline #14: REFIN 10.0 Bulk Product Receipt and Delivery

- Determine hours trucks should be operating.
- Through interviews, determine driver training effectiveness including training in transportation of dangerous goods, spill response, etc.
- Inspect the loading areas to assess general housekeeping, control and cleanup of leaks and assess transfer operations which are in progress.

# 2.5 Signs and Labels

# Requirement

Signs and labels are required at the facility to provide information on procedures to prevent environmental damage.

Specific Requirement	Finding			
<u> </u>	Satisfactory	Not Satisfactory	No Information	Not Applicable
Warning signs are conspicuously posted within sight of each dispenser in the fuel-dispensing area stating the following:  1. No smoking.  2. Shut off motor.  3. Discharge your static electricity before fueling by touching a metal surface away from the nozzle.  4. To prevent static charge, do not reenter your vehicle while gasoline is pumping.  5. If a fire starts, do not remove nozzle—back away immediately.  6. It is unlawful and dangerous to dispense gasoline into unapproved containers.  7. No filling of portable containers in or on a motor vehicle. Place container on ground	Suisiación	THOSE SALISHED TO		Troit Application
before filling.  An emergency procedures sign, in addition to the signs is posted in a conspicuous location and reads: IN CASE OF FIRE, SPILL OR RELEASE 1. USE EMERGENCY PUMP SHUTOFF 2. REPORT THE ACCIDENT! FIRE DEPARTMENT TELEPHONE NO FACILITY ADDRESS  Emergency disconnect switches are distinctly				
labeled as 'EMERGENCY FUEL SHUTOFF'				
Dispenser operating instructions are conspicuously posted on every dispenser.  Guidance				

Guidance

Refer to: ARPEL Guideline # 14 reference: REFIN 12.0 Distribution Lines

International Fire Code, Version 1.0 (2006), Chapter 22 (Motor Fuel-Dispensing Facilities and Repair Garages)

# 3.0 EMERGENCY PREPAREDNESS AND SPILL RESPONSE

# Requirement

An Emergency Response Plan exists to protect the public, employees, the environment and property should an emergency occur. A comprehensive spill response plan is in place to limit impact to the environment.

Specific Requirement	Finding			
·	Satisfactory	Not Satisfactory	No Information	Not Applicable
An appropriate up-to-date emergency				
response/spill plan exists and is posted on-				
site.				
Personnel are familiar with the plan and their				
roles and responsibilities in spill response.				
Spill response training includes information				
on disposal of materials used to manage and				
contain the spilled material.				
Spill response kits are complete and easily				
accessible.				
Spill records are maintained, including				
location, volume, released chemical,				
response provided, recovery actions and any				
follow up.				
All material and equipment specified in the				
Emergency Response Plan is available on				
site.				
An emergency contact list is available on site.				
The owner or operator of a storage tank				
system immediately notifies the authority				
having jurisdiction and provides the				
information requested when the owner or				
operator discovers, suspects, or is notified by				
any person of:				
(a) any leak from a storage tank system;				
(b) any spill or overfill that is 100 L or more;				
or				
(c) any spill or overfill that could threaten				
fresh water supplies, groundwater, or the				
health and safety of the public.				
The owner of a storage tank system where a				
leak or spill is known or suspected does, in				
consultation with the authority having				
jurisdiction, take such actions as the authority				
having jurisdiction requires to verify, stop,				
clean up, and mitigate the impact of the leak				
or spill, including but not				
limited to:				
(a) isolating leaking components of the				
storage tank system;				
(b) arranging for immediate removal of the				
petroleum product from the isolated leaking				
components of				
the storage tank system;				
(c) inspecting the storage tank or piping and:				
(i) arranging for a leak test; or				

(ii) removing the suspected leaking			
storage tank or piping;			
(d) taking all reasonable steps to establish			
the extent of the contamination (including			
vapors), contain the leaked or spilled			
petroleum product, and prevent its further			
migration; and			
(e) taking all reasonable steps to recover or			
remove escaped petroleum product.			
A readily-accessible emergency disconnect			
switch is provided to stop the transfer of fuel			
to the fuel dispensers in the event of a fuel			
spill or other emergency. The switch is			
located more than 6 m and less than 30 m			
from the fuel dispensers.			
0 ' 1	ı		ı

Refer to: ARPEL Guideline # 14 REFIN 13.0 Product Storage; REFIN 33.0 Spill/Release Contingency Plans; REFIN 22.0 Release of Hydrocarbons; REFIN 32.0 Release/Spill Prevention,

International Fire Code (2006), Chapter 4 (Emergency Planning and Preparedness)

The contents of the spill emergency response contingency plan include the following information:

- a The procedures for handling and investigating spill or leakage reports.
- b The procedure for alerting company personnel and affected outside parties.
- c A clear definition of the responsibilities of everyone involved.
- d Guidelines for reaction and control, including shut-down procedures, leak locations, leak isolation, spillage/release containment, watercourse protection, etc.
- e Guidelines for the protection of operating personnel and the general public...
- f A telephone contacts summary.

