IDDE APPENDIX I
Spill Prevention Containment and Countermeasures

U.S. ARMY GARRISON - HAWAII
(USAG -HI)

SPILL PREVENTION, CONTROL and COUNTERMEASURES (SPCC) PLAN

Date: October 9, 2009

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CERTIFICATION

I have completed review and evaluation of the U.S. Army Garrison – Hawaii Spill Prevention, Control and Countermeasures Plan in October 2009, and have amended the Plan as a result. A summary of the changes to the plan is provided on the following page.

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RECORD OF CHANGES

Date of Change	Page # of Change	Description of Change	Recertification Required?	Date of Recertification
May 2008	Various	• Update of facility inventories, maps, controls, and recommendations • Addition of facilities storing animal and vegetable fats and oils • Addition of general spill prevention procedures for dining facilities • Update of contact information, inspection forms	Yes	May 8, 2008
October 2009	p. vii p. 14 p. 16-17	• Added bldg. 1700 and bldg 1700 ASTs to the SPCC database • Added the abbreviation "PMCS" • Changed written reporting requirement to exempt small spills occurring on concrete and cleaned up immediately • Changed requirement for fuel tanker secondary containment waivers	Yes	

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- Helemano Military Reservation
- Fort DeRussy
- Pohakuloa Training Area
- Kilauea Military Camp

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Appendix I — Inventories

Mobile Fuel Tanks/Fuel Vehicles
USTs/Oil/Water Separators
Grease Traps
Appendix J 40 CFR 112 Oil Pollution Prevention Regulation

LIST OF ABBREVIATIONS

AAFES	Army and Air Force Exchange Service
AMR	Aliamanu Military Reservation
AR	Army Regulation
AST	Aboveground Storage Tank
AUL	Authorized Usage List
BMP	Best Management Practice
BN	Battalion
CERCLA	Comprehensive Environmental Response, Compensation, & Liability Act
CFR	Code of Federal Regulations
CHRIS	Chemical Hazard Response Information System
DAAF	Dillingham Army Air Field
DA	Department of the Army
DA PAM	Department of the Army Pamphlet
DHS	Director of Health Services
DoD	Department of Defense
DOT	Department of Transportation
DPW	Directorate of Public Works
EAS	Emergency Alert System
ECO	Environmental Compliance Officer
EO	Executive Order
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
EQCC	Environmental Quality Control Committee
ER	East Range
FEMA	Federal Emergency Management Agency
FDR	Fort DeRussey
FIBC	Flexible Intermediate Bulk Container
FRP	Facility Response Plan
FS	Fort Shafter
HDOH	Hawaii Department of Health
HAR	Hawaii Administrative Rules
HAZCOM	Hazard Communication
HazMat	Hazardous Materials
HEMTT	Heavy Expanded Mobility Tactical Truck
HMR	Helemano Military Reservation
HSPD	Homeland Security Presidential Directive
HW	Hazardous Waste
HWSSP	Hazardous Waste Shop Storage Point
H&SP	Health and Safety Plan
IAG	Inter-Agency Agreement
ICS	Incident Command System
IHMWP	Installation Hazardous Waste Management Plan
ISCP	Installation Spill Contingency Plan

ISPC	Installation Spill Prevention Coordinator
IOSC	Installation On-Scene Coordinator
IRT	Installation Response Team
LEPC	Local Emergency Planning Committee
KTA	Kahuku Training Area
KMR	Kawaihae Military Reservation
KMC	Kilauea Training Camp
KMR	Kilauea Military Reservation
LEPC	Local Emergency Planning Committee
MPC	Motor Pool Complex
MSDS	Material Safety Data Sheets
NCP	National Oil and Hazardous Substance Pollution Contingency Plan
NIMS	National Incident Management System
NOAA	National Oceanic and Atmospheric Administration
NRC	National Response Center
OHS	Oil and Hazardous Substances
OPA	Oil Pollution Act
OSHA	Occupational Safety and Health Administration
OWS	Oil Water Separator
PAO	Public Affairs Office
PE	Registered Professional Engineer
PCB	Polychlorinated Biphenyls
PMCS	Preventive Maintenance Checks and Services
POL	Petroleum Oil and Lubricants
PTA	Pohakuloa Training Area
RCRA	Resource Conservation and Recovery Act
RMSSP	Recyclable Materials Shop Storage Point
RP	Responsible Party
RQ	Reportable Quantities
RRT	Regional Response Team
SARA	Superfund Amendments and Reauthorization Act
SB	Schofield Barracks
SERC	State Emergency Response Commission
SJA	Staff Judge Advocate
SOP	Standard Operating Procedure
SPCCP	Spill Prevention Control and Countermeasures Plan
TAMC	Tripler Army Medical Center
TAP	Temporary Accumulation Point (Hazardous Wastes)
TGM	Technical Guidance Manual
TSDF	Treatment Storage and Disposal Facility
USAG-HI	United States Army Garrison-Hawaii
USARHAW	U.S. Army Hawaii
USDHS	U.S. Department of Homeland Security
USEPA	U.S. Environmental Protection Agency
UST	Underground Storage Tank
WAAF	Wheeler Army Air Field

1.0 INTRODUCTION

1.1 PURPOSE AND SCOPE

The purpose of this Spill Prevention, Control and Countermeasures Plan (SPCCP) is to fulfill the Federal requirement to have an SPCCP for facilities that: (a) have a minimum of 1,320 gallons total capacity of petroleum products in the total number of above ground storage tanks (ASTs) on their property or a total completely buried oil storage capacity (UST) greater than 42,000 gallons. This update to the SPCCP also addresses provisions of the Final Rule amending requirements of the Oil Pollution Prevention regulation at 40 CFR 112 dated 26 December 2006. The Oil Pollution Act of 1990, Facility Response Rule [40 CFR 112] dated 30 June 2000 and the Resource Conservation and Recovery Act (RCRA) of 1976 required facilities to develop Facility Response Plans (FRP), which evolved into Oil and Hazardous Substance Plans. DA PAM 200-1, Chapter 3, directs that the FRP be integrated into an installation's SPCCP. Since the USAG-HI facility is not classified as a substantial harm facility according to 40 CFR 112.20(f) (See checklist in Appendix G), submittal of an FRP is not required. However, preparation of an Oil Spill Contingency Plan in accordance with 40 CFR 109 is required and is included in this plan.

The requirements for the SPCCP are outlined as follows:

1) To identify locations and activities where the potential exists for harmful discharges to the environment of animal fat/vegetable oil, or petroleum, oil, and lubricants (POL). The definition of oil includes animal fats and vegetable oils as well as petroleum products as specified in the Final Revised SPCC Rule dated 17 July 2003.

2) To establish a general spill prevention program and specific guidelines for facilities identified below.

3) To outline spill response procedures for personnel in identified facilities.

This plan meets regulatory requirements and is applicable to units and activities required to have a SPCCP under 40 CFR 112 .1(d)(2)(ii) on the following United States Army Garrison - Hawaii (USAG-HI) Installations:

Aliamanu Military Reservation (AMR)
Dillingham Army Air Field (DAAF)[Note 1]
East Range (ER)
Fort DeRussy (FDR)
Fort Shafter (FS)
Helemano Military Reservation (HMR)
Kahuku Training Area (KTA)[Note 1]
Kawaihae Military Reservation (KMR)[Note 2]
Kilauea Military Camp (KMC)
Makua Military Reservation (MMR)[Note 1]
Pohakuloa Training Area (PTA)
Schofield Barracks (SB)

Tripler Army Medical Center (TAMC)
Wheeler Army Air Field (WAAF)

Note 1: Does not exceed aboveground storage tank (AST) 1,320 gallon capacity except during training exercises if a Heavy Expanded Mobility Tactical Truck (a) is used to refuel vehicles. SPCCP not required.
Note 2: Does not exceed AST 1,320 gallon capacity except when vehicles are unloaded at dock and fueled for trip to PTA.

Specific information on each installation and how the SPCCP applies to the above installations is provided in Appendix A. Site specific information on facilities that use and store POL, animal or vegetable fats or oils in containers that exceed the "de-minimis" container size of 55 gallons, ASTs that exceed the "de minimis" container size of 55 gallons, along with related pollution prevention and control recommendations, facility maps, and potential spill receptors are addressed in an Access database titled "Hawaii SPCCP". A DVD containing the database is provided in Appendix A.

Contractors and tenants working on the USAG-HI installations listed above that do not provide direct support to the Army or USAG-HI organizations are not covered under this SPCCP. A requirement of their contract or Support Agreement is that they develop their own SPCCP and provide a copy to DPW, Environmental Division (DPW-ED) and the Contracting Office. Facilities and units are not required to have an SPCCP if they have less than 1,320 gallons total storage capacity in the total number of above ground storage tanks (ASTs) or more than 42,000 UST total storage capacity on their facility.

The Final Rule amendments to the SPCCP of the Oil Pollution Prevention Regulation allows facilities with a total oil storage capacity of 10,000 gallons or less total storage capacity to self certify their SPCCP in lieu of a review and certification by a Professional Engineer. The SPCCP should clearly address the following three areas:

- Operating procedures that prevent oil spills;
- Control measures installed to prevent a spill from reaching navigable waters; and
- Countermeasures to contain, clean up, and mitigate the effects of an oil spill that reaches navigable waters.

The Oil Pollution Prevention and Response; Non-Transportation-Related Onshore and Offshore Facilities; Final Rule, dated 17 July 2002, revised the specified elements and sequence format of the SPCCP. If the Plan does not follow the revised sequence, it must supplement it with a section cross-referencing the location of requirements listed in the revised rule and the equivalent requirements in the Plan. In Section 1.3 there is a table that lists each requirement in the revised rule, provides the corresponding paragraph of the current rule, and shows the location of the provision in the Plan.

1.2 APPLICABLE LAWS

1.2.1 Department of the Army

Army Regulation (AR) 200-1, Environmental Protection and Enhancement, requires Army Installations and Facilities to implement the provisions and requirements of the Clean Water Act, including the preparation of a Spill Prevention Control and Countermeasures Plan (SPCCP).

Department of the Army Pamphlet (DA PAM), 200-1, Environmental Protection and Enhancement, explains how the Army will execute the "U.S. Army Environmental Strategy into the 21st Century" and provides detailed guidance to support implementation of AR 200-1 to include: water resources management, oil and hazardous substances spills, hazardous materials management, hazardous and solid waste management, air pollution, environmental noise management, asbestos management, radon reduction, pollution prevention, environmental restoration, environmental quality technology, automated environmental management systems, the Army environmental program in foreign countries, and other miscellaneous topics.

1.2.2 Federal Regulations

Section 311 of the **Clean Water Act** addresses prevention of pollution resulting from oil and hazardous substance release and directs the Environmental Protection Agency (EPA) to promulgate regulation regarding harmful discharges of oil and hazardous materials to the environment.

The **Oil Pollution Act of 1990** addresses contingency planning requirements for facilities to prevent and respond to harmful discharges of oil and hazardous materials.

The **Oil Pollution Prevention Regulation, 40 CFR 112,** addresses specific requirements and provisions for the preparation of SPCC Plans.

Discharge of Oil, 40 CFR 110, defines reporting requirements and responsibilities for discharges of oil into or on bodies of water.

Designation, Reportable Quantities, and Notification, 40 CFR 302 defines Reportable quantities (RQs) of hazardous substances. A RQ is the threshold amount of any substance that must be reported to the National Response Center (NRC) when a release equal to or greater than the threshold occurs.

