

# **Spill Prevention and Response Plan**

**April 2003**

**For**

**U.S. Army Maneuver Support Center  
and Fort Leonard Wood**

**Prepared by:**

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# SECTION 2 SPILL PREVENTION AND RESPONSE PLAN

## 2.1 PURPOSE

This Spill Prevention and Response Plan (SPRP) has been prepared for Fort Leonard Wood, Missouri. It consolidates the following plans into a single document:

- 1) the Spill Prevention Control and Countermeasure (SPCC) Plan required under 40 CFR Part 112;
- 2) the Installation Spill Contingency Plan (ISCP); and
- 3) the RCRA Contingency Plan required under 40 CFR Part 265, Subpart D.

It should be noted that this SPRP is not typical because this document considers Fort Leonard Wood, which consists of many facilities, as a single facility. Rather than being an SPRP for an individual facility, it is a single SPRP for a collection of facilities.

This Fort Leonard Wood SPRP supersedes the previous SPRP, dated 27 February 1998.

## 2.2 SCOPE

The SPCC portion of the plan, Section 3, includes a discussion of the general types of spill prevention procedures, methods, and equipment utilized at the Installation facilities. Appendix A presents specific spill prevention information and recommendations for each site storing POLs. The primary goal of the SPCC is to prevent spills.

The spill response portion of the plan, Sections 4 and 5, specifies responsibilities of individuals and procedures to be followed in the event of a spill or release of oil, hazardous wastes, or hazardous substances. These include spill detection, reporting, containment, clean up, disposal procedures, and notification. In the event of a spill of oil, hazardous waste, or a hazardous substance, concerned parties should refer directly to Section 5 and Appendix B for execution of the spill response plan. Response to accidents or incidents involving chemical agents at the Chemical Defense Training Facility is discussed in the Chemical Accident or Incident Response and Assistance Plan, which is included in Appendix G.

## 2.3 APPLICABILITY

The SPRP is applicable to all personnel assigned to, dwelling on, or employed by Fort Leonard Wood Missouri to include areas of the Installation that manage POLs, hazardous waste, or hazardous substances (as listed in Appendix E). A copy of the Spill Response Roles for Individuals, Teams and Offices must be posted at these locations. This includes both aboveground and underground storage tanks, pipelines and hazardous waste accumulation points.

## 2.4 PLAN REVIEW AND UPDATE

Section 3 and Appendix A of the SPRP must be reviewed at least once every five years, or whenever a change in facility design, construction, operation, or maintenance materially affects the Installation's potential to discharge POLs into or upon waters of the United States. Any amendments will be recorded in the table entitled "Record of Changes" at the front of this plan. Other circumstances that warrant a plan review and update are:

- Modification of the Resource Conservation and Recovery Act (RCRA) permit;
- Changes at a facility that increase the potential for spills or change the spill prevention and response procedures, methods, and/or equipment;
- Failure of the SPRP to be effective in the prevention of or response to a spill event;
- A request of the United States Environmental Protection Agency (EPA) or the MDNR;
- Enactment of or amendment to pertinent federal or state legislation or changes in DOD or Army policy; or
- Changes in adjacent land or water use that would affect spill prevention and response considerations.

The Directorate of Public Works Environmental Division (DPW-EE) is responsible for reviewing recommended changes, monitoring any corrective actions, and amending the SPRP when necessary. When a plan update is initiated, the DPW-EE will conduct a review utilizing the same procedures used for the initial plan development. The review will include a detailed inspection of POLs, hazardous waste, and hazardous substance sites and verification of all data generated during the initial plan development. Based on the review by the DPW-EE, if amendments or changes which significantly affect Section 3 or Appendix A, the plan will be recertified by a professional engineer.

Each organization maintaining a copy of this plan is responsible for reviewing and submitting updates to the DPW-EE. At a minimum, the review must be done to ensure all procedures are being properly followed.

# SECTION 4

## SPILL RESPONSE ROLES FOR INDIVIDUALS, TEAMS, AND OFFICES

### 4.0 SPILL RESPONSE ROLES FOR INDIVIDUALS, TEAMS, AND OFFICES

Any individual observing a petroleum spill (accidental release) or a release or discharge of any amount of hazardous waste and/or hazardous substance, will immediately telephone the Fort Leonard Wood Fire Department at Extension 911.

