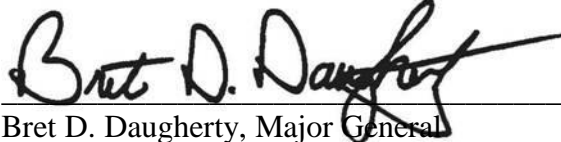


## Unified Washington Military Department and National Guard Policy No. 10-04

<b>Title</b>	Spill Response and Reporting
<b>Former Number</b>	EMS Spill Response and Reporting Procedures: 2016
<b>References</b>	Army Regulation 200-1: 2007 International Organization for Standardization (ISO) 14001:2004, revised by ISO 14001:2015
<b>Information Contact</b>	Washington Military Department Environmental Programs Office (EPO), Building #36 (253) 512-8466
<b>Effective Date</b>	January 1, 2011
<b>Mandatory Review Date</b>	June 10, 2025
<b>Revised</b>	June 10, 2021
<b>Approved by</b>	 Bret D. Daugherty, Major General The Adjutant General Washington Military Department Director

### Purpose

Establish a policy that governs the procedures for recognizing and responding to accidental or intentional spills involving Washington Military Department (WMD) personnel, activities, properties, vehicles, or facilities. The summarized actions in this policy are in accordance with federal, state, and local laws, regulations, policies, and directives.

### Scope

This policy applies to all WMD state and federal civilian employees and members of the Washington National Guard (WANG). It also applies to any contractors, vendors, and/or visitors who support the WMD.

Personnel who access or are assigned to active duty facilities, such as Joint Base Lewis-McChord (JBLM), Yakima Training Center (YTC), or Fairchild Air Force Base, are reminded that they are responsible to comply with the requirements of their respective host installation, in addition to this policy and its procedures.

### Definition

Spill or release - occurs when hazardous (dangerous) wastes, chemicals, toxics, or any other material including, but not limited to, waste such as petroleum, oil, and lubricants (POL), is intentionally or accidentally spilled or discharged into the environment (unless otherwise

permitted) such that human health or the environment is threatened to have adverse impacts. The terms spill and release can be used interchangeably, but a release is typically associated with an air emission(s).

## **Policy**

This policy outlines the response and reporting requirements for hazardous spills or releases involving WMD personnel and/or property in accordance with Army Regulation 200-1 and the Adjutant General directives. The WMD is committed to excellence, leadership, and stewardship in protecting the environment and our natural resources.

### **A. Roles and Responsibilities**

1. Environmental Program Office (EPO) Spill Coordinators are rotating team member(s) from the EPO who are responsible for coordinating agency directed emergency spill response activities, such as technical assistance during response, remediation, mitigation, and restoration. An EPO Spill Coordinator, trained in accordance with WAC 173-303-360 requirements, will be available on 24-hour stand-by status and is the initial point of contact for all spill incidents that don't require a 911 call.
2. Washington Army National Guard Joint Operations Center (JOC): is the force commander's headquarters for planning, monitoring, and guiding the execution of commander decisions. The JOC is a 24/7 response dispatcher for all incidents and will be notified of any spill by the EPO Spill Coordinator, immediately after responding to a reported incident.
3. National Response Center (NRC): The National Response Center maintains a 24/7 emergency number 800-424-8802 for spills. The EPO Spill Coordinator will contact them as legally required depending on the extent and location of the spill.
4. Responsible Party is the person, business, or entity that has been identified as causing the spill, owning the facility where the spill originated, or is the person in charge of the operation that caused the spill. The Responsible Party is the person(s) who first becomes aware of a spill or release and accountable for initiating the response procedures to prevent further adverse outcomes.
5. WA State Emergency Response Commission (SERC): Report the release of hazardous or extremely hazardous substances to the WA State Emergency Response Commission (SERC) at 800-258-5990. The EPO Spill Coordinator will contact them as legally required depending on the extent and location of the spill.
6. Unit Environmental Compliance Officers (UECOs) are appointed individuals, in accordance with Army Regulation (AR) 200-1, who ensure environmental compliance with city, state and federal regulations for their assigned facility/company. UECOs will identify resource needs, serve as the local point of contact for environmental issues, and provide information to the EPO and/or host installation for required reporting. UECOs are trained to meet the appropriate response level.

7. WA Department of Ecology (ECY) Spills Program is administered by the ECY. The ECY is the state's regulatory agency for larger oil handling facilities, pipelines, commercial vessels, mobile facilities, and railroads. The ECY Spills Program is responsible for adapting and improving spill prevention and preparedness measures to protect the state's environment, economy, the health of communities, and the health of cultural and historical resources, including spill response. They maintain regional response offices and have 24/7 response capability. The EPO Spill Coordinator will contact them as legally required depending on the extent and location of the spill.
8. WMD Emergency Management Division (EMD) 24-hour Alert & Warning Center's primary purpose is information gathering, disaster analysis, and response coordination for all types of incidents. They can be reached at 800-258-5990 or 800-OILS-911. All calls pertaining to spills received by EMD are forwarded to the ECY Spills Program.

## **B. Prevention**

Operating safely and efficiently is the best way to prevent spills. The key is to follow proper procedures for storing, transferring, handling, using hazardous (dangerous) material, and disposing of hazardous and non-hazardous waste. All personnel should be trained to recognize hazards, be aware of facility layout, available resources, and understand how to implement site-specific plans and permits. Examples of plans/permits include, but are not limited to:

1. Spill Prevention, Control, and Countermeasure (SPCC) Plans (40 CFR part 112) are required for a facility that:
  - a. Stores, transfers, uses, or consumes oil or oil products, such as diesel fuel, gasoline, lube oil, hydraulic oil, adjuvant oil, crop oil, vegetable oil or animal fat; and
  - b. Stores more than 1,320 U.S. gallons in total of all aboveground containers (only containers with 55 gallons or greater storage capacity are counted), or more than 42,000 gallons in completely buried containers; and
  - c. There is a reasonable expectation of an oil discharge into or upon navigable waters of the U.S. or adjoining shorelines, such as lakes, rivers, and streams.

If a facility has over 10,000 gallons in total oil storage capacity, a professional engineer must certify SPCC plans, which are to be filed with the Environmental Protection Agency (EPA). If the oil storage capacity of the facility is less than 10,000 gallons total, the facility can self-certify a SPCC plan that does not have to be filed with the EPA and conduct regular self-inspections to be in compliance.

2. Integrated Pest Management (IPM) Plan

The WMD utilizes an IPM Plan to achieve effective pest control with minimal environmental impacts. The IPM Plan, employs all available techniques, including cultural, physical, mechanical, biological, and chemical controls, to manage a wide range of pests and invasive species. The plan identifies personal protection, special handling, and storage requirements for chemicals, which are covered under this policy.

3. Stormwater Pollution Prevention Plan (SWP3)

An Industrial Stormwater General Permit, Construction Stormwater General Permit, and a Phase I Municipal Storm Water General Permit all require the permit holder to have and maintain a SWP3. The purpose of a SWP3 is to outline actions that will be implemented to reduce or eliminate discharges of pollutants into the surface or ground waters of the state in accordance with federal and state water quality legal requirements.

**C. Communication**

1. Initial Response

Steps to address a spill, regardless of the level of hazard involved, are demonstrated in the Spill Response Flow Chart (Attachment A). The Spill Response Flow Chart summarizes the important steps of communicating the hazard; controlling, containing, and cleaning up the spill; repairing or restoring any damage; and documenting the entire process. 911 is to be called in the event of a threat to human health and safety. All spills are to be reported to the EPO Spill Coordinator at 253-355-4634 who will then notify the JOC at 253-512-8773 immediately after responding to the incident.

The level of the hazard will determine the appropriate contacts and forms of communication during the initial response. If deemed necessary, the EPO Spill Coordinator will contact a qualified hazardous material cleanup contractor to assist with the emergency spill response. The EPO Spill Coordinator will also notify all appropriate federal, state, local and tribal agencies as necessary for reportable quantities.

2. Emergency Services Required

Call 911 if there is an immediate threat to human health and safety, or if the spill cannot be controlled and/or contained. Safety is the primary concern. After calling 911, immediately notify the EPO Spill Coordinator.

