

Chapter 5: Spill Notification and Response

1. Purpose

This procedure implements spill notification and response actions at Fort Greely (FGA). It is intended to protect human health, property and natural resources from damages caused by spills of hazardous substances and comply with the requirements of the Alaska Department of Environmental Conservation (ADEC), the U.S. EPA, and the U.S. Army.

2. Scope

This procedure covers the notification and response actions that will be taken when a spill is first discovered. In addition to this procedure, FGA maintains a Spill Prevention and Response Plan (SPRP) that incorporates the Alaska Oil Discharge Prevention and Contingency Plan and U.S. EPA Spill Prevention, Control and Countermeasure Plan requirements and provides greater detail on oil spill prevention and response. Detail that can be found in the SPRP, but not in this procedure include: measures and activities undertaken to prevent oil discharges; operational overview and background information; tank inventories and spill sources; secondary containment and leak detection systems best available technology; and inspections and testing.

This procedure does not apply to activities at facilities owned and access-controlled by DU or to DU activities on DU rights of way. For activities of DU, or DU contractors, occurring on Fort Greely but outside facilities or rights of way controlled by DU, this procedure applies as if DU was a contractor (Section 3(g) below).

3. Responsibilities

a. Garrison Commander

The Garrison Commander is the responsible official for environmental compliance at FGA and provides overall policy and guidance associated with environmental compliance. The Commander will consult regularly with the FGA Department of Public Works Environmental Office to insure that the installation's environmental policies and procedures are consistent with federal, state and Army requirements and are properly implemented. The Commander will consult regularly with all installation tenant organizations and departments and facilitate resolution of conflicts regarding environmental matters that cannot be resolved at lower levels.

b. Department of Public Works (DPW)

For major incidents the DPW Director, through the Emergency Operations Center, is responsible for the allocation and direction of DPW and external response resources necessary to respond to spills and providing approvals for excavations undertaken in spill response operations.

c. FGA Fire Chief

The FGA Fire Chief or Senior Fire and Emergency Services Official is the Ft. Greely Incident Commander (IC) at the time of spill notification. The IC is responsible for overall command of response, decides on response strategy, oversees response, determines adequacy of response, and coordinates response activities with state and federal agencies through the Emergency Operations Center. The Fire and Emergency Services receives initial spill notification.

In addition the FGA Fire Chief will:

- (1) Act as Safety Officer, or designate a Safety Officer, for spill incident response and preparation of the site safety plan, with support from the Ft. Greely Safety Manager.
- (2) Ensure appropriate rescue, fire fighting, and emergency response training is provided and drills are conducted to effectively and safely respond to emergencies.
- (3) When notice of a spill is initially received, make a determination whether the emergency response team will respond or if the spill can be safely cleaned by personnel in the immediate area. Fire and Emergency Services may make this determination at the time of the initial call or after responding to the spill.
- (4) Ensure appropriate spill response equipment and supplies are maintained, secured, and ready for immediate response.

d. FGA DPW Environmental Office (FGAENV)

As the Garrison Commander's environmental representative, the FGAENV will be the point of contact for interface with Federal, State, and local environmental regulatory agencies on all environmental compliance matters associated with Garrison and tenant activities.

In addition the FGAENV will:

- (1) Provide technical support to the Incident Commander and oversight of response activities to ensure compliance with this procedure and applicable regulations.
- (2) After the initial Fire and Emergency Services response is complete and site conditions are controlled, the Fire and Emergency Services Incident Commander may turn over the control of the cleanup action to the FGA Environmental Coordinator, or qualified designee, who will act as on-site Incident Commander until the cleanup is completed.
- (3) Provide direction to personnel in the immediate release area, if they are able to safely control and clean up the spill and have been authorized by the Fire and Emergency Services to clean it up.
- (4) Report spills to Army and external regulatory agencies.

(5) Track reportable spill events to determine trends and preventive measures.

(6) Ensure this procedure remains current and accurate.

(7) Update and distribute the Spill Response Call Tree (Attachment 1).

(8) Coordinate spill response drills at least annually.

(9) Coordinate the proper disposal of contaminated spill residue.

e. FGA Safety Manager

The FGA Safety Manager will:

(1) Provide safety support during response actions and drills.