Review any past incident reports. The review should include an assessment of the contingency plan and the response as well, assessing whether there should be any improvements made to the plan or the training provided.

Spill records include the location and size of any spills, the environmental receptor (soil, surface water, marine water, etc.), measures taken to control and remediate the spill, and any volume recovered.

## 4.0 STORAGE TANKS

# 4.1 Aboveground Storage Tanks (ASTs)

# Requirement

Operation of aboveground tanks shall be carried out in a manner that does not cause damage to the environment. Tank operations include all work which is done in conjunction with tanks. Examples are gauging, loading and unloading of tanks and emergency containment.

Specific Deguirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
A shop-fabricated aboveground storage tank				
system:				
<ul> <li>has corrosion protection</li> </ul>				
<ul> <li>has a secondary containment</li> </ul>				
system				
- has leak detection				
- has containment sumps, as				
applicable				
- where a high-level alarm system is				
used, have audible and visual				
alarms located where personnel are constantly on duty during the				
product transfer operation and can				
promptly stop or divert delivery to				
the tank				
A horizontal storage tank is supported above				
grade level.				
Storage areas are clearly marked with signs				
and labeling on tanks.				
Aboveground tanks must be located within				
an impervious containment system				
sufficiently large to accommodate 100% of				
the largest tank volume. The capacity of the				
diked area must be calculated by deducting				
the volume of the tanks other than the largest				
tank (below the height of the dike).				
If any produced liquids enter the diked area,				
they must be collected and disposed of in an				
acceptable manner.  Containment systems are maintained and				
monitored for leaks on a regular basis.				
Results of leak monitoring are documented				
and reported.				
Tanks are painted with a protective coating to				
prevent corrosion or rusting				
Periodic inspections of tanks, leak detection				
systems and dikes are conducted and results				
are recorded.				
Aboveground tanks are protected against				
impact from a motor vehicle.				
Where a tank is located in an area subject to				
buoyancy because of flooding, uplift				
protection is provided.				

Aboveground tanks are not filled in excess of 95% of their capacity.		
Operators are trained to incorporate		
measures to prevent the overfilling of tanks.		
These may include automatic shut-off		
devices, alarms or visual indicators.		
Guidance		

Refer to: ARPEL Guideline # 14 REFIN 11.0 Tank Operations; ARPEL Guideline #18, Guideline for Control of Contamination from Aboveground Storage Tanks

International Fire Code (2006), Chapter 34 (Flammable and Combustible Liquids)

A leak detection system can include:

- a A synthetic liner with a monitoring well.
- b Annual interstitial monitoring of double walled tanks.
- c Annual visual detection of vaulted tanks.
- d Monthly monitoring of weeping tile systems if the soil is of low permeability.

Special testing programs for tanks may include: 100% external inspection, internal inspection, hydrostatic leak tests, soil vapor and ground water monitoring or another method that provides the same level of confidence.

#### 4.2 Underground Storage Tanks (USTs)

#### 4.2.1 Design and Installation

Requirement

Design and installation of an underground stora instructions and the appropriate standards.	ige tank system	is in accordance w	ith the manufact	urer's	
	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
An underground storage tank system is					
designed and installed to have:					
<ul> <li>double-wall tank(s) with monitorable</li> </ul>					
interstitial space;					
<ul> <li>an overfill protection device;</li> </ul>					
<ul> <li>a fill pipe spill containment device;</li> </ul>					
<ul> <li>containment sumps, as applicable;</li> </ul>					
<ul> <li>leak detection</li> </ul>					
<ul> <li>except for venting purposes, liquid</li> </ul>					
and vapor-tight connections, caps					
and adapters; and					
<ul> <li>corrosion protection, where</li> </ul>					
applicable.					
A spill container having a capacity of not less					
than 19 L is provided for each fill connection.					
Installation of an underground storage tank					
system is completed by a company or					
individual that is authorized by the authority					
having jurisdiction.					
Where a tank is located in an area subject to					
buoyancy because of a ride in the water					
table, uplift protection is provided.					

An underground storage tank is located and maintained to permit the eventual removal of the storage tank when the storage tank system is taken out-of-service.		
As-built drawings for an underground		
storage tank system include, as a minimum:		
(a) the outline of all storage tanks;		
(c) the centerline of all piping or piping		
groups;		
(c) the centerline of all underground		
electrical power and monitor sensor		
conduit; (d) building foundation outlines;		
(e) secondary containment systems; and		
(f) property lines.		
Cuidones		

#### Guidance

Refer to:

International Fire Code, Version 1.0 (2006), Chapter 34 (Flammable and Combustible Liquids)

ARPEL Guideline # 14 REFIN 11.0 Tank Operations

ARPEL Guideline #8, 2nd Edition, Guideline for Control of Contamination from Underground Storage Tanks

#### 4.2.2 Piping Systems

#### Requirement

Piping systems associated with storage tanks will be designed, installed, maintained and monitored to prevent impact to the environment.

