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| Title | ES-301-5.02 Spill Response |
| Document Owner: | Director of Environmental Programs |
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1) Activity Description:

The activity of making correct notifications and the application of resources to detect, contain, control, and manage spilled material. Eliminate or minimize the discharge of pollutants to sewers and stormwater drainages resulting from material spills. Mitigate potential impacts by responding quickly with trained personnel and appropriate materials.

2) Potential Environmental Risks

- A. The following environmental concerns are associated with these activities:
 - i) Improper or inappropriate disposal of used spill response media
 - ii) Air emissions
 - iii) Odors
 - iv) Contamination of soil
 - v) Contamination of surface water
 - vi) Contamination of groundwater

- B. Potential consequences from performing the activity incorrectly:
 - i) Property damage, personal injury, or damage to the environment
 - ii) Noncompliance, Notices of Violation from regulators, and related [financial & non-financial] penalties

3) Critical Operating Requirements

- A. General Considerations
 - i) Immediately notify the DEN Communications Center (303-342-4200) of any spill**
 - ii) Each operator (City employee, tenant, contractor, vendor, etc.) conducting any activity that could result in a spill or discharge of pollutants is responsible for understanding the applicable regulations and managing their activities accordingly; this Environmental Guideline is meant as guidance only and does not supersede any regulations.
 - iii) Each operator is responsible for implementing engineering controls and practices for preventing, containing, and controlling spills and releases.
 - iv) Each operator is responsible for detecting, initial notification (DEN Communications Center), and responding to spills and leaks as rapidly and safely as possible.
 - v) Each operator is responsible for determining the appropriate notifications to regulatory agencies and for making these notifications. The ES section is available to assist the operator in evaluating the need to make notifications; however, it is the responsibility of the operator to make all appropriate notifications.
 - vi) Assess site for safety; protect personnel if material is unknown or known to be dangerous. As personnel safety allows, contain and control spill as soon as it is deemed safe to do so.

- B. Training Requirements
 - i) Personnel involved in activities that have a reasonable potential to result in a spill or release should be trained in proper management and spill reporting procedures.
 - ii) Personnel that respond to spills and/or releases must be trained in proper management and spill reporting procedures.

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- iii) Annual stormwater pollution prevention training shall inform personnel at all levels of responsibility who are involved in industrial activities that may impact stormwater runoff. Stormwater training shall address topics such as spill response, good housekeeping, and material management practices. Contractor or temporary personnel shall be informed of plant operation and design features in order to prevent discharges or spills from occurring.
- iv) Personnel involved with fueling activities for systems regulated under 40 CFR Part 112 shall be trained pursuant to the requirements identified in the site's Spill Prevention, Control, and Countermeasure (SPCC) Plan prior to conducting any fueling activities. See Environmental Guideline ES 301-1.01 Fueling Aircraft, Vehicles, and Auxiliary Equipment.

C. Storage and Materials Management Requirements

- i) Spill response materials should be stored in areas where spills are probable, such as product or waste storage, or fueling or maintenance areas
- ii) Spill response materials should be stored in accessible containers with proper signage
- iii) Ensure that spill kits contain appropriate resource materials (e.g., containment booms, granular absorbent, disposal bags, drain cover mats, brooms, shovels, and personal protective equipment)
- iv) Containment for spill cleanup debris should be made available to all employees that would assist in a response action

4) Planning Requirements

- A. Develop site-specific spill response procedures or plans to address the prevention, control, and countermeasures for spills, leaks, or discharges of substances that can impact the environment
 - i) Train all employees on basic knowledge of spill control procedures
 - ii) Key personnel should receive formal training in plan execution with additional training to first responder level (29 CFR 1910.120) as required
 - iii) For SPCC-regulated facilities/activities, provide training to all appropriate employees pursuant to 40 CFR Part 112
- B. Facilities should also evaluate the need for signage on a case-by-case basis for identifying response procedures, spill notification phone numbers, locations of spill cleanup materials, etc.