(2) Provide assistance preparing the Site Safety Plans during responses.

(3) Inspect (as necessary) the medical monitoring and surveillance program for FGA elements.

(4) Inspect (as necessary) the training program(s) for FGA elements.

f. FGA Police

FGA Police will provide security and evacuation support within the Incident Command structure.

g. FGA Directorates, Tenants and Contractors

FGA Directorates, Tenants and Contractors will designate a person who will represent the contractor or tenant and be responsible for incident response activities. The person must have the authority and ability to direct resources on-site. Directs initial spill response and cleanup activities and, as capabilities permit, complete cleanup operations under the oversight of the IOSC. Tenants and contractors will train all employees and sub-contractors on spill recognition, notification and initial response activities as required by this procedure.

4. Operations

a. Definitions

(1) Antifreeze - ethylene glycol, propylene glycol, or triethylene glycol.

(2) Emergency Response - Means a response effort by designated responders to a release of a hazardous substance.

- (3) Hazardous Substance - Any hazardous waste, or substance listed by the U.S. Dept. of Transportation as a hazardous material under 49 CFR 172.101, or any biological or disease causing agent that when released may cause health damage.
- (4) Petroleum Products (POL) - Diesel fuel, gasoline, JP-4, other distillate fuels, lube oils, non-hazardous used oil, hydraulic oils/fluids, and brake fluids.
- (5) Responder - A person with specific training, knowledge and experience in the area for which the person has the responsibility and the authority to control a spill.
- (6) Spill - An unpermitted release of a petroleum product, hazardous material, hazardous waste, toxic waste or material, or other regulated material; discovery of a past, unreported spill; or discovery of contamination, or possible contamination. The emission of volatile organic compounds from the normal use of hazardous materials (e.g. painting and degreasing) does not constitute a release. For the purposes of this procedure, the terms spill and release are synonymous. Discoveries of contamination, or suspected contamination, of unknown origin are considered a spill or release for purposes of this procedure.
- (7) Reportable Spill - A reportable spill is any one or combination of the following:
 - (a) A spill of any hazardous substance of any amount and to any location
 - (b) A spill of POL or antifreeze outside an impermeable secondary containment structure of one gallon or more.
 - (c) A spill of POL or antifreeze inside an impermeable secondary containment structure of 55 gallons or more.
 - (d) A spill of POL or antifreeze of any quantity to a waterway
 - (e) Discovery of a spill or contamination of unknown origin

b. Reportable Spills or Discovered Contamination

Any person that discovers a reportable spill or discovers any contamination must immediately report the discovery to the Ft. Greely Fire and Emergency Services at 911 (on-post phone) or 873-3473 (873-FIRE). Reporting a spill or potential contamination, in and of itself, does not assign or imply responsibility for the spill or potential contamination to the reporting individual.

c. Initial Actions Upon Discovery of a Spill or Potential Contamination

- (1) Upon discovery of a spill or potential contamination all work in the area shall cease (except for immediate response actions), workers shall be removed, and access to the affected area shall be restricted until further notice. Concurrently, the notification process below shall be initiated.

- (2) Immediate response actions shall be taken only by persons adequately trained and may include:
 - (a) Eliminating routes to water (e.g., closing/blocking floor drains and storm drains),
 - (b) Stopping spill source (e.g., closing valves, uprighting container(s)),
 - (c) Containing the spill (e.g., berms, sorbents),
 - (d) Eliminating possible ignition sources for flammable material spills (e.g., turn power off, no smoking), and
 - (e) Recovery of spilled material or contaminated soil.
- (3) Workers in the area may clean up the spill if the following conditions exist:
 - (a) The workers have sufficient knowledge of the chemicals released, the personal protective equipment and supplies necessary to cleanup the spill,
 - (b) The Fire and Emergency Services has determined that it is safe for the workers in the area to clean up the spill and has authorized the cleanup, and
 - (c) The FGA Environmental Coordinator, or designee, has been notified and provides spill coordination and material disposal support.
- (4) A standard protocol for responding to discoveries of potential contamination of unknown origin is provided in (Attachment 3).