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Where subject to external corrosion, piping,				
related fluid-handling components and				
supports for both underground and above-				
ground applications are fabricated from non-				
corrosive materials, and coated or provided				
with corrosion protection.				
Flexible joints are be installed on				
underground liquid, vapor and vent piping at				
all of the following locations:				
Where piping connects to underground tanks.				
2. Where piping ends at pump islands and				
vent risers.				
3. At points where differential movement in				
the piping can occur.				
and piping dam doddin				
Fibreglass- reinforced plastic (FRP) piping is				
not required to be provided with flexible joints				
in locations where both of the following				
conditions are present:				
1. Piping does not exceed 100 mm in				

diameter.				
2. Piping has a straight run of not less than				
1.2 m on one side of the connection when				
such connections result in a change of				
direction.				
Leak detection testing and monitoring of				
piping is carried out and reported.				
Piping located below the maximum product				
level in a tank is provided with a means to				
prevent the release of liquid from the tank by				
siphon flow.				
Piping is located and maintained to permit				
the eventual removal of the piping when the				
storage tank system is permanently				
withdrawn from service.				
Piping located aboveground is protected from				
physical damage due to impact.				
Guidance				
Refer to:				
International Fire Code, Version 1.0 (2006), Ch	apter 34 (Flamma	able and Combust	tible Liquids)	

## 5.0 FUEL DISPENSING STATIONS

# Requirement Fuel dispensing stations are designed, operated, maintained and monitored to ensure protection of the environment.

Specific Requirement	Finding			
·	Satisfactory	Not Satisfactory	No Information	Not Applicable
Dispensing equipment at a facility is installed				
on a pump island or support structure				
protected from vehicular impact.				
Dispenser hoses shall be a maximum of 5 m				
in length unless otherwise approved.				
When not in use, hoses shall be reeled,				
racked or otherwise protected from damage				
Where remote pumps are used to supply fuel				
dispensers, each pump has a leak detection				
device that will detect a leak in the piping and				
dispensers and provide an indication. A leak				
detection device is not required if the piping				
from the pump discharge to under the				
dispenser is above ground and visible.				
Only approved equipment is used to				
dispense product at a facility.				
Every portable container at a facility which				
contains product, is kept tightly closed when				
not in use and the contents of the container				
are legibly marked on the container.				
Combustible materials are stored for sale at				
least 3 m from the pumps or dispensers at a				
facility.				
Product is not dispensed or vented at a				
facility within 3 m of any source of ignition.				
Product is not dispensed into the fuel tank of				
a motor vehicle while the engine of the motor				
vehicle is running.				
Smoking is not permitted in a kiosk that is				
less than 3 m from any dispensing location.				
Absorbent material is provided for use by				
attendants at fuel dispensing stations to soak				
up liquid spillage.				
The attendant is able to communicate with				
persons in the dispensing area at all times.				
All packaged flammable and combustible				
liquid products stored or sold at a fuel				
dispensing station are in closed containers				
and distinctly marked with the generic name				
of the liquid they contain.				
Guidance				
Defer to:				

Refer to:

International Fire Code, Version 1.0 (2006), Chapter 22 (Motor Fuel-Dispensing Facilities and Repair Garages)

#### 6.0 LPG STORAGE

#### Requirement Storage, handling and transportation of liquefied petroleum gas (LP gas) is completed in a manner ensuring protection of the environment. Finding **Specific Requirement** Satisfactory Not Satisfactory No Information Not Applicable The aggregate capacity of any one installation does not exceed a water capacity of 7570 L, or the requirements of the authority having jurisdiction. Containers are separated away from hazards such as aboveground tanks of flammable or combustible liquids, oxygen containers, and areas subject to flooding. Dispensing of LP gas is performed by a qualified attendant. Smoking is prohibited within 8 m of a point of transfer. 'No Smoking' signs are prominently displayed. Weeds, grass, brush, trash and other combustible materials are a minimum of 3 m away from LP gas containers. Containers are protected from exposure to damage by vehicles or other physical damage. Containers are stored within a suitable enclosure or otherwise protected against tampering, and are not subject to excessive temperature rise. Containers stored inside buildings are kept away from exit doors, stairways, or other areas normally used as a means of egress. Container valves are protected by screw-ontype caps or collars which are securely in place on all container stored, regardless of whether they are full, partly full, or empty. Guidance Refer to:

International Fire Code, Version 1.0 (2006), Chapter 38 (Liquefied Petroleum Gases)

#### 7.0 GROUNDWATER AND SOIL MONITORING

#### 7.1 Groundwater Monitoring Program

## Requirement

A groundwater monitoring program must be in place, to determine any on site contamination of groundwater, or possible off site movement.

