

CITY OF ANAHEIM PUBLIC UTILITIES DEPARTMENT ORDER

511 – SPILL RESPONSE AND CLEANUP PROCEDURES

I. BACKGROUND

This Department Order (DO) establishes procedures for Department employees when responding to an oil or chemical spill. The intent is to protect public health and property, and comply with regulatory requirements.

II. APPLICABLE REGULATIONS

- 13 California Code of Regulations (CCR) Section 1166, 49 CFR Part 171 (hazardous materials in transport)
- 19 CCR Sections 2620-2659 (hazardous materials at fixed facilities)
- 22 CCR Sections 66264, 66265 (hazardous waste)
- 23 CCR Sections 2250-2260, 2632, 2641 (underground tanks, threatened waters)
- 40 CFR Part 112 (oil), Parts 110, 300, 355 (hazardous substances, reportable quantities),
- 40 CFR Part 761 (polychlorinated byphenyls [PCBs])
- Public Utilities Department Hazard Communication Program

III. STEP-BY-STEP PROCEDURES

A. Advance Preparation

Performing tasks associated with oil and chemical spill containment and cleanup requires training. Depending on the product or material involved, it may require assistance from contractors that are certified to clean up hazardous materials. Some spills may require outside contractors due to the size or safety considerations. Environmental Services will maintain agreements with cleanup contractors to allow for their rapid response, and will coordinate cleanups using contractor resources when needed.

Regulations and policies mandate that Department employees who work with chemical products must have training per the Hazard Communication Program. This training is required for all employees who routinely handle hazardous materials or hazardous wastes, and must be provided prior to being assigned tasks to work with the chemical products. Refer to the Department's written Hazard Communication Program for more information and applicability.

Department employees who work in facilities where oil in large quantities (electrical substations, power plants, well sites, and pump stations) must also be trained to understand the requirements of the facility's Spill Prevention, Control, and Countermeasures (SPCC) Plan and underlying regulatory requirements. Likewise, employees who work in facilities where chemicals are stored or used must be trained to be familiar with the facility's Emergency Response / Contingency Plan in the event of a hazardous material release. Employees who use chemical products, or work in areas where chemicals are used or stored must receive Hazard Communication (HAZCOM) training, which may include:

- Safety Data Sheets (SDS);
- OSHA and Cal/OSHA regulations to prevent worker's chemical exposure
- Methods for safe handling of hazardous materials (e.g. personnel protective equipment, etc.)

- Hazards presented by hazardous materials and processes
- Compliance with environmental laws and regulations
- Facility inspection requirements
- Communication methods and alert/alarm systems
- Spill notification procedures
- Control and containment procedures
- Coordination of emergency response efforts
- Use of emergency response equipment (e.g. water deluge systems, fire extinguishers, etc.)
- Chemical decontamination (use of safety showers, eye wash, etc.)
- Facility evacuation procedures

Periodic refresher training pertaining to these subjects will be coordinated by Environmental Services to ensure Department employees' understanding of requirements, and their readiness in the event of an emergency.

OSHA regulations require workers who respond to spill of hazardous waste or unidentified materials to be trained in "Hazardous Waste Operations and Emergency Response" (HAZWOPER). Water Production staff, Electric Power Generation Technicians, and Environmental Service staff meet this requirement, and may respond to these incidents to the extent they are prepared, equipped, and supported with the appropriate resources. Environmental Services maintains a list of personnel with HAZWOPER certifications.

B. Initial Spill Response

If a spill presents a serious hazard, for example if a waterway is threatened or impacted, or if the personnel on scene are unable to adequately control the material spilled, employees are authorized to call 911 to activate the Emergency Management System (EMS). Alternatively, employees on scene may provide information to the Electric and/or Water System Operator (SO), who are also authorized to call 911. Attachment A provides the Spill Response Contact and Field Guidelines, which contains important phone numbers and related information.

It is important that employees respond only in a manner to which they have been trained, prepared, and equipped. If at any time an incident is determined to be beyond the control of the personnel onsite, employees shall contact their supervisor, the Electric or Water System Operator, or Environmental Services to request additional resources; or they may call 911. Employees shall review the material's Safety Data Sheet (SDS) before conducting any spill cleanup. Employees may Cleanups of small or incidental spills that do not present a serious safety concern may be cleaned up by a Department employee if the employee has received hazard communication training.

Employees on scene shall use their best efforts to secure the impacted area, and prevent unauthorized entry or contact. If there is a potential for a spilled material to flow offsite, or to a storm drain inlet, personnel shall attempt to dam the flow and block the storm drain inlet, or attempt to dam up the flow, or otherwise contain the spill with absorbent material - if this can be done safely within the limits of the employee's training.