The EPA's regulations on the maintenance and operations of underground storage tanks are contained in **40 CFR 280**.

The Occupational Safety and Health Administration (OSHA) regulations contained in **29 CFR 1910.120** describe training requirements for personnel handling or responding to oil spills and/or other hazardous substances.

The Comprehensive Environmental Response, Compensation, & Liability Act (CERCLA), also known as Superfund, contains a list of hazardous substances and the RQs that trigger reporting and cleanup.

Resource Conservation and Recovery Act (RCRA) of 1976 describes hazardous waste management requirements for generators and treatment, storage and disposal facilities. The State of Hawaii has been given primacy to manage and enforce the federal regulations. See Hawaii Administrative Rules.

Emergency Planning & Community Right-to-Know Act (EPCRA) of 1986 requires specified facilities to collect and report information on storage, manufacture, process, and use of chemicals in excess of designated "threshold planning quantities." Federal facilities are required to comply with this act through Presidential Executive Order 13423, Strengthening Federal Environmental, Energy, and Transportation Management, . Required reports are provided to the EPA, the State of Hawaii Department of Health (HDOH), the City and County, and local fire departments for use in emergency planning and response.

Homeland Security Presidential Directive-5 (HSPD-5) directed the Secretary of the U.S. Department of Homeland Security (USDHS) to develop and administer a National Incident Management System (NIMS). This system provides a consistent nationwide template to enable Federal, State, local, and tribal governments and private-sector and nongovernmental organizations to work together effectively and efficiently to prepare for, prevent, respond to, and recover from domestic incidents, regardless of cause, size, or complexity, including acts of catastrophic terrorism. USDHS has developed a National Response Plan which forms the basis for how the federal government will coordinate with state, local and tribal governments and the private sector during the response to a national incident.

1.2.3 United States Environmental Protection Agency (USEPA) Facility Response Rules (FRP)

The USEPA established requirements for a Facility Response Plan (FRP) that was published as a Final Rule on 1 July 1994. AR 200-1 (par 3-3b) requires facilities to include the FRP as part of the Facility SPCCP. However, since the total oil storage capacity at USAG-HI facilities does not exceed the specified threshold, this plan does not incorporate the FRP. (See Appendix H, Substantial Harm Checklist).

1.2.4 Hawaii Department of Health (HDOH) Regulations

The HDOH administers state regulations reflecting federal regulations with regard to the management of Underground Storage Tanks (USTs), and response to oil and hazardous substance spills.

Title 11-451 Hawaii Administrative Rules (HAR) "The State Contingency Plan" describes State requirements for response and notification for spills of oil and hazardous substances.

Title 11-260-268 HAR "Hazardous Waste Management" governs the storage, handling, transportation, and disposal of hazardous waste.

Title 11-279 HAR "Hazardous Waste Management Standards for the Management of Used Oil" describes State of Hawaii requirements for handling, storing and disposing of used oil.

Title 11-281 HAR "Underground Storage Tanks" describes State of Hawaii requirements for operating and maintaining USTs. These requirements are described in a state document:

> The "**Technical Guidance Manual for Underground Storage Tank Closure and Release Response**" dated March 2000 describes release response and notification requirements for discharges associated with USTs. Hawaii state guidelines for corrective action at UST release sites use risk-based decision-making which is a process that utilizes risk and exposure assessment methodology to help UST implementing agencies make determinations about the extent and urgency of corrective action and about the scope and intensity of their oversight of corrective action by UST owners and operators.

1.3 ORGANIZATION OF THIS SPCCP

The Oil Pollution Prevention and Response; Non-Transportation-Related Onshore and Offshore Facilities; Final Rule, dated 17 July 2002, specifies the elements and sequence format of the SPCCP. The plan is organized as follows:

1.3.1 Section 1: Introduction

Outlines the scope and applicability of this plan and provides an overview of applicable regulations and laws and the broad responsibilities of the principal parties involved in enforcing, maintaining, and implementing this SPCCP.

1.3.2 Section 2: Spill Prevention

Outlines general prevention measures, requirements, and provides a general discussion of facilities subject to SPCCP requirements.

1.3.3 Section 3: Control and Response

Addresses spill response procedures, the composition and operation of the Installation Response Teams, reporting, and follow up actions.

1.3.4 Section 4: Employee Training

Addresses training requirements for personnel handling oil and hazardous materials and personnel involved in spill response.

1.3.5 Section 5: Plan Amendments

Addresses the process for reviewing and amending this plan.

1.3.6 Appendices

Appendix A: Contains the following inventories: (a) facilities by installation that store and manage POL or animal or vegetable fats or oils in containers with capacity equal to or exceeding 55 gallons; (b) all major components of the pipeline on Wheeler AAF; (c) all aboveground and non-regulated underground storage tanks under U.S. Army control by installation; and (d) a listing of all transformers by installation. The Access database also contains site photos and facility maps and identifies pollution prevention controls, spill receptors and recommendations for corrective actions. (Note: An inventory of the pad-mounted transformers located on USAG-HI facilities is maintained by the SPCC Coordinator and is included by incorporation.)

Appendices B through I: Contain inspection checklists for USAG-HI installations, forms for reporting spills, tables of reportable quantities of oil and hazardous substances, UST/oil/water separator and grease trap inventories, the Substantial Harm Criteria Checklist, and guidelines for spill response activities.

Appendix J: Contains a copy of 40 CFR 112, Oil Pollution Prevention regulation, all applicable aspects of which will be complied with regardless of if explicitly stated within the contents of this SPCCP.

1.3.7 Cross Reference

Since this plan deviates from the specified sequence for different requirements of the SPCCP as specified the Oil Pollution Prevention and Response; Non-Transportation-Related Onshore and Offshore Facilities; Final Rule, dated 17 July 2002, Table 1-1 lists each requirement in the revised rule and shows the location of the provision in the Plan.

