

## Chapter 9. Spill Response, Reporting, and Prevention Procedures

### References:

- 40 CFR Part 262 (hazardous waste standards)
- 40 CFR Part 265, Subpart D (contingency plans and emergency procedures)
- 40 CFR Part 302 (hazardous substance spill reportable quantities and notification)
- OAC 3745-52 (hazardous waste generator standards)
- OAC 3745-65-50 (contingency plans and emergency procedures)
- OAC 3745-65-51 (contingency plan implementation)
- OAC 3745-65-52 (contingency plan contents)
- OAC 3745-65-53 (contingency plan recipients)
- OAC 3745-65-54 (contingency plan amendment requirements)
- OAC 3645-65-55 (emergency coordinator requirements)
- OAC 3645-65-56 (emergency procedures)
- AR200-1, *Environmental Protection and Enhancement*, Chapter 11 (hazardous substances spills)
- Executive Order 13693, *Planning for Federal Sustainability in the Next Decade* (energy efficiency and waste minimization)

This chapter provides information on how to conduct spill procedures as outlined below:

### Topics covered in this chapter include:

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**Note:** Some OHARNG facilities have a Spill Prevention Control and Countermeasure Plan (SPCCP). This plan describes the steps necessary to respond to a spill. The spill procedures described in this chapter only apply to facilities without an SPCCP.

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## 9.1 Spill Response Equipment

At a minimum, units/facilities will maintain the following spill-response equipment on-site. They can use items from existing stock and/or request items through regular supply channels.

- Removable head drum (NSN 8110-00-082-2626 or 8110-00-292-8121)
- Non-spark shovel and other cleanup equipment
- Open-head overpack/salvage drum
- Baking soda for battery acid spills
- Metal or plastic funnels
- 55-gallon drums with bungs, and other containers in sizes appropriate to the amount HM/HW being stored/generated
- Extra bungs
- Flammable storage grounding rod and cable with clips for funnel or safety can
- Drum covers
- Signs (NO SMOKING, IN USE (For drums being filled), and HAZARDOUS WASTE STORAGE AREA – UNAUTHORIZED PERSONNEL KEEP OUT (for waste storage))
- Hazard Placards
- Impervious rubber gloves, apron, and splash shield
- Paint for masking, stenciling, and labeling
- Appropriate DOT and HW labels, if required, and permanent marking pens
- Caustic soda for acid neutralization
- pH paper

- Absorbent pads, absorbent socks/booms, and absorbent (e.g. speedy dry)
- Plastic bags
- Sand bags
- Squeegee

## 9.2 Spill Response and Reporting Procedures

Facility that generate HW are required to have a HW contingency plan that addresses emergency spill response procedures. The HW contingency plan is designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste.

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**Note:** Units do not generate or transport hazardous waste. Units transport and turn-in excess or obsolete HM to supporting maintenance facilities. Trained personnel at the maintenance facilities make the determination if the excess or obsolete HM are HW.

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Facilities that store or transport hazardous substances (HM and POL) are also required to have contingency plans that address emergency spill response procedures. For facilities that have an SPCCP, the SPCCP serves as the contingency plan. SPCCPs are designed to address HW, HM, and POL emergency response procedures. For all facilities that do not have an SPCCP and generate HW or store or transport HM or POL, AGOH Form 200-1-6-R, Emergency Spill Response Procedures (see Appendix C) serves as the required contingency plan. Facilities that do not have an SPCCP must follow the guidelines outlined on AGOH Form 200-1-6-R, Emergency Spill Response Procedures (see Appendix C). The Emergency Spill Response Procedures form and the Spill Incident Report form, AGOH Form 200-1-7-R (see Appendix C) must be posted on the bulletin board, at all refueling points, in all vehicles transporting POL or HM, and in the convoy commander's vehicle. The steps described on the Emergency Spill Response Form are explained below:

**Step 1.** Designate an On-Scene Coordinator (OSC).

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**Note:** RCRA requires that each facility appoint as an Emergency Coordinator(s) an employee who is either on the facility premises or on call and can reach the facility quickly. This Emergency Coordinator, also known as the On-Scene Coordinator (OSC), is responsible for coordinating all emergency response measures (see Chapter 1).

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**Step 2.** POL, HM, or HW spills, fires, or explosions, must be reported immediately to the OSC by the first person to observe or discover the incident.

**Step 3.** The OSC must notify the Joint Operations Center (JOC) immediately at **1-888-637-9035** unless the spill occurs at the Camp Ravenna Joint Military Training Center (CRJMTC) or the Camp Perry Joint Training Center (CPJTC). At CRMTC and CPJTC notify Range Control. Range Control will coordinate with unit and make the required notifications to the JOC and the Environmental Office. OSCs at all other locations must follow up the phone call to the JOC with a phone call to the Environmental Office at **(614) 336-7095** (Environmental Program Manager), **(614) 336-7395** (State Environmental Supervisor), or **(614) 336-6568** (Fort Ohio Environmental Supervisor).