### 4.1 RESPONSIBILITIES OF INDIVIDUALS

*On Scene Commander (OSC):* Spill response is the responsibility of the Directorate of Public Works. In all cases, the OSC will initially be the most senior person from the Fire and Emergency Services Division (the Fire Department). This position carries out all responsibilities of the on-scene coordinator for emergency response. The Fire Chief will be the OSC upon arrival to the site. The OSC will coordinate and direct the control and cleanup at the scene. The OSC will determine the magnitude and nature of the incident and determine if response by the Installation Assistance Team (IAT) is required. Should the Fire Department determine that the spill is a major incident, or will affect working operations of the installation, notification to the Garrison Commander will be required.

If the OSC determines that the spill is under control and is of a non-hazardous nature, he will immediately turn the role of OSC over to the **Environmental Coordinator (Primary Emergency Coordinator)** for cleanup (see section 4.4.2). This position assumes role of on-scene coordinator for cleanup activities. The DPW Environmental Coordinator will ensure appropriate remediation, restoration, and reporting procedures are accomplished.

*Installation Commander:* The Installation Commander will be notified of the status of emergency response activities, will be consulted and will advise in life-threatening situations, and will activate the Disaster Preparedness Plan, if necessary.

*Environmental Coordinator (EC):* The EC will make any necessary notifications, prepare and submit written reports to the EPA and the MDNR, and will direct the restoration of the site to its previous condition. The EC will be the responsibility of the Directorate of Public Works Environmental Division (DPW-EE). Table 4.1 provides the spill quantities that are reportable to EPA and MDNR.

<b>Table 4.1 Report Spill Quantities</b>		
<b>Material</b>	<b>Reportable Quantity</b>	
	<b>Mass (per 40 CFR Part 302 except where noted)</b>	<b>Volume (assumed density lb/gal)</b>
Aboveground Storage Tanks:	100 lbs	
Diesel		14.1 gal (7.10 lb/gal)
JP-8		14.8 gal (6.75 lb/gal)
Unleaded MOGAS		16.4 gal (6.09 lb/gal)
Used Oil		13.6 gal (7.34 lb/gal)
Asphalt (cut-back)		50 gal (MDNR Reportable for all petroleum products)
Underground Storage Tanks *	Any amount	N/A
Hydrochloric Acid	5,000 lbs	510.2 gal (9.80 lb/gal)
Phosphoric Acid	5,000 lbs	352.1 gal (14.20 lb/gal)
Sulfuric Acid	1,000 lbs	65.4 gal (15.30 lb/gal)
DS-2 (Decontaminating Solution-2)	100 lbs	12.0 gal (8.35 lb/gal)
Waste Paint Thinners/Sludge	100 lbs	9.7 gal (10.27 lb/gal)
Waste Paint		
Solvent	100 lbs	14.9 gal (6.72 lb/gal)
Potassium Dichromate	10 lbs	1.2 gal in solution (8.35 lb/gal)
1,1,1-Trichloroethane	1,000 lbs	82.0 gal (12.20 lb/gal)
Mercury	1 lb	2.3 tablespoons (112.90 lb/gal)
Polychlorinated Biphenyls (PCBs)	1 lb	N/A
Pesticides *	Varies	N/A
Epinephrin Injection *	Any amount	N/A
Formaldehyde	100 lbs	11.1 gal (9.0 lb/gal)
Potassium Permanganate	100 lbs	12.0 gal in solution (8.35 lb/gal)
Super Tropical Bleach (STB)	10 lbs	1.2 gal in solution (8.35 lb/gal)
Miscellaneous Medical Wastes *	Any amount	N/A
Perchloroethylene (Tetrachloroethylene)	100 lbs	7.4 gal (13.6 lb/gal)
Sodium Arsenite	1 lb	N/A
Calcium Hypochlorite	10 lbs	1.2 gal in solution (8.35 lb/gal)
Xylenes	100 lbs	13.3 gal (7.5 lb/gal)
Photographic Fixer	10 lbs	1.1 gal (9.43 lb/gal)

*Person In Charge of the Facility:* The person in charge of the facility or activity responsible for the handling or storage of oil, hazardous wastes, or hazardous substances, or his authorized representative, will ensure that personnel handling these materials have received proper training. In the event of a spill, he will take immediate steps to protect the health of persons in the vicinity of the spill and protect the environment. He will be responsible for ensuring that absorbent and cleanup materials are kept on hand and that a proper spill report has been made. (Appendix C of the SPRP).