Specific Dequirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
A groundwater sampling and monitoring				
program is in place to meet the regulations or				
guidelines.				
The groundwater sampling monitoring				
program is designed and installed by a				
professional hydrogeologist or other person				
authorized by the authority having jurisdiction				
after assessing the site to establish the				
number and positioning of the monitoring				
wells				
Records of groundwater sampling and				
monitoring programs are available.				
Stakeholder consultation regarding programs				
and results is documented.				
Sampling protocols are in place and sampling				
personnel are trained in sampling techniques,				
including chain of custody requirements.				
Analytical protocols are appropriate for				
potential sources.				
Groundwater monitoring wells are				
decommissioned when no longer required.				
Groundwater conditions associated with				
leaking tanks and spills have been				
investigated.				
Where appropriate, groundwater				
investigation reports have been distributed to				
regulators.				
Where appropriate, remediation programs				
have been undertaken.				

#### Guidance

Refer to: ARPEL Guideline #14 REFIN 28.0 Groundwater Monitoring

Groundwater monitoring is a site specific issue. Wells should be installed hydraulically up gradient and down gradient of a potential contaminant. These wells will be used to determine the depth and direction of groundwater flow. Monitoring wells must be set in an area that will not interfere with everyday operations; however, they must be set in order to collect the required information.

#### 7.2 Groundwater Monitoring Wells

Requirement Groundwater monitoring wells are appropriately installed and maintained.				
Specific Paguirament	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
When more than one monitoring well is necessary to monitor an installation				

effectively, the monitoring wells are		
numbered so that all monitoring and testing		
results can be easily correlated to a specific		
monitoring location.		
A monitoring well is equipped with a		
liquid-proof, lockable cap.		
A monitoring well is clearly distinguished from		
a fill pipe and marked with appropriate		
signage.		
Monitoring wells are secured to prevent		
unauthorized access and tampering.		
A monitoring well located in a traffic area is		
cut off at ground level and/or properly		
protected from vehicles.		
A damaged monitoring well is repaired or		
replaced within 30 days after discovery of the		
damage.		
Monitoring wells are checked for liquid		
product and/or vapors at least monthly, and		
records of inspections are kept.		
The product stored in a storage tank is		
immiscible in water and has a specific gravity		
of less than one.		
The hydraulic conductivity of the soil		
between a storage tank system and the		
monitoring wells is not be less than 0.01		
cm/s.		
The monitoring wells intercept the excavation		
zone of an underground storage tank or be		
as close as technically possible.		
A monitoring well is a minimum of 50 mm in		
diameter.		
If a monitoring well is to be used as a		
recovery well, the screened zone extends at		
least 1.5 m into the water table and at least		
1.5 m above the groundwater surface, as		
determined at the time of installation.		
The screened portion of a monitoring well is a		
minimum of 3.0 m in length and is factory		
slotted with a slot size of 0.25 mm or as		
approved by the authority having jurisdiction.		
The area around the screened portion of a		
monitoring well is surrounded by a filter pack.		
The filter pack extends to 0.5 m above the		
top of the screened portion of monitoring		
wells.		
The outside of a monitoring well is sealed		
from the ground surface to the top of the filter		
pack using bentonite, grout, or other material		
with equivalent performance.		
Where the groundwater surface is less		
than 2.5 m from the ground surface, a		
hydrogeologist or other person authorized by		
the authority having jurisdiction determines		

the length and position of:		
(a) the screened portion of a well;		
(b) the filter pack; and		
(c) the bentonite, grout, or other material with		
equivalent performance seal.		
A monitoring well is installed with a		
cap or plug at the bottom of the screened		
section of the well.		
Monitoring wells are constructed of		
flush joint, threaded, or bell and spigot		
Schedule 40 PVC or equivalent.		
A continuous monitoring device or a manual		
method are able to detect a minimum of 3		
mm of free product on top of the groundwater		
surface in the monitoring well.		
Guidance		

Refer to: CCME 2003. Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and allied Petroleum Products. Access at <a href="http://www.ccme.ca/">http://www.ccme.ca/</a>

#### 7.3 Soil Monitoring

#### Requirement

Soil sampling and monitoring protocols are in place according to guidelines. Sampling programs and results are documented and documentation is retained.

Specific Requirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
Where appropriate, records of soil sampling and monitoring programs are available.					
Soil conditions associated with leaking tanks or spills have been investigated and reports are available for review.					
Where appropriate, soil investigation reports have been distributed to regulators.					
Where appropriate, soil remediation programs have been undertaken.					

#### Guidance

Refer to: ARPEL Guideline #14 REFIN 27.0 Soil Sampling and Monitoring; ARPEL Environmental Guideline #37, Integrated Management of Wastes in Downstream Facilities, 2005.; ARPEL Environmental Guideline #3, Management of Petroleum Refinery Solid Waste.

