EMERGENCY PLAN FOR HAZARDOUS SPILLS

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13.1 Purpose of Emergency Plan

This Emergency Plan is designed to minimize exposure hazards to our employees, the general population, and the environment from any release of hazardous materials.

Spill response personnel training requirements focus on the knowledge and skills to manage spills safely and effectively, including hazardous materials. Training often includes understanding spill hazards, using personal protective equipment (PPE), implementing containment and cleanup procedures, and reporting requirements. Specific regulations like OSHA's HAZWOPER standard (29CFR1910.120) mandate certain training levels and frequencies.

Many workers have been injured attempting to clean a spill and exposed themselves to harmful chemicals. It is imperative that spill responders be trained in the proper remediation procedures so as not to create a greater hazard to them or the environment.[1]

Elements of Spill Response Training should include:

Hazard Identification:
Understanding the risks associated with different spilled materials, including their chemical properties and potential hazards.

Personal Protective Equipment (PPE):
Proper selection, donning, doffing, and use of appropriate PPE to minimize exposure to hazardous substances.

Spill Containment and Control:
Techniques for containing spills, preventing further spread, and mitigating potential environmental damage.

Cleanup Procedures:
Methods for safely cleaning up spills, including material handling, waste disposal, and decontamination procedures.

Emergency Procedures:
Knowledge of emergency shutdown procedures, first aid, and how to activate emergency response protocols.

13.2 Emergency Procedures

All employees designated as in-house spill responders who manage chemicals or hazardous waste shall be informed of the following emergency procedure:

[1] During a cleanup at a restaurant, an accidental mix of cleaners — acid (Scale Clean) and bleach — generated toxic fumes that killed the manager and injured 13 others in a facility in Massachusetts.

1. Responders should determine the risks that may affect human health, the environment and property. The spilled material can be identified from the container label or the Safety Data Sheet (SDS) (see 13.5 below).
2. Select personal protective equipment (PPE)
3. Evacuate non-essential personnel.
4. Stop the release at the source, if possible,
5. Contain the release (spill or leak). Create a berm around the waste material using absorbent material.
6. Contact the Emergency Coordinator. Notify security office. Request the Emergency Coordinator to come immediately to the area.
7. The site, personnel, and equipment should be decontaminated by removing or neutralizing the hazardous materials that have accumulated during the spill. This may involve removing and disposing of contaminated media, such as soil, which was exposed during the spill incident. PPE may be able to be reused after inspection and cleanup. An effective decontamination area should also be created to ensure the health and safety of emergency responders.

The Emergency Coordinator will arrive at the scene immediately and determine the extent of the emergency. The Emergency Coordinator will then take the following actions. Unnecessary people will be kept away from the area.

13.3 Inside Release Emergency Action

1. DO NOT TOUCH RELEASED MATERIAL WITHOUT RUBBER or NITRLE GLOVES. Rubber gloves and absorbent material are in the Spill Kit.

2. Stop the release if possible. If the release is caused by a hole in the container, stuff a rag into the hole. Rags are in the Spill Kit.

3. Dike the area around the release to prevent material from spreading or reaching any drains. Absorbent to use for the dike is in the spill kit.

5. Spread absorbent material on the release. Allow absorbent to soak up released material.

6. Transfer remaining non-released material into a clean empty container.

7. Sweep absorbent material into a clean container for off-site disposal at an EPA approved secure landfill. All rags used for clean-up should also be placed in this container.

8. Scrub the area of the release with detergent and water. Clean-up water is to be collected in a container for off-site disposal at an EPA approved treatment or disposal facility. If the release has leached into the sealed concrete, steam clean the area, collecting the water as above.

9. Label all containers of release collected material with the "Hazardous Waste" label or “Spill Waste Pending Analysis.”

Arrange for off-site disposal of all containers of material resulting from the release. All material must be shipped to an EPA approved treatment, storage, or disposal site.