In accordance with AR 200-1, the facility occupant will be required to clean up spills, if manpower and equipment are available, under the direction of the OSC. The person in charge of the facility will be responsible for preparing a complete hazardous materials inventory of the facility, in accordance with the installation Hazard Communication Policy, and will appoint a Facility Hazard Communication Officer.

*Facility Hazard Communication Officer:* The Facility Hazard Communication Officer will be responsible for providing the inventory list and Material Safety Data Sheets (MSDSs) to the first responder in the event of a spill. He will complete the Spill Report Form attached as Appendix D to this SPRP and submit it to DPW within three days of the spill event.

## **4.2 RESPONSIBILITIES OF TEAMS**

*First Responders:* The DPW Fire and Emergency Services Division are the first responders to spill incidents. All members will be trained in hazardous material spill response and will participate in annual training and exercises to maintain proficiency. The training and exercises should be developed in accordance with the *National Preparedness Response Exercise Program (PREP) Guidelines*. In the event of a spill outside Army property, any of the Government personnel assigned to these teams may be made available to State and other Federal agencies.

*Installation Assistance Team (IAT):* The IAT consists of Preventive Medicine, Directorate of Public Works Environmental Division, Engineer Branch Safety Office, Public Affairs Office, Military Police, and the Emergency Operations Center. This team will assist the OSC in their respective fields of expertise.

*Spill Cleanup Team (SCT):* The DPW Facilities Maintenance and Support Services Contractor is designated as the SCT, except for those spills of minor magnitude that can be taken care of by the individual organization. Response time from the SCT, in an emergency situation, will be no more than 15 minutes. The SCT will, upon direction from the OSC, respond to spill incidents and provide personnel (as determined by the contractor), supplies, and equipment to contain and clean up pollutants. This list of supplies and equipment maintained at Fort Leonard Wood are listed in Appendix C.

Work that can be accomplished in 32 manhours of labor or less and costs less than \$2,000 for parts and materials will be completed by issuance of a Service Order. Work that goes beyond this scope will be completed by the SCT upon direction of the Contracting Officer (Mr. Don Blotzer, or successor). Certification of available funds must be achieved through the DPW Business Management Branch. The SCT will be trained, as outlined in 29 CFR Section 1910.120, in spill containment, cleanup, and disposal techniques. The OSC will direct the cleanup operation and take the necessary actions

to dispose of cleanup materials and any contaminated media in an environmentally sound manner.

*Installation Operations Center (IOC):* Upon activation, the IOC will assist the OSC by notifying other members of the IAT, communicating with other responsible personnel, and arranging for organizations other than the SCT to provide personnel, supplies, or equipment. The IOC will relay information from the OSC to the Command Group and other activities as required.

### **4.3 RESPONSIBILITIES OF OFFICES**

*Public Affairs Office (PAO):* PAO will be notified in the event of a major spill where the contamination would be such that it would require evacuation of facilities, and/or the contamination could reach major lakes, streams, and rivers or in any situation where contamination would impact the public on or off the installation. The PAO would then be responsible for notifying the public in accordance with the Crisis Communications Plan.

*Staff Judge Advocate:* The Staff Judge Advocate will provide legal assistance for compliance with federal and state laws and regulations and handle any claims resulting from spills or discharges. At the request of the OSC, personnel from this office will respond to any oil, hazardous waste, or hazardous substance spill to ensure that information, records, and samples adequate for legal purposes are obtained and safeguarded for future use. This office will also advise the OSC on the legal aspects of spill response when parties other than the Army are responsible for the spill.

*Directorate of Public Works - Environmental Division (DPW-EE):* The DPW-EE will assume management and possession of hazardous wastes, contract for removal of PCBs and hazardous wastes, and provide other support as outlined in this SPRP.

*DPTM's Photograph Branch:* The DPTM's Photograph Branch will ensure that a photographer is available to document the extent of the spill, containment countermeasures, and restoration procedures utilized as directed by the OSC.

*Military Police:* The Military Police will carry out evacuation of facilities and control access to the site of a release as directed by the OSC.

*Department of Navy, Naval Sea Systems Command:* The Department of Navy, Naval Sea Systems Command, Supervisor of Salvage (SUPSALV) will assist Fort Leonard Wood in response to major releases of petroleum products that reach surface water bodies. Fort Leonard Wood is authorized to utilize SUPSALV for Tier II and Tier III oil spill response activities in fulfillment of the Oil Pollution Act of 1990. SUPSALV resources can be requested by telephone at (703) 607-2758 during normal working hours or (703) 602-7527 during non-working hours. A heads-up notification can be given to SUPSALV with an official request including authorization to reimburse SUPSALV for costs incurred made to the Chief of Naval Operations, Naval Command Center. Standard response from the SUPSALV facilities would be on the order of 30 hours.