C. Spill Reporting and Dispatch Procedure

ALL spills must be reported as described in this Department Order.

When a spill is discovered, the on-scene employee should immediately notify the Electric or Water System Operator (SO) by telephone or radio (Attachment A). The SO shall document the incident on the dispatch log.

The employee on-scene shall convey to following information to the SO:

- The time, date, and location of the spill;
- The name or identification of the material and estimated quantity released;
- A description of the affected area (i.e. parking lot, street, sidewalk, back yard);
- The equipment identification (ID) number and whether the material is known to contain PCBs (for oil spills from electrical equipment);
- Whether a waterway, sewer, or storm drain is impacted or threatened; and,
- Whether greater than \$1,000 damage to property has occurred.

This information should only be collected if safe to do so. If field personnel are unable to determine the requested information, the SO shall contact Environmental Services for assistance. The SO shall document the release on a Spill Report (Attachment B).

The SO will designate a Spill Response Coordinator depending on the level of effort estimated to contain the spill. This person will be responsible for directing spill cleanup. At a minimum, the designee must have HAZCOM training. Requirements for acting as a Spill Response Coordinator are described below:

Spill Type	Quantity (gallons)	HAZCOM Trained Staff	HAZCOM Trained Crew Supervisor	HAZWOPER Trained Staff	Environmental Services	Spill Response Contractor
Oil - No PCBs	<42	No	Yes	Yes	Yes	Yes
Oil - No PCBs	Any	No	No	Yes	Yes	Yes
Oil – PCBs > 5 ppm	Any	No	No	Yes	Yes	Yes
Other Spills	<1	Yes	Yes	Yes	Yes	Yes
Other Spills	>1	No	No	Yes	Yes	Yes

The Environmental Services Manager may designate other staff as Spill Response Coordinator upon reviewing their training and experience.

Oil-filled equipment (i.e. transformers) manufactured prior to 1979 may contain PCBs (typically < 50 parts per million [ppm]). When PCBs are present, the transformer may be marked as such, or the PCB concentration may be noted on the equipment nameplate. Equipment PCB test data are recorded in the Field Equipment Inventory (FEI) database, and the equipment’s 5-digit ID number or serial number can be used to search the FEI for the PCB test results.

D. Notifications

Notifications in addition to those discussed above are described in the following sections and are summarized in the Spill Response Field Guidelines (Attachment A).

All Spills

Employees shall report all oil and chemical spills (regardless of volume) to the SO, who shall notify Environmental Services by email within one hour of receiving the initial spill notification.

Significant Spills

Significant spills require more timely notification as well as to additional parties. Significant Spills include:

- Any quantity posing immediate threat to life or property;
- Impacts to drains or waterways;
- Impacts to the public right-of-way;
- Impacts to swimming pools;
- Damage to private property;
- Spills where the SO has determined contractor support is necessary;
- Spill which require soil excavation; or,
- Spills over Environmental Protection Agency (EPA) reportable quantities (Attachment A or the spilled material's Safety Data Sheet [SDS]);
- Electrical oil spills with PCB concentrations above 5 ppm;
- Estimated property damage exceeds \$1,000.

In these cases, the SO shall immediately notify the following by telephone:

- Field Superintendent or Plant Manager
- Environmental Services Manager
- Operations Manager

If the spill has caused injuries, property damage, or reached a waterway, the Operations Manager shall notify the AGM and the Environmental Services Manager shall notify the Chief Risk Officer.

E. Safety

Maintaining public safety is the highest priority. There may be other safety hazards when responding to a spill. Employees must pay attention to the potential for electric shock, slips and falls, traffic hazards, flammability hazards, and other safety concerns. Employees shall coordinate with SOs to de-energize equipment, and work with other city personnel and contractors to secure the area and provide traffic controls.

F. Spill Cleanup

Employees shall refer to a product's SDS for specific instructions to cleanup spills. SDSs are generally available in each work area, and are available from Environmental Services. When internal staff are cleaning spills, they shall:

- **Wear appropriate personal protection equipment.** If respiratory protection is recommended while using the product or for spill cleanup, then only employees enrolled in the respiratory protection program are to proceed further. Responding employees shall notify the Safety Administrator if respirators are used.
- **Contain free-flowing liquid.** If the liquid cannot be pumped or vacuumed, then free-standing liquids shall be removed using absorbent material (absorbs-it, spill pads, rags, sand, etc.). Cleaning supplies must be contained for disposal.

- **Clean solid surfaces.** Cleanup supplies are available in the warehouse. Wash-water and cleaning supplies must be contained for disposal.
- **Notify Environmental Services.** Environmental Services will coordinate waste disposal and assist with follow-up reporting. Environmental Services will also verify that spill response supplies are replenished.