Table 1-1 Cross Reference Table for SPCC Requirements

Revised Rule	Description of Rule	Section(s)
§112.7	General requirements for SPCC Plans for all facilities and all oil types.	1.0
§112.7(a)	General requirements; discussion of facility's conformance with rule requirements; deviations from Plan requirements; facility characteristics that must be described in the Plan; emergency procedures.	2.1, 2.2, 2.3, 3.3, 3.4, Appendix A (Access Database)
§112.7(a)(3)(i)	Type of oil, storage capacity	Appendix A (Access Database)
§112.7(a)(3)(ii)	Discharge prevention procedures	2.3.2.4

§112.7(a)(3)(iii)	Discharge or drainage controls	Appendix A (Access Database), 2.2.3.2, 3.4, 3.5
§112.7(a)(3)(iv)	Countermeasures	3.3, 3.4
§112.7(a)(3)(v)	Disposal of recovered materials	3.4.1.8
§112.7(a)(3)(vi)	Contact list, phone numbers	3.2
§112.7(a)(vi)(4)	Spill reporting procedures	3.3.2.1, 3.3.2.2, 3.4.3
§112.7(a)(vi)(5)	Spill procedures	3.2, 3.3.3.4, Appendix D
§ 112.7(b)	Potential for equipment failures	Appendix A (Access Database)
§ 112.7(c)	Secondary containment	2.2.3.1, Appendix A (Access Database)
§ 112.7(d)	Secondary containment not practicable, contingency planning	2.3.2.15, 3.0 – 3.5
§ 112.7(e)	Inspections, tests, and records	2.2.3.2, Appendix B
§112.7(f)	Employee training and discharge prevention procedures	1.4.10, 2.2.3.4, 4.0
§112.7(g)(1) – (g)(5)	Security – fencing, flow and drain valves, pump starter controls, not in service or standby loading/unloading connections, lighting	2.3.1, 2.3.2.2, Appendix A (Access Database)
§112.7(h)	Loading/unloading (excluding offshore facilities)	2.3.2.4
§112.7(i)	Brittle fracture evaluation requirements	n/a
§112.7(j)	Conformance with State requirements	1.2, 2.3
§112.7(k)	Qualified oil-filled operational equipment	2.3.2.15
§112.8(b) §112.12(b)	Facility drainage systems	2.2.3.1, Appendix A, Appendix B
§112.8(c) §112.12(c)	Bulk storage containers – compatibility, secondary containment, secondary containment drainage, aboveground container integrity testing, discharge controls, visible discharges, mobile or portable oil storage containers	2.2.3.1, 2.2.3.2, 2.3.2.2, 2.3.2.11, Appendix A, B
§112.8(d) §112.12(d)	Facility transfer operations, pumping, and facility process	2.3.2.2, 2.3.2.4, Appendix A

1.4 RESPONSIBILITIES

1.4.1 Commander, U.S. Army Garrison Hawaii

Spill Planning

1) Review and approve the Plan.

Spill Prevention

1) Designate the Director of Public Works (DPW), USAG-HI as responsible for training and enforcement of spill prevention and maintenance requirements contained in this plan.

2) Allocate resources, as available, to implement the provisions of this plan.

Spill Response

1) Direct the DPW to designate qualified DPW Environmental Compliance Program Managers as the Installation On-Scene Coordinators, responsible for coordinating spill response and cleanup operations.

2) Direct units and activities to comply with spill clean-up requirements of this plan, under the direction of the Installation On-Scene Coordinator (IOSC).

1.4.2 Director of Public Works (DPW)

Spill Planning

1) Maintain and enforce the provisions of this plan.

2) Conduct periodic review of facilities and provisions for changes and updates to this plan.

Spill Prevention

1) Director or his designated representative will serve as the Installation Spill Prevention Coordinator (ISPC) who will direct training and inspection of units and facilities to comply with spill prevention procedures in this plan.

2) Ensure all units and organizations participate in the Environmental Compliance Officer (ECO) program.

3) Ensure secondary containment and spill prevention provisions are maintained at existing facilities and incorporated into new or temporary facilities activities.

4) Designate in writing an individual as the SPCC Coordinator.

Spill Response

1) Designate in writing qualified DPW Environmental Compliance Program Managers as the Installation On-Scene Coordinators (IOSCs) who will notify and coordinate the Installation Response Team (IRT) as detailed in Section 3.2.4. This includes supervision and use within their capability of DPW in-house workers, contractors, troops, other supporting staff and other Department of Defense (DoD) organizations and civilian agencies with whom a spill response support agreement has been signed.

2) Provide DPW construction equipment, with trained and qualified operators, for SPCCP and ISCP activities, as necessary.

3) Ensure the construction or installation of new storage tanks or facilities for the storage and handling of oil and hazardous materials/substances are in compliance with the provisions of this plan.

4) Notify the DPW SPCC Coordinator of any changes to the SPCCP and spill response procedures and responsibilities.

1.4.3 DPW SPCC Coordinator

1) The DPW SPCC Coordinator will be designated by the Director of Public Works.

2) Maintain and update administrative aspects of the SPCCP such as alert rosters, internal DPW Standard Operating Procedures (SOP), and point of contact lists.

3) Make recommendations and advise the professional engineer overseeing the SPCCP review and re-certification.

4) Assist ISPC by reviewing records of training, assist in scheduling training to ensure all personnel working with materials identified in the SPCCP are properly trained, and correct deficiencies in IRT member skills.

5) Maintain inventory database and records of releases of oil for installations covered by this plan.

6) Establish procedures with DPW Engineering to ensure that all maps are kept up to date with new facilities and major changes to existing facilities that may impact the spill receptor(s), response routes and/or quantities of materials used and stored at these facilities.

7) Respond to spills as required based on the facility information in the SPCCP Appendix A, Access Database and the information provided by the facility or unit and provide technical support for units recovering minor spills, as needed.