#### **4.4 RCRA CONTINGENCY PLAN**

This RCRA Contingency Plan has been prepared to comply with 40 CFR Part 265, Subpart D. The RCRA Contingency Plan describes actions to be taken to minimize hazards to human health or the environment from an unplanned release of hazardous waste or hazardous waste constituents to the air, soil or surface water.

A SPCC Plan has been prepared in accordance with 40 CFR Part 112, and the SPCC Plan has been amended to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of the RCRA Contingency Plan. A separate document is not required.

##### **4.4.1 Emergency Response Agreements [40 CFR Section 265.52 (c)]**

The DPW Fire and Emergency Services Division along with the DPW Environmental office is tasked as the Primary Response Team. Police activities on the base are provided by the Military Police. The Department of Army maintains a hospital on base. A contractor is in place to act as the Spill Cleanup Team. All of these resources are under the immediate and direct control of the On Scene Commander in the event of a release of hazardous waste or hazardous waste constituents. The Installation Commander has additional resources available through mutual aid agreements with nearby police and fire departments (Appendix C).

##### **4.4.2 Emergency Coordinators [40 CFR Section 265.52 (d)]**

The On Scene Commander will act as the Emergency Coordinator in the event of a release of hazardous waste or hazardous waste constituents. The On Scene Commander will initially be the senior Fire Department officer at the scene. Notification should be made through the Fire Department by dialing 911. Once the scene is stabilized, the role of On Scene Commander will be turned over to the Environmental Coordinator (see Section 4.1). The progression of On Scene Commanders ("P" denotes primary, "A" denotes alternate) for emergency response is as follows:

Contact names for official use only.

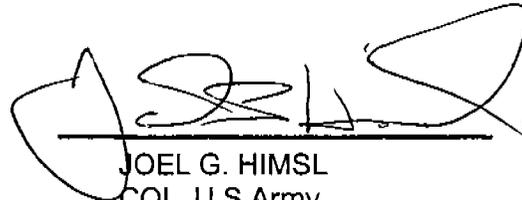
##### **4.4.3 Emergency Equipment [40 CFR Section 265.52 (e)]**

Emergency equipment to be used in the event of a release of hazardous materials or hazardous material constituents is listed in Appendix C.

##### **4.4.4 Evacuation Plan [40 CFR Section 265.52 (f)]**

Each individual facility will have a posted evacuation plan. The evacuation of adjacent facilities will be accomplished by the Military Police under the direction of the On Scene Commander.

I Hereby approve the Fort Leonard Wood Spill Prevention and Response Plan (SPRP).



29 APR 03

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JOEL G. HIMSL  
COL, U.S. Army  
Garrison Commander

# APPENDIX D

## SPILL REPORT FORM

**Subject: Spill Prevention and Response Plan (SPRP)**

**SPILL REPORT FORM**

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Complete this report form for any spill or release of Oil, Hazardous Waste, or Hazardous Material into the environment. The information contained in this report must immediately be given to the DPW Fire Dept. at 911. The report itself must be submitted to the DPW Environmental Office within three (3) days of the incident.

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1. Telephone report to \_\_\_\_\_ made by:  
Name: \_\_\_\_\_ Signature: \_\_\_\_\_  
Title: \_\_\_\_\_ Location: \_\_\_\_\_  
Unit: \_\_\_\_\_ Company: \_\_\_\_\_  
Date: \_\_\_\_\_ Time: \_\_\_\_\_
2. Material spilled: \_\_\_\_\_
3. Quantity/ Volume spilled: \_\_\_\_\_
4. Location of spill: \_\_\_\_\_
5. Date, time, and duration of spill: \_\_\_\_\_
6. Cause of spill: \_\_\_\_\_  
\_\_\_\_\_
7. Corrective actions taken to control and/or mitigate the effects of the spill: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
8. Plan for preventing recurrence: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
9. Others contacted (i.e. Fire Department)  
\_\_\_\_\_ Date/time: \_\_\_\_\_  
\_\_\_\_\_ Date/time: \_\_\_\_\_

NOTE: Use blank sheets to furnish additional information on any of the above items.