3. Internal Response

a. If a spill occurs:

- 1) Immediately warn others in the area, assess site safety, and if safe to do so, control the source of the spill.
- 2) Contain the spill to the smallest possible area; and
- 3) Report the spill to the EPO Spill Coordinator.

The EPO Spill Coordinator will provide technical assistance in spill responses. Safety is the primary concern. Only trained/qualified personnel should respond to the incident wearing the appropriate personal protective equipment (PPE). The level of PPE for the response is dependent on the type and volume of spilled material, environmental conditions, and location of the incident.

b. Exceptions to an Internal Response

- 1) Unable to respond

Do not attempt to contain the spill if personnel in the immediate area are unsure, untrained, lack the proper supplies or equipment, are otherwise unable or have been directed not to respond. If the spill is not posing an immediate threat to human health and safety, immediately notify the EPO Spill Coordinator who will provide technical assistance and can arrange to have professional spill responders deployed to the incident if needed.

2) Spill during transit (e.g., convoys)

Whatever the cause, if a spill is originating from vehicle(s) and/or cargo during transit, emergency services must be contacted. Call 911 and then immediately notify the EPO Spill Coordinator, who will provide technical assistance and notify the JOC. Safety is the primary concern. If the vehicle is drivable, pull off the road and avoid surrounding traffic. If possible, attempt to stay on impervious surfaces and do not position the spill source over gravel, soil, or storm drains. Spill kits in vehicles can be used to control or contain a spill if it is safe to do so. The local authorities will aid in traffic control (if needed) and will contact the appropriate local jurisdictions to evaluate the impact of the spill.

3) Discoveries of unknown substances and/or illicit discharges

If an unknown substance or discharge is discovered to be actively leaking and/or releasing a vapor cloud, contact emergency services. Safety is the primary concern. Call 911 and then immediately notify the EPO Spill Coordinator, who will provide technical assistance in identifying the substance and notify the JOC. Once the substance is identified, immediate action should be taken to protect human health and safety and prevent further release to the environment. If the substance or discharge is not presenting an immediate hazard or potential release to the environment, mark off the area from a distance to avoid unnecessary contact. Personnel should not attempt to mitigate an unknown substance or discharge without identification. The EPO Spill Coordinator will provide technical assistance on mitigation. Common examples:

- a) Stormwater systems displaying signs of impact from an unauthorized discharge (POLs, chemicals, etc.) may be identified through visual inspections, malfunctions, or pollutants at the discharge point.
- b) Discharges of an unknown substance(s) surrounding trash bins and/or accumulation areas for storage or waste may be present due to dumping, damage to containers or impact from elements (rainfall).
- c) Abandoned drums or containers without proper identification may be discovered as illegally dumped, improperly managed, or discarded within or adjacent to WMD property.

#### **D. Mitigation – Clean Up**

The goal of a spill mitigation is to restore the impacted area to pre-spill conditions. The EPO Spill Coordinator, and other EPO Staff, will collaborate with any affected entities, including federal, state, and local government agencies, and tribes, to assess the impact of the spill and determine necessary measures to mitigate damage and restore the environment.

## 1. Internal Mitigation

Spill kits, provided by the EPO or unit supply, are allocated to all facilities owned/operated by the WMD that store hazardous material, generate waste, or conduct daily activities and have the potential to adversely impact human health or the environment. Trained/qualified personnel, such as UECOs, may respond to spills within their immediate areas with these resources.

- a. The Responsible Party is required to ensure that any waste generated from clean-up measures is properly contained and placed in the appropriate accumulation area for disposal. The disposal of waste will be managed by the EPO Hazardous Waste Program Manager in consultation with the Responsible Party.
- b. The EPO Spill Coordinator will assist the Responsible Party in determining if mitigation efforts have successfully met pre-spill conditions. If necessary, an Environmental Specialist can be hired for consultation on the determination. If internal mitigation measures do not achieve pre-spill conditions, external mitigation may be required. The EPO Spill Coordinator will provide technical assistance on internal mitigation measures, but liability and associated funding to support the mitigation, including the disposal of waste, will be the responsibility of the Responsible Party.
- c. Facilities with the capability to conduct internal mitigation should have access to adequately stocked spill kits including appropriate PPE (e.g., eye protection, gloves, coveralls, etc.). Facilities should also have access to tools such as shovels; as well as appropriate hazardous waste containers (e.g., 55-gallon steel drums). Spill kit supplies or restocking of supplies, may be requested through the EPO.