8) Respond or coordinate response to major spills. A spill is classified as a "major spill" based on the material, quantity and potential receptors. Any spill that goes off the installation will be treated as a major spill until determined otherwise.

9) Ensure spills are reported, when required, to appropriate outside agencies.

10) Periodically review and audit components of this plan to ensure that inspections and maintenance are performed on storage tanks, electrical transformers, and other locations where oil is stored or handled.

11) Ensure new construction or installation of facilities for the storage and handling of oil incorporate the provisions of this plan.

12) Provide continuity and consistency to spill response within USAG-HI.

13) Initiate technical changes and amendments to this plan when required in accordance with Section 6 of this plan and require a review, evaluation and certification by a registered professional engineer. In accordance with 40 CFR 112.5(b), recertification of the SPCCP is required at least once every five (5) years, and as necessary due to major changes in the use and storage of oil.

14) Participate in the activities of the Local Emergency Planning Committee (LEPC), and comply with requests for information from the committee or other parties through the Public Affairs Office (if available under the Freedom of Information Act). See LEPC contact information in Table 3-4.

15) Coordinate Installation Response Team (IRT) training. Ensure DPW members with responsibilities under the SPCCP receive adequate training for carrying out the provisions of this Plan.

16) Develop and maintain emergency spill response contracts as deemed necessary. Include contracted spill responders in spill drills and in the planning of exercises.

17) Maintain an inventory of spill supplies and response equipment available for use by the IRT. Update the inventory at least annually.

18) Maintain internal DPW IRT mobilization procedures for major spills. The procedures and this plan must be available to personnel designated in writing by the Director, DPW, as IOSCs at all times.

19) Provide SPCC training for all personnel assigned duties under the plan, as needed.

1.4.4 Commanders at Remote Installations: Pohakuloa Training Area, Kilauea Military Camp

1) Ensure that all units, including tenants and contractors, notify the DPW Environmental Office immediately of any substantial changes in fuel storage facilities or operational methods that will require modification of this plan.

2) Immediately report all spills to the facility DPW Environmental Office, (808) 656-1111. For major spills, notify Fire Departments and Medical Facilities immediately. At KMC the Directorate of Public Works Engineering Office is (808) 967-8379. At PTA the Directorate of Public Works DPW Team Supervisors phone number is (808) 969-2436. Submit follow-up Spill Notification Form at Appendix B to DPW-ED.

3) Maintain copies of this SPCCP.

1.4.5 Military Police

1) Immediately report all spill calls received to the USAG-HI DPW-ED Office, 656-1111.

2) Respond to spills. Isolate the spill area and control traffic. Ensure that the Fire Department and Medical Facility have been notified.

3) Maintain a copy of this SPCCP.

4) Designate personnel to attend and receive SPCC-related training.

1.4.6 Fire Department

1) Immediately report all spill calls received to the DPW Environmental office, 656-1111.

2) The U.S. Army Fire Chief coordinates with the U.S. Navy Fire Chief for support. The Army Fire Chief is assigned to the Safety Office and can be reached at 656-9540 or 656-1715. Fire station personnel function as first responders, operations level, containing spills/releases of hazardous, oil or unknown substances from a distance to keep from spreading and to protect and minimize exposure to nearby persons, property, and the environment. The Station Chief on duty will serve as IOSC until the spill has been controlled and on-site control has been turned over to the DPW IOSC.

3) Respond to hazardous material or oil spills that cannot be handled locally by the installation tenant, contractor, or IRT until relieved by private spill response.

3) The Fire Station at KMC is manned by Hawaii County personnel. The fire response vehicle is on loan from the National Park Service. The fire station is on National Park Service property leased by the U.S. Army as part of the KMC Recreational Area. Initial spill response is handled by the KMC Fire Department which can only provide limited response. The KMC Directorate of

Public Works KMC Team Supervisor must ensure that all spills are documented and immediately reported to the USAG-HI DPW–ED Office, (808) 656-1111. Because of the distance involved the only U.S. Army personnel that could respond within a reasonable time period are the PTA Fire Department. The USAG-HI DPW-ED Office can only provide limited response initially. Therefore, additional initial response assistance will have to be obtained from local municipalities or qualified contractors.

4) The PTA Fire Station is manned by U.S. Army civilian personnel. They have minimal response capability and materials. USAG-HI DPW-ED Office can only provide limited response initially. Therefore, additional initial response assistance will have to be handled by the PTA DPW Team and may be augmented by local municipalities or qualified contractors.

5) Provide Fire Department personnel with training and equipment necessary to comply with the OSHA standards for response to hazardous substance spills. All Fire Station personnel assigned to Army facilities on Oahu are U.S. Navy employees and are provided training through the Navy Training Coordinator. Spill response supplies are provided through DPW on USAG-HI installations.

6) Maintain agreements and request support from the County Fire Department hazardous materials (HazMat) spill response team(s) if necessary.

1.4.7 Staff Judge Advocate (SJA)

1) Submit and update, as necessary, the names and phone numbers of primary and alternate SJA IRT personnel to the DPW-ED Office

2) Respond to spills at the request of the IOSC.

3) Provide legal assistance as required.

1.4.8 Public Affairs Office (PAO)

1) Submit and update the names and 24 hour emergency phone numbers of primary and alternate PAO IRT personnel to the DPW-ED Office, as necessary.

2) Respond to spills at the request of the IOSC. Provide news releases for the media as detailed in Section 3 and Appendix H.

3) Participate in spill exercises conducted by DPW or other agencies as required under Inter-Agency Agreements (IAG).

1.4.9 Installation Safety Office

1) Submit and update the names and 24 hour emergency phone numbers of primary and alternate Safety personnel and the U.S. Army Fire Chief assigned to the DPW-ED Office, as necessary.

2) Respond to spills at the request of the IOSC.