10. Complete a report of the release incident including:

What material was released, reason for the release, quantity of material released, clean-up procedure used and disposition of clean-up waste

13.4 Arrangements with Emergency Response Agencies

The Emergency Plan will be sent to the local Emergency Agencies. Any responses from the Agencies will be documented as Appendices to the Emergency Plan. Any future verbal communications with the Agencies will be documented in the Emergency Plan to keep all responses up to date.

Attached **Exhibit "A"** is the cover letter to be sent to the Emergency Agencies with a copy of the Emergency Plan. We are also requesting that each agency sign a Certification of Receipt of Emergency Plan so that we can be certain that each agency is aware of the hazardous waste managed by the facility.

13.5 Safety Data Sheets

Safety Data Sheets (SDS) are available. **Section 6** of a Safety Data Sheet (SDS) provides detailed guidance for responding to spills, leaks, and other releases of a hazardous chemical. The section of an SDS dealing with first aid is **Section 4: First-Aid Measures**. This section provides essential information on the initial care to give in case of chemical exposure, including descriptions of symptoms and effects (both acute and delayed), first aid instructions for different routes of exposure (inhalation, skin/eye contact, and ingestion), and recommendations for immediate medical care or special treatment if needed.

SDS can be accessed through Fieldwire link or QR code on the container.

13.6 Emergency Equipment

Attached **Exhibit "B"** is a list of Emergency Equipment which would be required if any hazardous waste were released.

As new equipment is purchased or old equipment is replaced or the location is changed, the Emergency Equipment list is updated.

13.7 Duties of Emergency Coordinator

1. Arrive at the scene of the release immediately.
2. Direct EMERGENCY RELEASE CONTROL ACTION
3. Determine extent of emergency. If the release can be easily contained and cleaned up without possibility of damage to health or the environment, then this release can be classified as an incidental release and no evacuation or notification to agencies is required.
4. Stop the spill from contact with floor drains. Floor drains may discharge to the ground (soil) or to a nearby surface water causing a larger environmental impact.
   If the release of hazardous waste could threaten health and/or the environment or the release cannot be contained or cleaned up without threat to human health or the environment, then the Emergency Coordinator must activate the Evacuation Plan.
5. The Emergency Coordinator must use his best judgment as to which agencies can best respond to the emergency. Since some of the hazardous waste is/may be flammable, the fire department (911) would be contacted first.

   Emergency telephone numbers are listed on the first page of the Emergency Plan

EXHIBIT B

13.8 Emergency Equipment

EQUIPMENT	QUANTITY	LOCATION	DESCRIPTION OF CAPABILITIES
Absorbent	4 - 25# bags	Storeroom	Absorbs spills, dike around spills, dike around drains.
Rubber Gloves (elbow length, acid resistant)	2 pair	Storeroom	Protect hands/arms from contact with hazardous waste
Plastic Aprons	3	Storeroom	Used to protect employees' clothing against contact of hazardous waste or materials.
Pump (hand pump)	1	Storeroom	Used to pump material into drums if spilled.
Shovels	1	Storeroom	Used to shovel up used absorbent during clean-up.
Broom	1	Storeroom	Used to sweep up absorbent material during clean-up.
Face Mask	2	Storeroom	Used to protect employee's face and eyes from splash of hazardous waste.
Respirators	2	Storeroom	To be used if spill of acid or extreme vapors to prevent employees from inhaling toxic vapors
Respirator Cartridges	4	Storeroom	Verify the correct cartridges for the chemical release.
Communication System	1	Facility	Paging system throughout facility.
Mops	1	Storeroom	It is used to mop up small leaks or spills.

Emergency Plan for Hazardous Spills
NAME OF FACILITY:
MAILING ADDRESS:
TELEPHONE NO:
FACILITY MANAGER
OPERATIONS:

EPA ID NO.
Emergency Coordinators (To be contacted in order listed)

Primary Coordinator:
Alternates:

Emergency Response Contact:

Fire Department
Police Department
Hospital
STATE OFFICE OF EMERGENCY SERVICES (800) 852-7550
Types of Hazardous Waste Managed at this Facility
Description & Hazard Class:
EPA Hazard Waste No.:
Where stored:

No. of Wastes Stored on Site:

Notes: