

EGYPTIAN REFINING COMPANY (ERC)  
ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT  
ERC HYDRO-CRACKING COMPLEX PROJECT AT MOSTOROD  
APPENDIX 12.6 – OIL AND FUEL MANAGEMENT PLAN

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# ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

## ERC Hydro-Cracking Complex Project at Mostorod FINAL VERSION

### Appendix 12.6 – Oil and Fuel Management Plan

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#### Infrastructure and Environment

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## **1. INTRODUCTION**

### **1.1 Purpose**

The objective of the Oil and Fuel Management Plan (OMP) is to define oil and fuel (hydrocarbon) storage procedures to ensure that such materials are transported, stored and any spillages cleaned up in accordance with legal requirements, International and European Financial Institutions requirements, and ERC's requirements and commitments. As described in Chapter 12, the final version of the OMP will be prepared by the Contractor around the time of mobilising to Egypt. However, a preliminary draft OMP is presented here to enable a clear understanding of the approach and content of the Plan. At mobilisation, the Contractor will prepare all the necessary proforma and inspection procedures as required by EEAA and other relevant Regulators. At this early stage, information is not available on the storage facilities that will be used by the Contractor. Similarly, information is not available on the storage arrangements and facilities for waste oils, such as those generated during oil changes in plant and machinery, generators and the like. These storage facilities (and waste storage facilities in the waste yards) will be established on each of the sites as required.

The contractor operates Environmental Management Systems in accordance with ISO 14000 principles and requirements (refer to Appendix 9 for additional details). Subsequently, in order to maintain certification, the Contractor must show a continuous improvement in reducing their impact on the environment, including that impact associated with its oil and fuel usage.

### **1.2 Scope**

The OMP provides guidance relating to all activities undertaken by the Contractor in implementing this Project which involve hydrocarbon storage and usage. All waste hydrocarbons and unwanted materials arising from the works shall be disposed of in accordance with the Project Waste Management Plan, EEAA and Client requirements.

The final plan will cover:

- Procedures for the use and storage of oil and fuels on site
- Disposal of waste hydrocarbons to Registered Carriers
- Procedures for clean up and remediation of any spillages
- Oily waste documentation
- Checking and monitoring of final waste disposal arrangements (refer to Waste Management Plan)

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## **1.3 Responsibilities**

### **Project Director/Project Managers**

The Project Director/Project Managers are specifically responsible for:

- Overall responsibility for ensuring that the Project prepares and implements the Project Environmental Management Plan together with any Procedures and Method Statements and complies with all legislative and contract requirements.
- Representing matters relating to the project with the Client, Project Management Consultants and the Regulatory Authorities.
- Ensuring sufficient resources (people time and money) to plan, execute and monitor environmental aspects of the contract, specifically the management of oil and fuels.
- Co-operating with internal and external audits of oil and fuel management; deciding and implementing appropriate actions resulting from environmental audits, environmental incidents and complaints.
- Managing of relationships between the Contractor, external environmental organisations/agencies and the general public.

### **Environmental Control Supervisor**

The Environmental Control Supervisor is site-based and specifically responsible for:

- Ensuring that line management is aware of their obligations and responsibilities. Co-ordinating all environmental input to the Project.
- Preparation and maintenance of the Project Environmental Management Plan (PEMP) and the OMP.
- Ensuring the OMP, Procedures and Instructions are in place and complied with.
- Liaison with the Client, EEAA, waste contractors, Statutory & Non-Statutory Authorities and Third Parties on all hydrocarbon waste matters.
- Liaison on a day-to-day basis with Project Management and in particular the Construction and Transport Departments at the work face.
- Carrying out Weekly Site Inspections and hydrocarbon management awareness.
- Development and provision of induction training and tool box talks.

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### **Yard Supervisor(s)**

- Ensuring Construction Site Bases (North and South Plots and Laydown areas) are kept clean and tidy of hydrocarbon spillages at all times.
- Ensuring oil and fuels are properly segregated, clearly labelled, and any wastes sent to the appropriate licensed disposal site according to the WMP.
- Ensuring all drums, cages and skips are labelled with the type of oily waste they contain, are kept in good condition and fitted with secondary containment and/or covers as required.
- Contacting appropriate licensed contractors to arrange timely removal of oily waste and ensuring the contents are correctly described on Transfer Notes.