3) Participate in spill exercises conducted by DPW, DES, or other agencies as required under Inter-Agency Agreements (IAG).

1.4.10 All Other Units and Activities on USAG-HI Facilities

Spill Planning

1) Notify the DPW-ED SPCC Coordinator immediately of any substantial changes in fuel or hazardous substances storage facilities or operational methods that will require modification of this plan, including addition/removal of aboveground storage tanks (ASTs), relocation of motorpools/shops, etc.

2) Participate in the Environmental Compliance Officer (ECO) program administered by the DPW-ED Office. Names of personnel assigned as ECOs must be submitted to DPW. ECOs are required to attend the basic ECO course within 30 days of appointment, and attend annual refresher training thereafter. Information pertaining to policies, training, certification and other guidance documents are available on the DPW website at https://dpwhawaii.army.mil/ECO.

3) Unit ECOs are responsible for ensuring all assigned personnel are familiar with this plan. Each unit must maintain a copy of this plan on site, and develop and maintain site-specific spill SOPs. Units on deployment with equipment that exceeds the total 1,320 gallon storage capacity or hazardous materials must have a qualified ECO as part of the deployment team. The ECO must have all the necessary hazard and cleanup information and adequate spill response supplies when deployed. Should the ECO Certification of a deployed unit ECO expire, the unit commander can submit a waiver request to allow the ECO to attend the 8 hour ECO Refresher Course to the Instructor, Environmental Compliance Training Program, DPW. Refer to the following website for the form: https://dpwhawaii.army.mil/ECO (File Name: ECO Deploy Recert Waiver).

Spill Prevention

1) Operate fuel, oil, and hazardous substance and waste storage and handling facilities in accordance with established spill prevention, control, and countermeasure procedures, as set forth in this plan.

2) Implement all spill prevention operations and maintenance requirements as recommended in this plan.

3) Submit to DPW job requests for repair of containment structures and storage facilities for the storage of oil as required to meet the requirements of this plan.

4) Request guidance from the DPW-ED Office for operating procedures for temporary non-routine handling and storage of oil.

5) Conduct spill response training IAW site-specific spill SOPs, and place emphasis on recent spills.

6) Contractors and tenants working on the USAG-HI installations listed above that do not provide direct support to the Army or USAG-HI are responsible for conducting spill response training IAW with their site-specific SPCCPs.

Spill Response

1) Maintain inventory records to establish the quantity of oil lost in the event of an accidental spill or underground tank/line leak.

2) Purchase and store appropriate sorbent materials, containers, and other spill response equipment for containing spills at the Unit/Activity. Supplies shall be determined based on the type and amount of oils and hazardous substance used/stored, and the type of operations being conducted.

3) Designate a person (usually the ECO) responsible for reporting spills and directing responses to small spills.

4) Report all spills immediately to the DPW Environmental Hotline at 656-1111, and submit written follow-up notification on the USAG-HI Spill Notification Form in Appendix B. The form is also available at the DPW website at https://dpwhawaii.army.mil/ECO (File Name: Spill Report Form). POL spills of less than one gallon, entirely on a concrete surface and immediately cleaned up, are exempt from the written reporting requirement.

5) Tenants, contractors, or other activities not under or directly supporting the Army or USAG-HI are responsible for accomplishing cleanup and regulatory reporting of all spills/releases caused by their operations. Cleanup shall be accomplished in a timely manner and comply with State of Hawaii cleanup guidelines. Tenants/contractors shall obtain contractor support to accomplish cleanup outside their capabilities. Tenants/Contractors shall be responsible for any fines/penalties levied by regulatory agencies resulting from the incident, and shall reimburse USAG-HI for any costs incurred should spills/releases not be cleaned up in a timely manner or to the satisfaction of the DPW-ED.

1.4.11 Housing Office and On-Post Residents

1) Ensure that all accompanied and unaccompanied personnel assigned on-post quarters are instructed on storage and disposal of hazardous materials and how and to whom they will report a release or spill.

2) All on-post residents are responsible for disposing of all hazardous materials prior to vacating government furnished housing. Refer to the DPW website: http://www.25idl.army.mil/dpw/. Click on “Customer Handbook” located on the left side of the page for guidance on household hazardous waste disposal.

2.0 SPILL PREVENTION

2.1 MISSION

Army installations having certain non-transportation related on-shore storage facilities are required by Army Regulation 200-1 to prepare a SPCCP. Sections 112.1 through 112.7 of Chapter 40 CFR provide guidelines for the preparation and implementation of a SPCCP.

The purpose of this plan is to minimize the discharge of oil or hazardous materials to air, land, or water of the United States by United States Army Hawaii Facilities. In the event of a discharge the plan describes the actions to be taken to reduce and mitigate a release of oil or hazardous substances. The locations of the installations addressed in this plan are shown in Appendix A.

This plan identifies engineering controls, operational procedures, and response guidelines to prevent accidental discharges, and to contain and resolve those that occur. Emphasis is placed on prevention through engineering design, periodic inspection, preventative maintenance, and operator training. The plan identifies potential sources of spills and their likely direction of flow and pathway to bodies of water or drainage.

Detailed site-specific data has been collected for facilities storing and using large quantities of petroleum products. The site-specific information is located in an Access database described in Appendix A of this Plan and is organized by installation and building number. The facilities consist of motor pools, maintenance facilities, aviation facilities, bulk storage tanks and fuel distribution points, warehouses, and dining facilities. Data on tenants and contractors on USAG-HI facilities are also included in the database.

2.2 SPCC PLAN PROVISIONS

This section details certain requirements, concepts, and applicability of USAG-Hawaii SPCCPs. Facility specific information, however, will not be presented in this section, but is presented in Appendix A.