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**Note:** Spills of hazardous substances and POL spills over 25 gallons or that leave a visible sheen on the surface of the water must be reported within 30 minutes to the Ohio EPA Emergency Response Section and, depending on the hazardous substance, to the National Response Center. Failure to report these spills within 30 minutes could result in enforcement action and fines. OSCs must always notify the Environmental Office within 24 hours of all spills, regardless of the type or the amount of the spill. If the spill is a threat to human health or safety call 911, notify the Ohio State Highway Patrol (by District) and/or the local Fire Department.

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**Step 4.** Identify the spilled substance and evaluate the hazard.

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**WARNING:** Resist the urge to rush in. Do not become an accident statistic or part of the problem. If in doubt, stay out.

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**Step 5.** Secure the scene. Set up an adequate perimeter to assure the safety of bystanders. Limit access to the spill.

**Step 6.** Contain the spill and stop its source (if possible). The source may be stopped by:

- Set containers upright or roll them over so the hole is facing up.
- Close valves and turn off power to pumps.
- Place leaking drums in compatible DOT-approved overpack drums.
- Transfer material in a leaking container to another container.
- Patch holes.
- Move the container to a location where it poses less of a threat.

**WARNING:** **DO NOT** take any unnecessary risks that place you, other responders, or bystanders at risk! Always enter the spill area upwind, uphill, or upstream. Use the appropriate personal protective equipment (PPE). Prevent spills from flowing into drainage ditches, storm and sewer drains, and bodies of water. Earthen dams and sandbags are effective for this purpose. Aside from ensuring human health and safety, the highest priority is preventing the spill from entering state's waters/waters of the U.S. *by any means possible*.

**Step 7.** Refer to DOT's *Emergency Response Guidebook*, if available.

**WARNING:** Turn off all sources of ignition (pumps, motors, etc.). Do not allow matches, lighters, smoking, vehicles, or any sparking machines into the spill area.

**Step 8.** OSCs must complete a Spill Report (see Appendix C). Send the completed form to the Environmental Office and retain a copy in the spill section of the HW/HM Binder.

### 9.3 Spill Prevention

Most spills in the OHARNG do not result from catastrophic equipment failure or a blatant disregard for environmental rules and regulations. Most spills in the OHARNG result when soldiers do not pay attention to detail or fail to follow established protocols due to time constraints. Here are some basic rules to follow to prevent unnecessary and expensive spills:

- Conduct routine inspections of HM and HW storage areas as outlined in Chapter 8
- Turn in rusted, bulging, dented or leaking HM containers
- Conduct routine inspections of motor vehicle storage compounds as outlined in Chapter 8
- Ensure a strong preventative maintenance program is in place which addresses inspecting all vehicles and equipment in the unit's motor vehicle storage compound for conditions that could lead to leaks or spills of POL or other HM.
- Promptly submit work orders schedule repairs for equipment and vehicles with Class 2 or Class 3 leaks (see Section 9.4)
- Contain Class 2 and Class 3 leaks with drip pans until the equipment or vehicle can be repaired
- Know where spill kits are located and how to use them

- Use appropriately sized secondary containment

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**Note:** Secondary containment systems must have sufficient capacity to contain 10% of the volume of all stored containers or 100% of the volume of largest container, whichever is greater. Placing a 5-gallon POL container on top of a 55-gallon drum stored in a secondary containment system designed for a 55-gallon drum defeats the purpose of the secondary containment system.

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- Incorporate spill response and prevention into the risk management process
- Incorporate spill prevention planning on Deliberate risk Assessment Worksheets (DRAW), DD Form 2977, prior to the execution of training operations, to include convoy and fueling operations

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**Note:** Spill incidents can be significant threats to human health and safety. Considering spill response and prevention when conducting risk analysis is mandatory and should be second nature to OHARNG soldiers. At a minimum everyone involved in the mission should know where fuel and POL assets are located, when and how to deploy secondary containment, where spill kits are located and how to use them, who to call in the event of a spill (JOC, Environmental Office, 911, etc.) and who is in charge in the event of a spill (OSC). Conducting spill response and prevention briefings during convoy operations are especially important. Mobile fuel assets and fuel points are especially vulnerable to accidents and spills.