### **Transport Department**

- The Transport Department, headed up by the Transport Manager shall ensure that all oil and fuel storage procedures are adhered to.
- Ensuring that all vehicles and plant are refuelled according to procedures that prevent or minimise spillage of polluting material to ground or surface water, through the use of hard standing or drip trays or absorbent pads as appropriate.

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## **2. PROCEDURE**

### **2.1 Oil and Fuel Storage Management**

The Contractor shall ensure that oil and fuels stored on the site base is stored securely so as to reasonably prevent its spillage and contamination of water and groundwater, theft and vandalism. The oil and fuels storage area shall be sited in a secure area to minimise the risk of damage by site traffic and shall be a minimum of 30 metres from surface drains and watercourses. The facility will be bunded so to retain 110% of the volume of the liquid stored within the container. Where separate vessels are used within the bund, the bund must be capable of retaining 125% of the capacity of the largest vessel.

Drip trays, pans or absorbent pads shall be used during refuelling of vehicles or plant in areas that do not consist of hard stand with spillage control. Refuelling procedures shall be developed and adhered to by all plant operators.

#### **2.1.1 Spillage clean up and remediation**

The Contractor will develop a Project procedure for the routine clean up of all hydrocarbon spillages that occur on all its sites. The procedures will be supported by provision of spill clean up kits (spill kits) to relevant personnel and vehicles and delivery of training at Project Induction and during Toolbox Talks. An example of the Toolbox Talk is attached at the rear of this Plan.

#### **2.1.2 Recycling**

The Contractor shall investigate the opportunities for the recycling of used oils and implement those which prove practical and cost-effective.

#### **2.1.3 Disposal Sites**

The contractor shall dispose of surplus material, such as used oil from vehicle and plant servicing, in accordance with the Waste Management Plan, so as to avoid any environmental pollution.

#### **2.1.4 Documentation**

The contractor will maintain appropriate documentation showing the layout of the storage facilities and a paper trail for surplus material management, showing types and volumes of hydrocarbons that have been recycled or disposed of.

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### **2.1.5 Monitoring and Auditing**

The contractor shall undertake regular checks and inspections to confirm that oil and fuels are being stored in accordance with Project procedures and any measures are taken to rectify non-compliances. External checks and audits are also anticipated by Financers' representatives.

Monitoring shall be undertaken by the Environmental Supervisor/Designated Person in conjunction with the transport department to ensure compliance.

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## Toolbox Talk: Spill Response

**Why is this important?**

Accidental releases of oils and chemicals from plant and machinery on construction sites can occur due to faulty equipment, burst hoses, over-filled fuel tanks, vandalism of machinery and attempted theft of fuel from plant.

**QUESTIONS**

- Are site personnel aware of the need to wear appropriate PPE when dealing with a spill?
- Are they familiar with the general procedure for tackling a spill i.e.:

**STOP- CONTAIN - NOTIFY**

- Are site staff aware of the location of the nearest spill kits and of their contents?
- Have key staff been trained in the use of spill kits?
- What should happen to contaminated clean up materials?
- Why should spills not be washed into the drainage system?
- For further information, contact your environmental coordinator or any member of the Environment team.

**DO'S**

- **STOP IT**
- **CONTAIN IT**
- **REPORT IT**
- Identify source of spill and stem flow
- Prevent the spill from spreading
- Report spill to foreman/environmental department
- ✓ On land, earth or sand can be used to contain a spill by constructing a bund around the spill to stop it spreading.
- ✓ If oil has entered a watercourse booms and pads can be used to contain spills.
- ✓ Protect drains and watercourses.
- ✓ Use absorbent granules/pads/sawdust etc to clean up a spill.
- ✓ Contaminated material and used spill kits must be disposed of as hazardous waste at construction yards.
- ✓ Ensure incident is reported to environmental department.
- ✓ Inform environmental response crew.

**DON'TS**

- ✗ DON'T ignore it! STOP WORK and ACT immediately.
- ✗ DON'T hide the incident – ensure you report it and implement controls.
- ✗ DON'T attempt to tackle a spill if you are not sure what you are dealing with, inform the environmental response crew.
- ✗ DON'T ever hose a spill into the drainage system. Always use absorbent materials.