Absorbent materials must be compatible with the spilled material, and all waste material must be placed in a chemically compatible container. Spill response kits are generally stocked with suitable absorbents, and are located at facilities where chemicals, fuel, or oil are stored. Absorbent materials are also available in the Utilities warehouse.

If soil or vegetation is contaminated with oil or hazardous material, the affected areas must be cleaned or the contaminated material must be removed for proper disposal. Any soil that has visible contamination shall be excavated to the extent feasible. Soil and debris generated from a spill site are typically placed in steel drums. Environmental Services will determine the necessity of additional sampling or use of contractors for soil cleanup.

G. Waste

The Spill Response Coordinator shall ensure all waste containers generated during cleaning are tagged or labeled with the description of the contents. Waste shall be stored in containers compatible with the spilled material as described in the Safety Data Sheets.

A hazardous materials shipping paper (Attachment C) shall accompany spilled materials in transit to the staging area at the EUC. The Spill Response Coordinator shall notify Environmental Services by email or phone when materials are transported. Environmental Services will arrange for proper disposal of the waste within the time frame prescribed by state regulations.

H. Public Notifications

Most chemicals used by the Department are stored in Department-operated facilities; however, care must be taken to protect the public, employees and contractors. Spills from oil-filled transformers located on private property may require public notification. In these cases the Field Superintendent, Field Manager, Environmental Services Specialist or Manager, or Spill Cleanup Coordinator may communicate with the owner or tenant.

For significant spills, communications with the public should be made by the General Manager, Assistant General Manager, Public Information Officer, or delegated spokesperson for the Department. The Environmental Services Manager or Public Information Officer may develop notices to accurately communicate the nature of significant spills, or spills other than oil.

I. Sampling and Analysis

The Spill Response Coordinator and Environmental Services may deem it necessary to collect samples for testing. The Spill Response Coordinator shall ensure that the samples are properly collected and delivered to a State-certified laboratory. Environmental Services shall ensure that testing is properly performed, and that if any residual contamination remains, that the amount is within an acceptable range. Environmental Services will ensure additional remediation is performed if required to meet cleanup goals that may be mandated by a regulatory agency.

J. Agency Notifications

Environmental Services shall ensure that the appropriate regulatory agencies are contacted. The Environmental Services Manager will maintain a procedure for notifying outside agencies when required. A list of agencies which may require notification is included in Attachment A.

K. Documentation

Upon completing the cleanup tasks, the spill cleanup coordinator shall ensure the Spill Report form is filled out completely and returned to Environmental Services. Environmental Services may prepare additional reports if warranted. The Spill Cleanup Coordinator shall document (by photo or drawing) the area of visible contamination. If samples are collected from the spill site, the analytical results shall be included with the written spill report.

L. Record Keeping

Environmental Services shall maintain records related to spills in compliance with the Department's record retention policy.

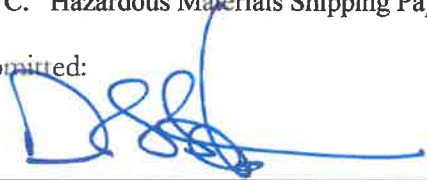
IV. DEPARTMENT ORDER RESPONSIBILITIES

The Environmental Services Manager is responsible for implementation, administrative controls, interpretation, communication, and employee training, and any changes or updates pertaining to this DO.

V. ATTACHMENTS

- A. Spill Response Contacts and Field Guidelines
- B. Spill Report
- C. Hazardous Materials Shipping Paper

Submitted:



Dukku Lee
Public Utilities General Manager

11/15/2017
Date

Approved by the Public Utilities Board on

11/15/2017
Date

Attachment A
Spill Response Contacts and Field Guidelines

Spill Response Contacts and Field Guidelines
 Anaheim Public Utilities
 Environmental Services

Personnel Responsibilities		Spill Discoverer	Responsibilities	Environmental Services
Spill Type	Spill Discoverer	Water or Electric System Operator		
Any quantity posing immediate threat to life or property.	-Ensure personal safety. -Call 911. -Notify System Operator. -Within limits of training and safety, secure the scene, barricade storm drains and waterways, clean up material.	-Notify Field Superintendent or Plant Manager immediately. -Notify Operations Manager immediately. -Notify Environmental Services immediately. -Dispatch other crews as necessary. -Document release.	-Notify outside agencies. -Coordinate contractor response. -Conduct remediation sampling as needed. -Dispose of waste. -Submit post-cleanup reports.	
Impacts to drains or water or Above Reportable Quantity	-Notify System Operator. -Secure scene within limits of training and safety. -Protect nearby storm drains or channels. -Cleanup material using absorbent or request assistance from System Operator. -Ensure waste materials are secured and transferred to EUC.	-Notify Environmental Services immediately. -Dispatch other crews as necessary. -Document release.	-Notify outside agencies, including NRC. -Coordinate contractor response. -Dispose of waste. -Submit post-cleanup reports.	
No impacts to drains or water and Below Reportable Quantity	-Notify System Operator. -Secure scene within limits of training and safety. -Protect nearby storm drains or channels. -Cleanup material using absorbent or request assistance from System Operator. -Ensure waste materials are secured and transferred to EUC.	-Notify Environmental Services immediately (by email). -Dispatch other crews as necessary. -Document release.	-Notify outside agencies. -Coordinate contractor response. -Dispose of waste. -Submit post-cleanup reports.	