Spill Kits include (at a minimum):

- Absorbent Socks
- Absorbent Pads/Pillows
- Loose Absorbent
- Drain Covers
- Empty 5-gallon buckets

## 2. Outsourced Mitigation

Primary response contractors or other environmental specialists may be contracted by the EPO Spill Coordinator for incidents that cannot be mitigated by internal resources to restore the environment to pre-spill conditions. The identified Responsible Party is liable for damages resulting from impacts to the environment (natural, cultural, historic) and for any expense related to outsourced mitigation measures. Mitigation efforts can include, but are not limited to, assessment of the spill, containment, cleanup, disposal of waste, sampling, remediation, and final surveys. In addition, the Responsible Party is subject to penalties and will be held accountable for all costs associated with notice of violation(s), and/or enforcement actions, by federal, state, and/or local authorities.

## E. Reporting Requirements

The person making the initial notification, is required to report all pertinent information. They must speak clearly and attempt to remain calm so that the information relayed is received accurately.

### 1. Verbal Report

Upon initial notification, if leaving a message or speaking to the EPO Spill Coordinator, first provide a name, contact number, and the general location of the spill, so that if the call is dropped and cannot be reestablished, help will still be available. The following information will be requested by the EPO Spill Coordinator:

- a. If 911 has been called, if anyone is injured, or if there is an immediate threat to human health and safety.
- b. Description of spilled material (identify specific substance or, if unknown, provide as much information as available regarding material characteristics).
- c. Estimated volume or total amount of material spilled (e.g., 5-gallons, half of a 55-gallon drum, a 300-gallon saddle tank from a semi-truck, or a 10,000-gallon storage tank).
- d. If the spill source has been controlled and the spilled material contained.
- e. Location of the spill, as specifically as possible (GPS coordinates are preferred but at a minimum, a street address and directions to the site).
- f. Description of the impacted area – including proximity to people, other hazards, and surface type (e.g., soil, gravel, asphalt, concrete, etc.).
- g. Proximity of the spill to water, and if the water source has been impacted or is believed to be at risk (e.g., storm drains, ditches, creeks, rivers, wetlands, ponds, lakes, Puget Sound, the Pacific Ocean, or any other water body – either natural or manmade)

### 2. Written Report

The EPO Spill Coordinator will start a written spill report during the initial notification call. The reporting party will be provided a copy and is required to supplement the report within 24 hours, or as soon as reasonably feasible, after the incident. Spill report forms can be obtained directly from the EPO Spill Coordinator via email, in person, from the EPO office, or downloaded from the EPO website (<https://mil.wa.gov/environmental-programs>).

Completed reports can be emailed to [env@mil.wa.gov](mailto:env@mil.wa.gov), hand delivered to the EPO Spill Coordinator, or mailed to the EPO at the following address:

36 Quartermaster Road  
Camp Murray, WA 98430-5050

The Responsible Party will coordinate with the EPO Spill Coordinator to finalize the report after mitigation has been completed, regardless of how long the process takes. A

copy of the finalized report will be provided to the Responsible Party and the JOC by the EPO Spill Coordinator. Units are also required to complete an After-Action Report and submit it with a copy of the finalized report to their Commander.

3. Report/Record Retainment

The EPO will maintain documentation, including spill reports, correspondence, and regulatory reporting, for all spill events. Electronic records will be placed in a centralized folder in SharePoint for future reference, audits, and regulatory needs. Handwritten reports will be digitized for storage. These records are to be retained for a period of six (6) years and/or according to approved record retention schedules. Records will not be destroyed by the EPO but will be forwarded to the WMD Records Officer for authorized destruction or transfer. Significant information on all spills will be entered into a searchable database for spill prevention and preparedness purposes. Internal requests for spill reports can be made through the EPO, external inquires must submit a request to the WMD Records Officer via the Washington Public Records Act.

4. EPO Spill Coordinator Reporting Requirements

The EPO Spill Coordinator will provide technical assistance to the reporting individual and will coordinate with them and/or the Responsible Party to:

- a. Assess the situation with respect to the health and safety of those present on the spill site and those that will be responding, as well as any potential environmental impacts, with special concern for waters of the state.
- b. Provide technical assistance to spill respondents (internal/external).
- c. All spills reported to the EPO Spill Coordinator will be conveyed to the JOC. This communication should be as soon as possible after the EPO Spill Coordinator has assisted the Responsible Party in appropriately responding to the incident.
- d. Help to determine the Responsible Party.
- e. Determine if the spill meets reportable quantities and contact regulators as needed (NRC, ECY, or EMD).
- f. Provide additional notifications to federal, state, and local government agencies or tribal entities as appropriate.
- g. Assist with determining appropriate mitigation measures and ensure that mitigation measures meet pre-spill conditions.
- h. Assist the Responsible Party with submitting appropriate documentation (Spill Report, After-Action Report, legal documents, etc.), in a timely manner.
- i. Manage all correspondence received by the EPO pertaining to the spill and keeping accurate records of the incident per the state's required retention policy.
- j. Coordinate with Responsible Party and the EPO Hazardous Waste Manager to arrange for the removal of hazardous waste.
- k. Assist the Responsible Party when dealing with local, state, or federal authorities regarding any fines, fees, or restoration projects that may be assessed.



1. Work with the Responsible Party to make recommendations to prevent future spills and provide recommendations on how to access additional training or resources.

## **F. Debriefing**

The Spill Report describes the incident and documents future prevention measures that will be taken to avoid a repeat of the spill. These measures can include additional training, equipment acquisition or process improvement. Once a spill has been appropriately mitigated, the Responsible Party is required to coordinate with the EPO Spill Coordinator to complete a final spill report. They should also debrief with their direct supervisor and the EPO Spill Coordinator to determine if any corrective actions need to be implemented and managed. The State Safety officer and the State Risk Manager shall be notified of the debriefing so that they may participate if desired. The EPO Spill Coordinator can work with the Responsible Party to make recommendations and can provide suggestions on how to access additional training or resources.

## **G. Training**

Persons employed at WMD facilities shall be trained in spill response procedures in accordance with federal, state, and local laws, regulations, policies, and directives. UECOs and other personnel responsible for responding to a spill will complete training requirements that meet the appropriate level of response specified by site specific plans (ICP, SPCC, SWP3), outlined in WMD EPO assessments, and in accordance with federal, state, and local laws, regulations, policies, and directives.

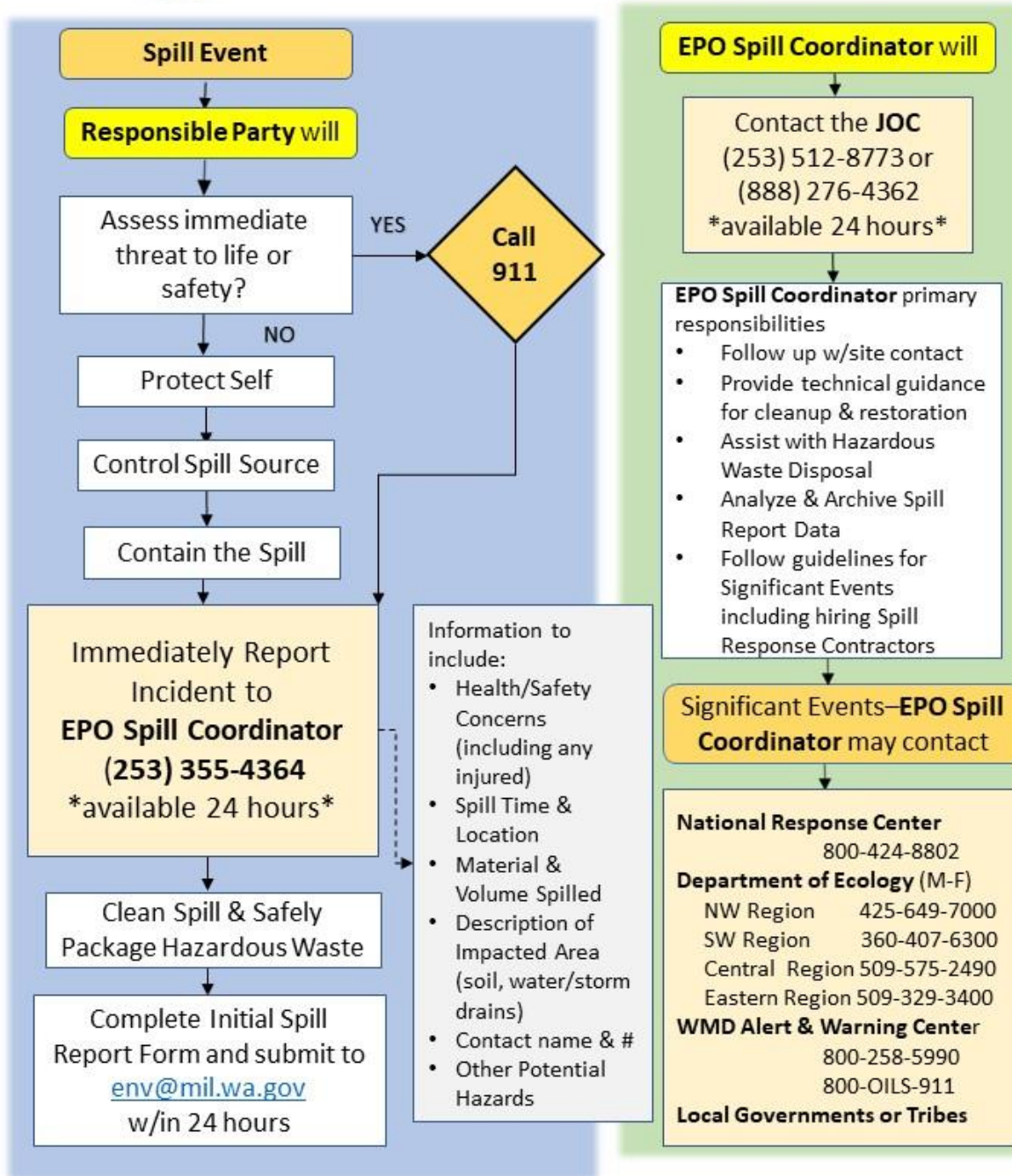
## **H. Contact Information**

WMD EPO Spills Phone (24/7)	253 355-4364
Joint Operation Center (JOC), main line	253 512-8773
JOC, external line	888-276-4362
The National Response Center (NRC)	800-424-8802
WMD State Emergency Response Center	800-OILS-911
Washington Department of Ecology (ECY)	
NW Region	425-649-7000
SW Region	360-407-6300
Eastern Region	509-329-3400
Central Region	509-575-2490

Attachment A: Copy of WMD Environmental Program Office Spill Response Flow Chart



## WMD Environmental Programs Office Spill Response Flow Chart



Last updated: 08/07/2020, supersedes all previous versions

Attachment B: Copy of the Spill Incident Report



**Instructions:** A Spill Incident Report is required to be submitted to the Environmental Program Office (EPO) within 24 hours of a reported incident. Complete each field to the best of your knowledge and include applicable attachments. The completed report with attachments is submitted to [env@mil.wa.gov](mailto:env@mil.wa.gov). Save a copy of this report for facility records. Any questions can be submitted to the above referenced email.

**Facility/Responsible Party Contact**

Contact Name		Street Address Including City, State, and ZIP Code	
Facility Name			
Telephone		Email	
Latitude		Longitude	
Date of Incident		Time of Incident	
Were Emergency Services Contacted?		Time the incident was reported to an EPO Spill Coordinator	

**Details of Incident**

Name of Material spilled/released:		Approximate amount of material spilled/released:	
Describe the cause of the incident:			
Description of area impacted (pervious/impervious):		Approximate area of impact (square feet):	
Describe if spill contacted a water source:		Were there any injuries due to the incident:	

**Details of Response**

Describe measures used to contain and clean spill:			
Was the cleanup measure outsourced?		Did the EPO Spill Coordinator visit the site?	
Was a local spill kit used?		Are more supplies needed for the spill kit?	
Describe future preventative measures (equipment repair, training, etc.):			

**Attachment(s)**

List attachments (photographs, map, etc.):			
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			MM	DD	YY
Report Completed By		Date			
EPO Spill Coordinator		Date			