Soil monitoring activities may be completed to track the progress of a decontamination program, to determine the extent of a spill and develop remediation programs. Soil monitoring may be undertaken at any time of a facility's life, from pre-disturbance, during operations or during reclamation.

#### 7.4 Stormwater Management

Requirement Stormwater run-on and run-off must be controlled to minimize contamination of local water bodies.				
Specific Requirement	Finding			
Specific Requirement	Satisfactory Not Satisfactory No Information Not Applicable			
The facility complies with stormwater				
monitoring requirements				
Surface water control and release structures				
exist and are shut to prevent accidental				

release of runoff water				
If in use, perimeter berms are place appropriately to divert surface water run off				
from impacting (erosion, contamination, etc.)				
adjacent soil, water or wetlands.				
Guidance				
Refer to				
ARPEL Guideline #14, REFIN 26.0 Surface Water Monitoring				
ARPEL Guideline #14, REFIN 24.0 Drainage and Erosion				

## 8.0 WASTE MANAGEMENT

Requirement				
The disposal of waste materials shall be in comp	nliance with ann	licable legislation	Verify that waste	as are disnosed
of properly by assessing the components of a w				23 arc disposed
	aste manageme	Find		
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
Wastes are managed by:	Cationation	110t Gatisiactory	110 miormation	11017 Ipplicable
a Minimizing the generation of wastes				
b Rendering hazardous wastes safe				
through destruction or treatment				
c Disposing in a secure manner when				
treatment is not feasible				
d Using technically-effective and cost-				
effective technologies				
Waste treatment and disposal choices have				
been made in consideration of: cost, local				
resources, legislation, and environmental				
impact.				
Information about the hazards and				
associated risks of hazardous wastes has				
been provided to employees, contractors,				
and other people on site.				
Incompatible wastes are not stored together.				
Waste containers are kept closed except				
when waste is being added or removed.				
Waste containers used are appropriate for				
the wastes they contain.				
Every waste container is labeled, stating the				
identity of the waste.				
Any materials spilled are contained and				
cleaned up.				
Waste disposal is carried out such that it				
does not attract wildlife.				
Guidance				
Refer to:				
Integrated Management of Wastes in Downstrea	am Facilities, AF	RPEL Guideline #3	37.	

#### 9.0 SITE DECOMMISSIONING

## **Requirement**The withdrawal from service and removal of storage tank systems must be in conformance with the requirements

of the authority having jurisdiction.

Specific Requirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
A storage tank system is removed by a					
company or individual that is authorized by					
the authority having jurisdiction.					
When a storage tank system has been					
permanently removed from service, the					
owner of a storage tank system ensures that:					
(a) petroleum products are removed and					
vapors purged from the storage tank, piping,					
dispensing, and transfer equipment; and					
(b) the storage tank, piping, dispensing, and					
transfer equipment are removed.					
If the site is contaminated with petroleum					
products, the site is remediated to the criteria					
defined by the authority having jurisdiction					
An underground storage tank system is not					
abandoned in-place.					
When a storage tank system is to be					
disposed of:					
(a) liquid petroleum product is removed from					
the storage tank system;					
(b) sludge in the storage tanks is removed					
and disposed of in a manner prescribed by					
the authority having jurisdiction;					
(c) the storage tank is purged of vapors;;					
(d) sufficient openings are be cut in the					
storage tank to render it unfit for further use;					
Guidance					

#### Guidance

Refer to:

International Fire Code, Version 1.0 (2006), Chapter 34, Flammable and Combustible Liquids

## APPENDIX E - ISO 14001 AUDIT PROTOCOL

Checklist for Conducting Environmental Audits ISO 14001:2004

Prepared for: Petroleum Corporation of Jamaica

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## 1.0 ENVIRONMENTAL MANAGEMENT SYSTEMS – ISO 14001

## 1.1 General Requirements – ISO 14001

Specific Requirement		Finding			
Specifi	ic Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.1-1	The organization shall establish, document, implement, maintain and continually improve an EMS in accordance with the requirements of this International Standard (ISO 14001:2004) and determine how it will fulfill these requirements.				
1.1-2	The organization shall define and document the scope of its EMS.				
Notes					

## 1.2 Environmental Policy

Chaoifia Daguirament		Find	ling	
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.2-1 Top Management shall define the				
organization's environmental policy and				
ensure that, within the defined scope of				
its EMS, it:				
a is appropriate to the nature, scale				
and environmental impacts of its				
activities, products or services,				
b includes a commitment to continual				
improvement and prevention of				
pollution,				
c includes a commitment to comply				
with applicable legal requirements				
and with other requirements to which				
the organization subscribes which				
relate to its environmental aspects,				
d provides the framework for setting				
and reviewing environmental				
objectives and targets,				
e is documented, implemented and maintained,				
f is communicated to all persons				
working for or on behalf of the				
organization, and				
g is available to the public.				
Notes				ı

## 1.3 Planning

## 1.3.1 Environmental Aspects

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.3.1-1 The organization shall establish,				
implement and maintain a				
procedure(s)				
a to identify the environmental				
aspects of its activities, products				
or services within the defined				
scope of the EMS that it can				
control and those that it can				
influence taking into account				
planned or new development, or				
new or modified activities,				
products and services, and				
b to determine those aspects that				
have or can have significant				
impact(s) on the environment (i.e.,				
significant environmental aspects).				
1.3.1-2 The organization shall document this				
information and keep it up to date.				
1.3.1-3 The organization shall ensure that				
the significant environmental aspects				
are taken into account in				
establishing, implementing and				
maintaining its EMS.				
Notes				

## 1.3.2 Legal and Other Requirements

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.3.2-1 The organization shall establish and maintain a procedure(s)				
a to identify and have access to the applicable legal requirements and other requirements to which the organization subscribes related to its environmental aspects, and				
b to determine how these requirements apply to its environmental aspects.				

1.3.2-2 The organization shall ensure that these applicable legal requirements and other requirements to which the organization subscribes are taken into account in establishing, implementing and maintaining it EMS.		
Notes		

## 1.3.3 Objectives, Targets and Programs

Specific Requirement	Finding				
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable	
1.3.3-1 The organization shall establish,					
implement and maintain documented					
environmental objectives and targets,					
at relevant functions and levels within					
the organization.					
1.3.3-2 The objectives and targets shall be					
measurable, where practicable, and					
consistent with the environmental					
policy, including the commitments to					
prevention of pollution, to compliance					
with applicable legal requirements					
and with other requirements to which					
the organization subscribes, and to					
continual improvement.					
1.3.3-3 When establishing and reviewing its					
objectives and targets, an					
organization shall take into account					
the legal and other requirements to					
which the organization subscribes,					
and its significant environmental					
aspects. It shall also consider its					
technological options, its financial,					
operational and business					
requirements, and the views of					
interested parties.					
1.3.3-4 The organization shall establish, implement and maintain a program(s)					
1 0 , ,					
for achieving its objectives targets. Program(s) shall include					
a designation of responsibility for					
a designation of responsibility for achieving objectives and targets at					
relevant functions and level of the					
organization, and					
uryanizalion, anu		Ì		]	

Specific Requirement	Finding			
	Satisfactory	Not Satisfactory	No Information	Not Applicable
b the means and time-frame by which they are to be achieved.				
Notes				

## 1.4 Implementation and Operation

## 1.4.1 Resources, Roles, Responsibility and Authority

Specific Requirement		Find	ling	
·	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.4.1-1 Management shall ensure the availability of resources essential to establish, implement, maintain and improve the environmental management system. Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.				
1.4.1-2 Roles, responsibilities and authorities shall be defined, documented and communicated in order to facilitate effective environmental management.				
1.4.1-3 The organization's top management shall appoint a specific management representative(s) who, irrespective of other responsibilities, shall have defined roles, responsibilities and authority for				
a ensuring that an EMS is established, implemented and maintained in accordance with this International Standard (i.e., ISO 14001),				
b reporting to top management on the performance of the EMS for review, including recommendations.				
Notes				

## 1.4.2 Competence, Training and Awareness

Specific Dequirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.4.2-1 The organization shall ensure that				
any person(s) performing tasks for it				
or on its behalf that have the				
potential to cause a significant				
environmental impact(s) identified by				
the organization is (are) competent				
on the basis of appropriate				
education, training or experience,				
and shall retain associated records.				
1.4.2-2 The organization shall identify				
training needs associated with its				
environmental aspects and its EMS.				
It shall provide training or take other				
action to meet these needs, and shall				
retain associated records.				
1.4.2-3 The organization shall establish,				
implement and maintain a				
procedure(s) to make persons				
working for it or on its behalf aware of				
a the importance of conformance				
with the environmental policy and				
procedures and with the				
requirements of the EMS,				
b the significant environmental				
aspects and related actual or				
potential impacts associated with				
their work, and the environmental				
benefits of improved personal				
performance,				
c their roles and responsibilities in				
achieving conformity with the				
requirements of the EMS, and				
d the potential consequences of				
departure from specified				
procedures.				
Notes		1	l	l
INOTOS				

## 1.4.3 Communication

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.4.3-1 With regard to its environmental				
aspects and EMS, the organization				
shall establish, implement and				
maintain a procedure(s) for	1			
a internal communication between	1			
the various levels and functions of				
the organization,				
b receiving, documenting and	1			
responding to relevant				
communication from external				
interested parties.	1			
1.4.3-2 The organization shall decide				
whether to communicate externally				
about its significant environmental				
aspects, and shall document its				
decision. If the decision is to				
communicate, the organization shall				
establish and implement a method(s)				
for this external documentation.				
Notes				

