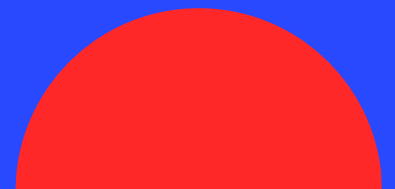
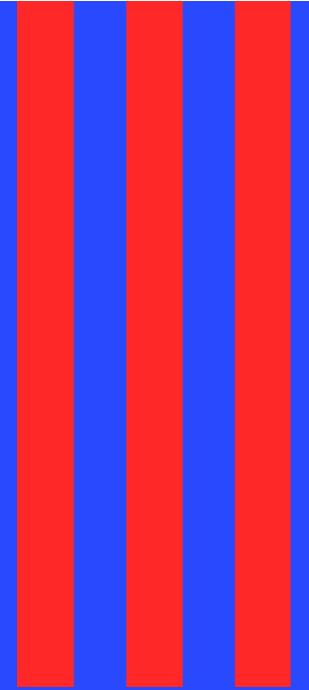


# **The Hidden Environmental Risk:**

**Support Areas, Wash  
Pads and Waste  
Staging Areas**



# Overview

Introduction

Environmental Risk Areas

Support Areas

Wash Pads

Waste Staging Zones

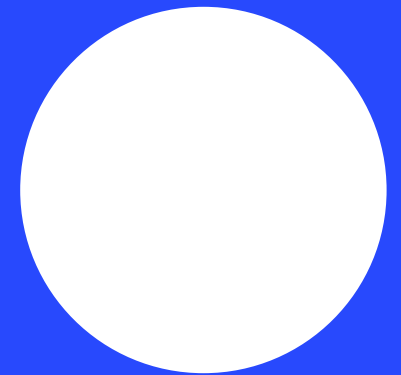


# Background

- Dakota Smith
- Pro Waste  
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# **Environmental Risk Areas**





# Common Areas of Concern

Air Emissions from zones around Boilers, turbines, flares, crude/vacuum units, FCC units, Sulfur Recovery Units, Cooling Towers, Etc.

Flaring Systems and relief valves are huge regulatory exposure points.

Wastewater & Stormwater Areas such as API Separators, oily water drains, cooling tower blowdown areas, wastewater treatment units, Etc.

Stormwater mixing with hydrocarbons in tank farms is another common area of concern.

Storage Tanks and Secondary Containment areas



# Hidden Risk Areas

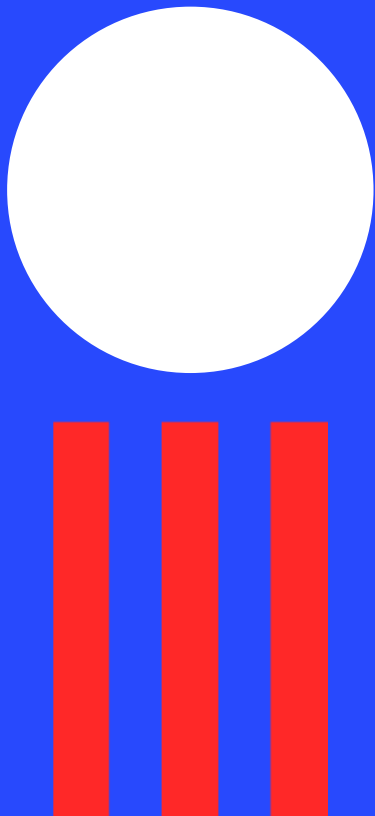
Areas that garner less attention



# Support Areas

- 90 Day Storage
- Laydown Yards
- Maintenance Shops
- Truck Loading/Unloading Racks(outside main process areas)
- Firewater & Foam Systems
- Temporary(Permanent Areas)
- Cooling Towers (Support Side)
- Utility Corridors/Pipe Racks
- Labs and Sample Stations
- Stormwater Infrastructure
- Backup Generators and Battery Rooms
- Construction/Expansion Projects

# Wash Pads



- Oil Sheen into storm drains
- Detergents/Degreaser comingling with surface water
- Heavy metals from equipment run off
- Sediment Buildup carrying hydrocarbons
- Oil/Grease Overload
- Cracked Concrete/failed joint seals = containment bypass
- Chemical Handling/Storage Issues
- Improper Waste Disposal (think: solids into drains, sludge at bottom of sump)
- VOC/Air Emissions
- Soil/Groundwater Risk=Remediation Issue
- Spills
- Documentation/Permit Gaps

# Staging Areas

- Temporary becomes permanent (often started for short-term laydown area/yards turn into month long storage areas)
- No secondary containment
- No Stormwater controls
- No Surface protection
- No Inspection programs



# Staging Areas Continued

- Documentation Blind Spot (lacks clear assignment often)
- Waste Misclassification
- Waste put into improper bins
- Firewater run off risk (when staged equipment catches fire)
- **BIGGEST RISK** (Lack of ownership, mapping, inspection, and engineering controls)



# Summary

## Hidden Risk Area

- Waste Staging Areas
- Wash Pads
- Support Areas
- “There was an important job to be done, and Everybody was sure that somebody would do it. Any could have done it, but nobody did it.”
- “It ended up that Everybody blamed Somebody when Nobody did what Anybody could have.”

# Questions?

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