

SP-1 Panel Project - *Development of Shipyard SPCC Guidebook*

SP-1 Panel Project Progress Report

NSRP Conference

New Orleans, LA

February 2007





Development of Shipyard SPCC Guidebook: SP-1 Panel Project Selection

Listed on the *Potential Panel Projects/
Presentation Topics Survey* distributed to
members in 2005



Proposal for Guidebook for Implementing the
New SPCC Regulations in Shipyards submitted
in September 2006

Notification of project funded received in
November 2006

Awarded to O'Brien & Gere in December
2006 by ATI



Development of Shipyard SPCC Guidebook: SP-1 Panel Project Contract



TIME AND MATERIALS, COMPLETION SUBCONTRACT
SUBCONTRACT NUMBER 2007-353

F.3 TECHNICAL AND ADMINISTRATIVE REPRESENTATIVES

1. The following technical and administrative representatives of the Contractor and Subcontractor are hereby designated for this Subcontract:

Subcontractor's Representatives are:

Daniel Coleman - Contract & Technical Representative

Contractor's Representatives are:

Jim House - Technical Representative

Frank Thorn - NSRP Program Technical Representative (PTR)

Melissa Ingram - Subcontract Representative

TOTAL PROGRAM COST

\$37,910

Signed - December 18, 2006
Revised - January 8, 2007



Development of Shipyard SPCC Guidebook: **Tasks and Deliverables**

Task Description

Task 1

- Prepare and send out the survey to identify specific questions and challenges are being experience in meeting SPCC requirements.
 - Survey recipients: Shipyard Environmental Managers (within 5 days of Notice to Proceed. Estimated 12/1/06)
 - Task performed by: O'Brien & Gere Personnel: Donna Watkins, CHMM; Page Partain, PE

Task 2

- Draft SPCC Guidebook for Shipyards
 - Prepare draft and submit to NSRP Environmental Technologies Panel Chair by 1/31/07
 - Task performed by: O'Brien & Gere Personnel: Donna Watkins, CHMM; Page Partain, PE; Marv Richardson, and Derek Pizzaro.
Technical Review: Tina Bickerstaff, CPG; Scott Scheidelman, PE
Project Director: Daniel G. Coleman, PE

Task 3

- Incorporate Comments and Prepare final Guidebook
 - Within 10 business days of receipt of comments: Estimated 2/28/07
 - Task performed by: O'Brien & Gere Personnel: Donna Watkins, CHMM; Page Partain, PE; Marv Richardson, and Derek Pizzaro.

Task 4

- Presentation/Training at NSRP Conference – Spring/Summer Meeting 2007

Deliverables

1. Task 1, copy of questionnaire sent to shipyards – January 15, 2007
2. Task 2, copy of draft guidebook - January 31, 2007
3. Task 3, Final Guidebook – February 28, 2007
4. Task 4, copy of presentation and training handouts – June/July, 2007
5. Project Status Report – March 30, 2007
6. Project Status Report – June 30, 2007
7. Final Written Report – July 31, 2007



Development of Shipyard SPCC Guidebook: Schedule

Project schedule revised due to USEPA SPCC Rule revision:

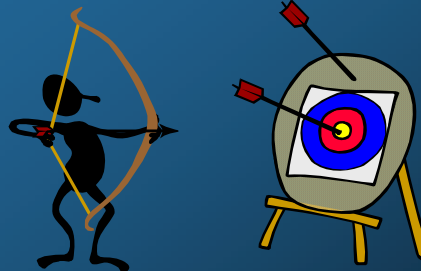
- In 2004 - SPCC Rule compliance by August 2006...
 - In 2005 - SPCC Rule compliance by November 2006...
 - In 2006 - SPCC Rule compliance by October 2007...
 - In Dec. 2006 - SPCC Rule compliance by July 2009...

Initial Project Deadlines:

Draft guidebook due 1/31/07
Comments incorporated by 2/28/07
Presentation to members Spring
NSRP meeting

Final Project Deadlines:

Draft guidebook due 2/28/07
Comments incorporated by 3/30/07
Presentation to members Summer
NSRP meeting





Development of Shipyard SPCC Guidebook: Questionnaire

SPCC SURVEY FOR NSRP SHIPYARDS	
Facility Information	
Facility Name:	
Facility Address:	
Contact Information	
Name:	Email:
Title:	Phone:
Does your job function entail responsibilities other than environmental management?	
Describe:	
Status of Facility SPCC Plan	
Does your site have a written SPCC Plan?	
	When was it first issued?
	Last revised?
Was the Plan developed internally or by an outside consultant/contractor?	
Has your facility developed a Facility Response Plan (FRP) or Integrated Contingency Plan (ICP)?	
Does your facility have written procedures or plans that overlap with SPCC requirements (for example, Navy or facility SOPs, management directives, etc.)?	
What are your biggest SPCC compliance challenges? Check all that apply.	
Knowing/understanding the requirements (Specify in comments)	
Maintaining an up-to-date written plan	
Performing required inspections	
Proper documentation of inspections	
Employee training	
Describe spill training program: how often, method of instruction (video, slides, etc.), who administers the training (consultant or in-house).	
Facility upgrades - expense or practicability	
Other	
Describe:	
Check all of the following that are present at your facility (regardless of proximity to water):	
Underground Storage Tanks containing petroleum	
Oil-filled Transformers	

Customize the guidebook to meet the specific needs of shipyards

Address NSRP members' SPCC challenges and issues

Met with NSRP member to develop most effective survey

Assist NSRP members to:

- Reduce labor costs involved in prep of SPCC Plans
- Be compliant with new Rule
- Avoid penalties



Development of Shipyard SPCC Guidebook: Questionnaire Recipients

The Questionnaire was sent on January 15, 2007 via electronic mail to the following shipyard members:

- **Frank “Hogie” Thorn - Northrop Grumman Newport News**
- **Wayne Holt - Atlantic Marine**
- **Donna Elks - Electric Boat**
- **Mike Ewing - BAE Systems Norfolk Ship Repair**
- **Frank Wheatley - Colonna’s Shipyard, Inc.**
- **Mark Ross - Northrop Grumman Ship Systems (Ingalls)**
- **Shawn Halvax - BAE Systems Southwest Marine**
- **Mike Chee - NASSCO**
- **Dave Kopak - Navy Representative**
- **Vince Dickinson - Bath Iron Works**
- **Al Rainsberger - Todd Shipyard and Foss Shipyard**

List was developed to represent shipyards and Environmental Managers were requested to distribute within their organization



Development of Shipyard SPCC Guidebook: **Questionnaire Response Summary**

Ten (10) responses were received:



Key points:

- All responding facilities were subject to Coast Guard FRP requirements
- All responding facilities operate a wastewater treatment plant
- Tank size ranges from 150 to 100,000 gallon capacity
- Only one responding facility has a truck loading/unloading rack
- Some training is out-sourced

Areas where guidance was requested:

- clarification regarding non-motive portable equipment, i.e. compressors, generators, and pumps.
- requirements for rental or subcontractor equipment on site.
- demonstration of adequacy of inspections in lieu of integrity testing.
- general requirements for tank inspections and record-keeping.
- Revisions incorporated into new Rule, e.g. lowering reporting threshold for releases, more training requirements, and new certification language.





Development of Shipyard SPCC Guidebook: **Project Status**

Budget:

\$37,910 - Total Authorized

\$1,150 - Survey preparation

\$23,210 - Draft guidebook

\$9,050 - Finalize guidebook

\$ 4,500 - Present and train

\$14,200 - Invoiced to Date

\$ 23,710 - Remaining



Schedule:

Questionnaire distributed 1/15/07

Draft completed ~70%

Draft due 2/28/07





Development of Shipyard SPCC Guidebook: Questions/Comments