5) Critical Tasks

- A. Identify the spilled material and potential media impacts. In a safe manner, take appropriate actions to mitigate, stop, and/or control the spill to prevent impacts to soil or water (e.g., drains, inlets, waterways, sewers).
- B. Notify DEN Communications Center immediately at 303-342-4200. Provide the following information:
 - i) Material and amount spilled
 - ii) Location and threat to drains and/or soils
 - iii) Containment or response needs and cleanup progress
- C. Control and collect spilled materials using appropriate materials from the spill kit. Spills of any kind and spill cleanup materials shall not be washed into any sewer system or waterway, or onto any soils.
- D. Properly contain and dispose of used spill containment and cleanup materials. Refer to ES-301-6.01 through 6.06 for guidance on waste management.

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- E. Spill cleanup materials must be collected immediately in order to avoid any potential stormwater contamination issues.
- F. Provide proper spill notifications to regulators in coordination with DEN Environmental Services.

6) Emergency Response

- A. Notify DEN Communications Center immediately at 303-342-4200
- B. This is the emergency response guideline. In the event of a catastrophic event, make the required notification to DEN Communications Center and act to minimize imminent danger to human health and the environment

7) Inspection and Maintenance Requirements

- A. Facilities Maintenance will conduct incinerator inspections and maintenance in accordance with the state air quality O&M Plan and the solid waste CD.

8) Expected Records and Outputs

- A. Operations Incident Electronic Log Entry
 - i) These forms will be completed and maintained on file by DEN Operations
- B. Disposal profile, LDR, manifests & shipping forms
 - i) Manifests and other forms can be obtained from the disposal facility or disposal contractor/broker
 - ii) All manifests should be maintained on file by the operator for at least three years
- C. Operations Spill/Release Report
 - i) Send all relevant information to DEN ES for filing
- D. Evidence of training
 - i) While formal certifications are not always necessary, some form of “proof of training” (such as sign-in sheets and handouts) is expected and should be maintained on file by the operator

9) References

- A. Phone Numbers
 - i) DEN Communications Center (for spill reporting) (303) 342-4200
 - ii) DEN Environmental Services (Main Line) (303) 342-2730
 - iii) Craig Schillinger (DEN Environmental Services) (303) 342-2834
 - iv) Keith Pass (DEN Industrial Stormwater Permit Manager) (303) 342-2689
- B. Guidance Materials (list is not limited to the following)
 - i) NIOSH Pocket Guide to Chemical Hazards (NPG)
 - ii) DOT Emergency Response Guidebook
 - iii) EPA Office of Solid Waste and Emergency Response guidance
 - iv) OSHA Emergency Preparedness and Response guidance
 - v) DEN Stormwater Management Plan (SWMP)
 - vi) Operator SWMP
 - vii) DEN SPCC Plan
 - viii) CDPS permits (DEN’s and Operator’s)

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- ix) APCD permits
 - x) Operator's SPCC Plan
 - xi) DEN Manager's Bulletins
 - xii) Colorado Water Quality Control Division "Guidance for Reporting Spills under the Colorado Water Quality Control Act and Colorado Discharge Permits"
- C. Training Materials (list is not limited to the following)
- i) 29 CFR 1910.120 (OSHA requirements)
 - ii) 40 CFR Part 112 (SPCC requirements)
- D. Related Environmental Documents (list is not limited to the following)
- i) ES-306-1.03 Notification Handbook for Spills and Releases to the Environment
 - ii) ES-301-6.01 General Waste Management
- E. Applicable Regulations (list is not limited to the following)
- i) 40 CFR 110.3 Discharge of Oil
 - ii) 40 CFR 112 Oil Pollution Prevention (SPCC/FR Plan)
 - iii) 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
 - iv) 40 CFR 122-124 NPDES Regulations for Storm Water Discharges
 - v) 40 CFR 260-282 Federal RCRA Regulations
 - vi) 5 CCR 1001-3 through -23 State Air Pollution Regulations
 - vii) 6 CCR 1007-3, Part 261 State RCRA Regulations
 - viii) Colorado Water Quality Control Act
 - ix) CDPHE Water Quality Control Commission Regulation No. 61, Colorado Discharge Permit System Regulations
 - x) Denver Wastewater Management Division Rules and Regulations
 - xi) Metro Wastewater Reclamation District Rules and Regulations
 - xii) DEN Rules and Regulations
- F. Other Documents (list is not limited to the following)
- i) Disposal Manifest
 - ii) Maintenance Control Center Standard Operating Procedure 60-05 HAZMAT and Non-HAZMAT Spills and Releases
 - iii) Communications Center Standard Operating Procedure 80-05 HAZMAT and Non-HAZMAT Spills and Releases

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