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- Replace unserviceable secondary containment
- Unless otherwise specified in writing by a Battalion Commander, mobile fuel tanks must be filled from the bottom up to reduce the risk of catastrophic equipment failure during commercial refueling operations
- Deploy secondary containment properly

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**Note:** Deploy secondary containment on level surfaces. Deploying secondary containment on a slope decreases the storage capacity. Letting the containment system fill with rainwater also decreases the storage capacity. Placing bricks, tires, etc., on the sidewalls of portable secondary containment to keep it from filling with rainwater defeats the purpose of the secondary containment system. If the secondary containment system fills with rainwater **DO NOT** release rainwater from any secondary containment system without consulting the Environmental Office or Range Control first! Letting any part of the mobile fuel tanker hang over the portable secondary containment system is also unacceptable. Secondary containment must be placed under the nozzle during fueling operations.

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- Do not use POL trucks or trailers to store bulk or excess POL between drill weekends or annual training periods

**Note:** Use racks, cages, etc. to store and secure POL when the POL truck or trailer is in motion. Stacking POL containers increases the risk of damaging the container. Unsecured containers can shift while the truck or trailer is in motion, damaging containers and increasing the likelihood of a spill. POL trailers do not come equipped with secondary containment. Any product spilled in the trailer will leak out onto the ground or highway. Secondary containment systems are available and can be purchased for POL trailers. Contact the Environmental Office for more information.

## 9.4 Class 2 and 3 Equipment and Vehicle Leaks

Class 2 and 3 leaks are responsible for most of the POL stains in motor vehicle storage compounds. A Class 2 leak forms a drip. A Class 3 leak forms a drip that drops to the ground. Class 2 and 3 leaks lead to reportable spills if they are not addressed as soon as they are discovered. All vehicles and equipment with Class 2 or Class 3 leaks must use a drip pan to contain the leak until the vehicle or equipment can be repaired. Unless otherwise specified by an SPCCP or other local regulation, **there is no legal requirement for non-leaking equipment and vehicles to have drip pans.** If you have military vehicles and equipment parked/stored at your location, you are required to have drip pans on hand to handle any Class 2 or 3 leaks that may occur. You aren't required to deploy the drip pans unless you observe a leak.

### Authorized Drip Pans

Figure 9-1 shows different types of drip pans authorized for use. **Only use the large black rubber drain pans used for draining fluids from equipment as a last resort!** Water accumulates in these drain pans, creating a spill incident when they overflow or are overturned. Authorized drip pans have weighted bottoms to keep them from blowing away or tipping over. The drip pans usually employ weep holes or wire mesh to prevent water from accumulating in the pan. The drip pans contain an oil only absorbent that allows water to pass through the pan.

**Figure 9-1. Examples of Authorized Drip Pans\***



**\*Note:** The products pictured above are examples only. Equivalent products are authorized.

## Use of Drip Pans

Change out the absorbents when they become saturated with product. Saturated absorbents must be placed in a trash bag, labeled, and turned in to the supporting maintenance facility for proper disposal. If a drip pan should happen to fill with water, **DO NOT** dump it out in the parking lot. **DO NOT** dump the oily water down any drain! **DO NOT** dump the contaminated water into a used oil container. Remove as much oily sheen from the water as you can using oil only absorbents pads. The pads can be thrown in the trash as long as they aren't saturated with product, i.e. you can't wring any product out with your hands. Place the non-saturated absorbent pads in a trash bag and seal the bag before placing it in the dumpster. Saturated pads must be placed in a trash bag, labeled, and turned in to the supporting maintenance facility for proper disposal. The water can be dumped into a wash rack's OWS once the sheen is gone. If the sheen cannot be removed the water needs to be containerized and turned in to the unit's supporting maintenance facility for proper disposal. Contact the Environmental Office if further assistance is required.

## 9.5 Resources

### Secondary Containment and Spill Response Equipment

**Step 1. Contact the Environmental Office.** The Environmental Office may have what you need on-hand or have access to excess secondary containment (berms, plugs, etc.) or spill response equipment (spill kits, absorbents, etc.). If the assets are not readily available, the Environmental Office can assist you with specifications for the purchase of secondary containment and spill response equipment.

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**Note:** The Environmental Office will work with state maintenance repair workers to obtain secondary containment and spill response equipment through the AQG's state property manager.

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**Step 2. Coordinate purchase through DCSLOG-LMO.** Contact the DCSLOG-LMO to determine proper procurement procedures. DCSLOG-LMO may authorize the use of a Government Purchase Card (GPC) for the purchase. If DCSLOG-LMO does not authorize the use of the GPC for the purchase, a purchase request will be required. All purchase requests must be approved by DCSLOG-LMO. Units must submit purchase requests through the Battalion S4. AASFs must submit purchase requests through the SAO. FMSs, the CSMS, and the UTES must submit purchase requests through the SMO. The Warehouse must submit purchase requests through the USPFO.