## 1.4.4 Documentation

Specific Requirement		Find	ing	
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.4.4-1 The EMS documentation shall				
include				
a the environmental policy,				
objectives and targets,				
b description of the scope of the				
EMS,				
c description of the main elements				
of the EMS and their interaction,				
and reference to related				
documents,				
d documents, including records,				
required by this International				
Standard (i.e., ISO 14001), and				
e documents, including records,				
determined by the organization to				
be necessary to ensure the				
effective planning, operation and				
control of processes that relate to				
its significant environmental				
aspects.				
Notes				

## 1.4.5 Control of Documents

Specific Requirement	Finding			
'	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.4.5-1 Documents required by the EMS and				
by this International Standard (i.e.,				
ISO 14001) shall be controlled.				
Records are a special type of				
document and shall be controlled in				
accordance with the requirements				
given in 4.5.4.				
1.4.5-2 The organization shall establish,				
implement and maintain a				
procedure(s) to				
a approve documents for adequacy				
prior to issue,				
b review and update as necessary				
and re-approve documents,				
c ensure that changes and the				
current revision status of				
documents are identified,				
d ensure that relevant versions of				
applicable documents are				
available at points of use,				
e ensure that documents remain				
legible and readily identifiable,				
f ensure that documents of external				
origin determined by the				
organization to be necessary for				
the planning and operation of the				
EMS are identified and their				
distribution controlled, and				
g prevent the unintended use of				
obsolete documents and to apply				
suitable identification to them if				
they are retained for any purpose.				
Notes				

## 1.4.6 Operational Control

Specific Requirement		Find	ling	
<u> </u>	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.4.6-1 The organization shall identify and				
plan those operations that are				
associated with the identified				
significant environmental aspects				
consistent with its environmental				
policy, objectives and targets, in				
order to ensure that they are carried				
out under specified conditions, by				
<ul> <li>a establishing, implementing and</li> </ul>				
maintaining a documented				
procedure(s) to control situations				
where their absence could lead to				
deviation from the environmental				
policy, objectives and targets,				
b stipulating the operating criteria in				
the procedure(s), and				
c establishing, implementing and				
maintaining procedures related to				
the identified significant				
environmental aspects of goods				
and services used by the				
organization and communicating				
applicable procedures and				
requirements to suppliers,				
including contractors.				
Notes				

## 1.4.7 Emergency Preparedness and Response

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.4.7-1 The organization shall establish,				
implement and maintain a				
procedure(s) to identify potential				
emergency situations and potential				
accidents that can have an impact(s)				
on the environment and how it will				
respond to them.				
1.4.7-2 The organization shall respond to				
actual emergency situations and				
accidents and prevent or mitigate				
associated environmental impacts.				
1.4.7-3 The organization shall periodically				
review and, where necessary, revise				
it emergency preparedness and				
response procedures, in particular,				
after the occurrence of accidents or				
emergency situations.				
1.4.7-4 The organization shall also				
periodically test such procedures				
where practicable.				
Notes				

## 1.5 Checking

## 1.5.1 Monitoring and Measurement

Specific Requirement	Finding			
	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.5.1-1 The organization shall establish, implement and maintain a procedure(s) to monitor and measure, on a regular basis, the key characteristics of its operations that can have a significant environmental impact. The procedure(s) shall include the documenting of information to monitor performance, applicable operational controls and conformity with the organization's environmental objectives and targets.				
1.5.1-2 The organization shall ensure that calibrated or verified monitoring and measurement equipment is used and maintained and shall retain associated records.				
Notes				

## 1.5.2 Evaluation of Compliance

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.5.2-1 Consistent with its commitment to				
compliance, the organization shall				
establish, implement and maintain a				
procedure(s) for periodically				
evaluating compliance with				
applicable legal requirements.				
1.5.2-2 The organization shall keep records				
of the results of the periodic evaluations.				
1.5.2-3 The organization shall evaluate				
compliance with other requirements				
to which it subscribes. The				
organization may wish to combine				
this evaluation with the evaluation of				
legal compliance referred to in				
4.5.2.1 or to establish a separate				
procedure(s).				
1.5.2-4 The organization shall keep records				
of the results of the periodic				
evaluations.				
Notes				

## 1.5.3 Nonconformity, Corrective Action and Preventive Action

Specific Requirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.5.3-1 The organization shall establish,				
implement and maintain a				
procedure(s) for dealing with actual				
and potential nonconformity(ies) and				
for taking corrective action and				
preventive action. The procedure(s)				
shall define requirements for				
a identifying and correcting				
nonconformity(ies) and taking				
action(s) to mitigate their				
environmental impacts,				
b investigating nonconformity(ies),				
determining their cause(s) and				
taking actions in order to avoid				
their recurrence,				
c evaluating the need for action(s) to				
prevent nonconformity(ies) and				
implementing appropriate actions				
designed to avoid their				
occurrence,				