2.2.1 General Provisions

2.2.1.1 Planning Thresholds

All units, tenants and contractors on U.S. Army Facilities are subject to SPCC planning and implementation requirements unless the completely buried storage capacity of the facility for POL substances is 42,000 gallons or less of oil and the aggregate aboveground storage capacity of the facility is 1,320 gallons or less of oil.

2.2.1.2 De Minimis Containers

For purposes of threshold calculation, only POL and animal fat/vegetable oil containers that are 55 gallons or greater in size that are available for use or storage, even if they contain only small volumes of POL or animal fat/vegetable oil, must be counted when determining storage capacity.

Containers with storage capacity of less than 55 gallons are exempt from SPCC requirements. However, all activities under the Army and USAG-HI are committed to the safe handling and storing all quantities of POL, animal fat/vegetable oil, as well as hazardous substances, and therefore will provide secondary containment for containers whenever possible. Any request for exception to the secondary containment must be submitted to the DPW SPCC Coordinator. An exception is only temporary and will not be approved if there is a high potential for a release into surface waters.

2.2.2 Definition of Facility

By definition, a "**facility**" can be as small as a single storage tank or as large as a military installation [40 CFR 112.2]. For the purposes of this Plan each separate USAG-HI installation will be treated as a facility.

2.2.3 Guidelines

2.2.3.1 Secondary Containment

Federal regulations require regulated containers (55 gallons or greater) for the storage of oil and hazardous materials be equipped with secondary containment, or equivalent protection as in the case of double walled aboveground storage tanks. When secondary containment is not possible, a contingency plan to prevent a discharge and a strong commitment and an allocation of resources and personnel to prevent a discharge will be made (40 CFR 112.7). USAG-HI policy is that all containers of POL and hazardous substances will be provided secondary containment, capable of containing the entire contents of the largest container or 10% of the total volume of all containers, whichever is greater, and, for outdoor storage, sufficient freeboard to contain precipitation. Any exceptions to this policy must be approved by the DPW SPCC Coordinator in writing.

Drainage valves for secondary containment shall be manual, open-and-closed design; flapper-type drain valves are not authorized.

A release that is contained within the secondary containment (including drip pans) or within the outer shell of a double walled storage tank does not meet the definition of "a release to the environment" and therefore does not have to be reported to DPW-ED or other regulatory agencies. The release shall be immediately cleaned up to prevent overflow and discharge into the environment

Although the Final Rule amending requirements of the Oil Pollution Prevention regulation at 40 CFR 112 exempts mobile refuelers from the sized secondary containment requirements for bulk storage containers, it is USAG-HI policy that mobile refuelers have secondary containment capable of containing 110% of the storage capacity of the tank whenever possible. Any exceptions to this policy must be approved by the DPW SPCC Coordinator. Written request must be submitted, including strong justification for the exception and a copy of the site-specific SOP addressing spill prevention and response procedures to be implemented. Exceptions are not

required for minimum quantities stored in mobile refuelers necessary to maintain and PMCS the vehicle and its components.

Accumulated rainwater in secondary containment will be checked **prior to release of the rainwater**. [40 CFR 112.8(c)(3)] **Only rainwater should be released into the environment and only designated trained personnel shall be authorized to release the rainwater.** Should there be an oil sheen or evidence of possible oil contamination in the water, hydrocarbon (absorbs oil-only) absorbent materials (e.g., pads, pillows, socks) may be used to absorb the oil or oil sheen. Contamination of gasoline or products other than petroleum may be a hazardous waste, and shall be drained/transferred into an approved container. Contact DPW-ED for testing, as needed, and disposal. Secondary containment discharges should be documented on a log sheet similar to the sample provided in Appendix B.

2.2.3.2 Regular Inspections

Containers for the storage of oil will be regularly inspected for wear and corrosion. Although federal requirements do not stipulate a specific inspection schedule, they do state inspections will be conducted in accordance with good industry practice. Inspection guidelines and checklists are presented in Appendix B. Use manufacturer recommendations to set schedules for equipment inspections. Inspection frequency should be adequate to prevent mechanical or material failure due to corrosion or wear from use. Maintain inspection records for 3 years.

2.2.3.3 Personnel Training

General Training: USAG-HI personnel will only perform tasks involving the handling of oil and hazardous materials for which they are properly trained, and are adequately supervised. USAG-HI administers an Environmental Compliance Officer (ECO) training and inspection program, which includes training down to unit level, combined with regular periodic inspections and review at all Army and USAG-HI activities. ECOs are required to provide initial assignment and quarterly spill response training to personnel assigned to their unit/activity. For ECO training schedule, see the following website: https://dpwhawaii.army.mil/ECO (File Name: ECO Training Class).

Installation On-Scene Coordinator (IOSC) Training: Personnel assigned as IOSCs are required to receive the initial 40 hour OSHA Hazardous Waste Operations and Emergency Response Training and a yearly eight hour refresher training.

HazMat Team: The U.S. Navy has assigned HazMat Response Teams to respond to U.S. Army Installations on Oahu. All HazMat Team members meet the requirements of Hazardous Waste Operations and Emergency response. – 29 CFR 1910.120. Installations on the island of Hawaii are supported by County HazMat Teams. Training for these teams is provided by their employers.

Discharge Prevention Procedures [112.7(f)]: Individual units and activities are also responsible to ensure that all oil-handling personnel are trained in the operation and maintenance of equipment available to prevent discharges, discharge procedure protocols, applicable pollution

prevention laws, rules and regulations, general facility operations, and the contents of this SPCCP.

In addition, individual units will:

- Designate one person who will be responsible for discharge prevention efforts (typically the unit ECO).
- Schedule, conduct and document refresher training for oil-handling personnel at least once a year including review and evaluation of any known discharges or failures, malfunctioning components, and/or any new precautionary procedures or measures.