Outside Agency Notifications

Spill Type	Timeframe	Agency	Phone Number
Spills which pose immediate threats to life or property	Immediately.	Anaheim Fire and Rescue	911
All Spills	Immediately upon knowledge of the release.	California Office of Emergency Services	(800) 852-7550
All Spills	Immediately upon knowledge of the release.	Anaheim Fire and Rescue – Hazardous Materials Management Section	(714) 765-4000
Spills Reaching Waterways	Immediately upon knowledge of the release.	National Response Center	(800) 424-8802
Spills over Reportable Quantity	Immediately upon knowledge of the release. Written follow-up report required.	National Response Center	(800) 424-8802
Spills on State Highway	Immediately upon knowledge of the release.	California Highway Patrol	911

Spill Response Contractors

Name	Phone Number
Environmental Dynamics	(310) 527-6242
Clean Harbors	(800) 645-8265

Reportable Quantities of Common Utilities Chemicals

Chemical	Reportable Quantity
Sodium Hypochlorite	100 pounds
Oil	42 gallons
Ammonia	100 pounds
Other Chemicals	See 40 CFR 302.4 https://www.epa.gov/eicra/cercla-and-eicra-continuous-release-reporting

Contacts

Name	Phone Number (Office)	Phone Number (Mobile)
Environmental Services – Raljih McCaffrey	(714) 765-4288	(714) 904-2054
Environmental Services – Dena Giacomini	(714) 765-4166	(714) 321-7127
Environmental Services – Jon Sanks	(714) 765-4117	(714) 293-6032
Electric System Operator	(714) 765-4985 (Primary), (714) 991-9811 (Alternate)	---
Water System Operator	(714) 765-4560	---

Attachment B
Spill Report

Spill Location (Address or Describe):	
Type of Material Spilled: <input type="checkbox"/> Transformer Oil <input type="checkbox"/> Diesel <input type="checkbox"/> Sodium Hypochlorite <input type="checkbox"/> Other (Specify):	
Quantity (Gallons):	Impacted Area (feet)
Date and Time Found:	Date and Time System Operator Notified:
Date and Time CA OES Notified:	CA OES Tracking Number:
Equipment ID: <input type="checkbox"/> Not Applicable <input type="checkbox"/> Specify:	PCB Content: <input type="checkbox"/> Specify: <input type="checkbox"/> Unknown Coordinate PCB Cleanup With Environmental Services
Impacts to Drains or Waterways: <input type="checkbox"/> No <input type="checkbox"/> Yes (Describe):	Material Impacted (Check all that apply): <input type="checkbox"/> Concrete <input type="checkbox"/> Asphalt <input type="checkbox"/> Soil <input type="checkbox"/> Vegetation <input type="checkbox"/> Other (Specify):
Impacts to State Highway: <input type="checkbox"/> No <input type="checkbox"/> Yes (Date and Time California Highway Patrol Notified):	
Describe Release (Attach photos and sketch):	
Describe Cleanup Measures Used:	
Number and Types of Waste Containers:	Location of Waste Containers:
Form Completed By:	Contact Number:

Attach Other Pages As Needed
 Return Form to environmental@anaheim.net
Notify Environmental Services Of All Spills Within 1 Hour
 Telephone for Major Incidents, Email for Minor Incidents

Attachment C
Hazardous Materials Shipping Paper

Shipping From:

Shipping To:
 Anaheim Public Utilities
 909 East Vermont Avenue
 Anaheim, CA 92805

Number and Type Of Containers	HM <input type="checkbox"/>	Description	Weight (pounds)
	<input type="checkbox"/>		
	<input type="checkbox"/>		
	<input type="checkbox"/>		

HM = Hazardous Material
 Description = Identification Number, Proper Shipping Name, Hazard Class, and Packing Group

Emergency Contact: System Operator (714) 765-5300

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Supervisor Name (Print) **Signature** **Date**

Driver Name (Print): **Signature** **Date**

Receiver Name (Print): **Signature** **Date**

Return Original Form to Environmental Services (AWT, MS 1101)
 environmental@anaheim.net