d. Response Actions

- (1) All spills will be responded to and, to the extent possible, cleaned up within 24 hours of the spill event. FGAENV must be notified by the responder if the spill cleanup will take longer than 24 hours. Spill responses involving excavations that would otherwise require an Excavation Clearance may proceed based upon verbal approval from the Director of Public Works.
- (2) The Fire and Emergency Services will make an initial assessment of the spill, either by phone during the initial notification or by responding to the spill. If the incident can be safely controlled and cleaned up by the personnel in the immediate release area responsible for the spill, the Fire and Emergency Services will complete its notification procedure and allow the responsible personnel to clean the spill under the direction of the FGA Environmental Coordinator.
- (3) For releases/spills requiring initial responses actions by the Fire and Emergency Services, the Fire and Emergency Services will:

- (a) Perform initial site assessment and, as necessary, request support from the FGA Environmental, Safety Office or others within the Incident Command Structure.
- (b) Determine the level of health and safety risk to response personnel, workers and surrounding population and, as necessary, contact base police for evacuation and site security support.
- (c) Prepare a Site Safety Plan to evaluate hazards and to establish safe work practices, level of personal protective equipment, and other control procedures. Sections of the Fire and Emergency Services Manual of Operations may be used for the Site Safety Plan as long as they cover the specific conditions of the spill.
- (d) Ensure personnel are briefed at the scene on the Site Safety Plan prior to entry into the spill scene for reportable emergency events.
- (e) Test the atmosphere for oxygen content, flammability, and toxic materials using a vapor detector or other instrumentation, as necessary.
- (f) Establish the preliminary spill response strategy for the incident.
- (g) Notify Public Works if heavy equipment is needed to control and contain the spill.
- (h) Follow additional response requirements of the Spill Prevention and Response Plan.
- (i) When the initial response is complete and the site conditions are controlled the Fire and Emergency Services Incident Commander may complete the cleanup or turn over the control of the cleanup action to the FGA Environmental Coordinator, or qualified designee, for completion.

5. Surveillance

Medical monitoring is required for workers who may be exposed to hazardous substances at or above the permissible exposure limit and workers whose duties require them to wear a respirator.

- a. Medical monitoring examinations will be consistent with 29 CFR 1910.120(f).
- b. An examination is required prior to assignment, annually, and at the termination of employment or reassignment.
- c. FGA Fire and Emergency personnel will follow the NFPA Medical Monitoring and Medical Examinations Program for Hazardous Materials Technician (NFPA 1582).

6. Record Keeping

- a. FGA Fire and Emergency Services will maintain:

- (1) Records of all spill notifications,
- (2) A log of all response actions
- (3) Maintain Fire and Emergency Services personnel training records, and
- (4) Maintain Fire and Emergency Services personnel medical monitoring and surveillance records through the Ft. Wainwright MEDAC for a period of at least 30 years following employment termination.

b. FGAENV will maintain:

- (1) Written spill reports (initial, interim, final), sampling plans, and sample results
- (2) Copies of training records, documentation of spill drills, and
- (3) Spill event histories

c. The FGA Directorate or Tenant Unit/Contractor employing responders or exposed personnel will maintain medical monitoring records for a period of at least 30 years following employment termination of each employee engaged in hazardous materials response activities.

7. Reporting

- a. Any person that discovers a spill or discovers any contamination must immediately report the discovery to the Ft. Greely Fire and Emergency Services at (907) 873-3473.
- b. The FGA Fire and Emergency Services will make initial reports to the FGAENV and the Alaska Operations Support Center (AOSC) according to the Spill Response Call Tree (Attachment 1).
- c. The AOSC may contact the FGAENV if there are security issues that must be addressed for spills on the Missile Defense Complex (MDC).
- d. FGAENV will make verbal and written spill reports to ADEC as follows:
 - (1) Spills of petroleum products or antifreeze outside an impermeable secondary containment structure of between one and ten gallons will be reported in a monthly summary.
 - (2) Spills of petroleum products or antifreeze outside an impermeable secondary containment structure of between ten and 55 gallons will be reported within 48 hours.
 - (3) Spills of petroleum products or antifreeze outside an impermeable secondary containment structure greater than 55 gallons will be reported immediately.