<ul> <li>d recording the results of corrective action(s) and preventive action(s) taken, and</li> </ul>		
<ul> <li>reviewing the effectiveness of corrective action(s) and preventive action(s) taken.</li> </ul>		
1.5.3-2 Actions taken shall be appropriate to the magnitude of the problems and the environmental impacts encountered.		
1.5.3-3 The organization shall ensure that any necessary changes are made to EMS documentation.		
Notes		

## 1.5.4 Control of Records

Specific Dequirement	Finding			
Specific Requirement	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.5.4-1 The organization shall establish and maintain records as necessary to demonstrate conformity to the requirements of its environmental management system and of this International Standard, and the results achieved.				
1.5.4-2 The organization shall establish, implement and maintain a procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records.				
1.5.4-3 Records shall be and remain legible, identifiable and traceable.				
Notes				

## 1.5.5 Internal Audit

Specific Requirement	Finding			
	Satisfactory	Not Satisfactory	No Information	Not Applicable
1.5.5-1 The organization shall ensure that				
internal audits of the environmental				
management system are conducted at planned intervals to				
-				
a determine whether the				
environmental management				
system				
conforms to planned     arrangements for				
environmental management				
including the requirements of				
this International Standard (i.e.,				
ISO 14001), and				
2. has been properly implemented				
and is maintained, and				
b provide information on the results				
of the audit to management.				
1.5.5-2 Audit program(s) shall be planned, established, implemented and				
maintained by the organization,				
taking into consideration the				
environmental importance of the				
operation(s) concerned and the				
results of previous audits.				
1.5.5-3 Audit procedure(s) shall be				
established, implemented and				
maintained that address				
<ul> <li>the responsibilities and</li> </ul>				
requirements for planning and				
conducting audits, reporting				
results and retaining associated				
records,				
the determination of audit criteria,				
scope, frequency and methods.  1.5.5-4 Selection of auditors and conduct of				
audits shall ensure objectivity and				
the impartiality of the audit process.				
Notes		ı	<u> </u>	<u>I</u>

## 1.6 Management Review

Specific Requirement		Finding			
		Satisfactory	Not Satisfactory	No Information	Not Applicable
1.6-1	Top management shall review the				
	organization's environmental				
	management system, at planned				
	intervals, to ensure its continuing				
	suitability, adequacy and				
	effectiveness. Reviews shall include				
	assessing opportunities for improvement and the need for				
	changes to the EMS, including the				
	environmental policy and				
	environmental objectives and targets.				
	Records of the management reviews				
	shall be retained.				
1.6-2	Input to management reviews shall				
	include				
	a results of internal audits and				
	evaluations of compliance with				
	legal requirements and with other				
	requirements to which the				
	organization subscribes,				
	b communication(s) from external				
	interested parties, including				
	complaints,				
	c the environmental performance of				
	the organization,				
	d the extent to which objectives and				
	targets have been met, e status of corrective and preventive				
	actions,				
	f follow-up actions from previous				
	management reviews,				
	g changing circumstances, including				
	developments in legal and other				
	requirements related to its				
	environmental aspects, and				
	h recommendations for				
	improvement.				
1.6-3	The outputs from management				
	reviews shall include any decisions				
	and actions related to possible				
	changes to environmental policy,				
	objectives, targets and other				
	elements of the EMS, consistent with				
	the commitment to continual				
Notes	improvement.		1		l
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#### **ARPEL**

#### Regional Association of Oil and Natural Gas Companies in Latin America and the Caribbean

Established in 1965, ARPEL is an association of 27 state owned and private oil and gas companies and institutions with operations in Latin America and the Caribbean, which represent more than 90 percent of the Region's upstream and downstream operations. Since 1976, ARPEL holds formal UN-ECOSOC special consultative status.

ARPEL works together with its members –through its various Committees and Working Groups- on issues that contribute to sustainable development in the Region:

- *Economic issues*: regional energy integration, pipelines and terminals, downstream and fuels
- *Environmental issues*: climate change, atmospheric emissions, oil spill contingency plans and best practices in environment and occupational health and safety management.
- Social issues: corporate social responsibility and relations with indigenous peoples

ARPEL develops a proactive attitude on issues of interest to the industry and produces documents representing the views of its members. It also promotes interaction among its members and with governments building alliances and establishing agreements with international organizations with the aim of presenting and developing a regional perspective. To accomplish its objectives, ARPEL organizes regional workshops and symposia to share information and best practices and develops technical documentation for capacity building and information exchange on the issues of interest to its members. To support its management ARPEL has an interactive Portal in which all documents developed by ARPEL Technical Committees and Working Groups are available for its Members. This tool also facilitates the virtual interaction within the ARPEL community and with those stakeholders that interrelate with it.



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