- (4) Spills of petroleum products or antifreeze inside an impermeable secondary containment structure of more than 55 gallons will be reported within 48 hours of discovery.
 - (5) Any spill of a hazardous material will be reported immediately.
 - (6) Any spill of a petroleum product or antifreeze directly or indirectly to a water body will be reported immediately.
 - (7) Any discovery of contamination, or suspected contamination, of unknown origin will be reported immediately.
- e. At its discretion, depending on the significance of the event, FGAENV will make verbal reports to IMCOM Pacific ((808) 438-9333) for any spill requiring immediate reporting to ADEC.
 - f. For all spills exceeding the Federal reportable quantity, in addition to the organization listed above, the following organizations will be notified within 24 hours of the release:
 - (1) AEC, (410)-671-1223
 - (2) Army Operations Center, (703)-693-3521
 - (3) NRC, (800)-424-8802
 - g. On a case-by-case and as necessary basis, FGAENV will make interim progress reports and related submittals to ADEC. These may include sampling plans, sample results, and cleanup strategies. FGAENV will consult with ADEC on cleanup methodology and cleanup standards for significant spills.
 - h. FGAENV will submit a final written report (Attachment 2) for all reportable spills, except those reported in monthly summaries, to the ADEC within 15 days after cleanup has been completed. The report will contain the following information:
 - (1) Date and time of discharge,
 - (2) Location of discharge,
 - (3) Name of the facility,
 - (4) Person or persons causing or responsible for discharge,
 - (5) Types and amounts of discharged substance;
 - (6) Causes of discharge,

- (7) Environmental damage caused by discharge,
 - (8) Cleanup actions undertaken,
 - (9) Estimated amount of spilled material cleaned up,
 - (10) Date, location and method of disposal,
 - (11) Actions being taken to prevent the recurrence of the discharge, and
 - (12) Other information the ADEC requires to fully assess the cause and impact of the discharge.
- i. In addition to the reports required above and for spills that the Fire and Emergency Services does not respond to, the spill responder shall submit a final spill report to FGAENV within 12 hours of completing the spill cleanup.

8. Training

- a. Tenants and contractors will train all employees and sub-contractors on spill recognition, notification and initial response activities that are required by this procedure.
- b. Personnel responsible for responding to hazardous materials spills outside their own work area must attend a Hazardous Waste Operations and Emergency Response (HAZWOPER) course, as outlined in 29 CFR 1910.120, prior to any response activities.
- c. Personnel responsible for responding to hazardous materials spills outside their own work area will attend an annual HAZWOPER refresher course.
- d. All personnel authorized to act as Incident Commander will attend an OSHA Incident Commander course prior to conducting response activities.
- e. The FGAENV will coordinate an annual spill response training exercise to test the effectiveness of the FGA Spill Prevention and Response Plan, this procedure, response personnel, and equipment.

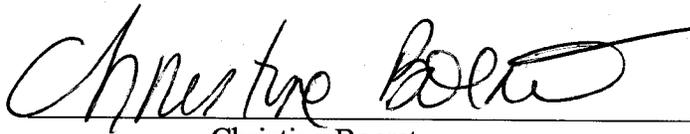
9. References

- a. Oil Discharge Prevention and Contingency Plan, FGA Alaska, April 2002
- b. Article 4, 18 AAC 75, Oil and Hazardous Substances Pollution Control Regulations
- c. 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response
- d. 40 CFR 117, Determination of Reportable Quantities for Hazardous Substances
- e. 40 CFR Part 302, Designation, Reportable Quantities, and Notification

- f. 49 CFR Parts 100 - 177, Subchapter C, Hazardous Materials Regulations
- g. AR 200-1, Environmental Protection and Enhancement
- h. NFPA 472, Standard for Professional Competence of responders to Hazardous Materials Incidents, 2002 Edition
- i. NFPA 1582, Standards for Comprehensive Occupational Medical Program for Fire Departments

10. Approval

This procedure (Chapter 5 – Spill Notification and Response Procedure) is hereby approved. All previous versions of this procedure are superseded and are longer in effect.



Christine Boerst
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Directorate of Public Works

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Date