2.3 GENERAL SPILL PREVENTION PROCEDURES FOR SELECTED ACTIVITIES

2.3.1 Introduction

This section addresses spill prevention, control, and countermeasure state and Federal guidelines for all USAG-HI facilities storing or handling fuel, oil, or hazardous substances or wastes. The provisions of this plan must be implemented and enforced at all activities with a potential for discharge into the environment.

In general, Access to the USAG-HI installations covered by this plan is controlled by the installation security and fencing. Access to the installations is generally limited to individuals with military or Department of Defense civilian identification or other civilians on official business.

2.3.2 Spill Containment, Security and Operational Procedures

2.3.2.1 Underground Storage Tanks (UST)

USEPA underground storage tank regulations (40 CFR 280) have specific requirements for the operation and maintenance of underground storage tanks containing petroleum or hazardous substances. The State of Hawaii Title 11-281 HAR "Underground Storage Tanks" describes State of Hawaii requirements for operating and maintaining USTs. In general, 11-281 HAR reflects or exceeds the requirements of the USEPA. Facilities with less than 42,000 total UST storage capacities are not required to have an SPCCP. The AST total storage capacity must still be considered.

USTs will be located inside secure locations (fenced areas, restricted areas and walled enclosures). All tank fill points will be locked except during refilling operations. The keys will be maintained by the Facility Managers and/or the ECOs. USTs shall be inspected daily when in operational use.

2.3.2.2 Aboveground Storage Tanks (AST)

All aboveground storage tanks will have either 1) secondary containment capable of holding the entire contents of the largest tank within the containment area plus an additional ten percent to allow for rain; or 2) dual wall construction providing equivalent protection. Mobile tankers are exempt from this requirement under the Final Rule amending requirements of the Oil Pollution Prevention regulation; however, as a best management practice, it is USAG-HI policy that mobile tankers and fuel pods will comply with the 110% containment requirement.

Materials stored in tanks must be compatible with their construction and intended use. Tanks should be equipped with some form of leak detection. ASTs, including their associated fittings, piping, transfer lines and valves shall be periodically inspected for corrosion, material defects, overfill protection and tested to ensure they are functioning properly. **All piping and appurtenances without secondary containment shall be inspected for leakage prior to, during and after being used.** Leak and integrity testing of buried piping will be conducted at the time of installation or modification. All procedures specified in section 2.2.3.1 of this plan for discharging rainwater accumulated in secondary containment shall be followed.

The DPW AST Program Manager will ensure stationary ASTs storing oil are inspected on an annual basis using the checklist in Appendix B. As part of the annual inspection, above ground piping, valves, and appurtenances will also be inspected. A written record of inspections will be maintained for each AST for at least three (3) years, and shall be available from the DPW-ED Office upon request. DPW will schedule integrity testing for USAG-HI-owned ASTs whenever significant repair or modification of function is required.

In general, all ASTs are equipped either a high liquid level alarm, high liquid level shut off valve, or computerized inventory system. See the Access database for specific tank information.

ASTs will be located inside secure locations (fenced areas, restricted areas and walled enclosures). All tank fill points, flow and drain valves will be locked except during refilling operations. Fuel pump starter controls will be locked in the off position during non-working hours. The keys will be maintained by the Facility Managers and/or the ECOs.

2.3.2.3 Drum Storage

New and used products and wastes are stored in 55 gallon and smaller drums throughout installations. Generally only containers of 55 gallons or greater are required to have secondary containment; however, it is USAG-HI policy to store single wall containers in secondary containment or on containment pallets where possible. Typically, new petroleum products are issued to units in containers of 5 gallons or less; however, some maintenance bays also have a few 55 gallon drums of new material. The most common locations of 55 gallon drums are in Recyclable Material Shop Storage Points (RMSSPs) attached to motor pools and maintenance facilities. RMSSPs are constructed to provide secondary containment and are the best locations for storing drums. Dining facilities are also likely to have 55 gallon drums of used cooking oil. **Since animal, vegetable, and fish oils are now regulated under 40 CFR 112, these drums are also subject to the provisions of this plan**. For drums stored outdoors, strict adherence to the drainage requirements of 2.2.3.1 of this plan shall be followed.

All drums must be stored in secure areas (fenced areas, secure walled enclosures or buildings). ECOs shall inspect all drum storage areas on at least a monthly basis, ensuring tops of drums, secondary containment, and surrounding storage areas are free of oil residue. Dry absorbent shall be used to remove oils from surfaces; pressure washing is not authorized. Granular absorbent is an effective means of removing residual oil from asphalt and concrete surfaces.

All drums must be clearly marked with their contents. Empty drums must be labeled as "empty." Drums shall be in good material condition, and inspected regularly, at least monthly, for defects and corrosion using applicable checklists in the Installation Hazardous Waste Management Plan, or for tenants and contractors using comparable checklists. Worn or damaged drums will be replaced immediately. Material shall be stored only in drums compatible with the material being stored. For storage of new or used petroleum products, only drums with top mounted bungs shall be used. Non-sparking tools shall be used to open and close drums. For used petroleum drums, a log shall be maintained indicating when material begins to accumulate in the drum, and every subsequent addition of material to the drum.

2.3.2.4 Filling and Handling Procedures

Caution shall be exercised at all times while handling petroleum, used oil, cooking oil and hazardous materials or wastes to prevent a harmful discharge to the environment. Personnel should pay particular attention when handling or transferring products near bodies of water or drainage systems. Only personnel who are trained in properly handling POL, or specific hazardous materials, and have had the appropriate Hazard Communication (HAZCOM) briefing in accordance with OSHA guidelines, shall handle the specific material.

Any loading/unloading connections are to be securely capped or blank-flanged when not in service or when in standby service for an extended time. All loading/unloading vehicles are to be inspected prior to filling and departure in order to prevent discharges while in transit.

When significant quantities of POL (greater than 55 gallons), in single or multiple transfers will occur, block all down gradient storm or drainage openings within a 50-foot radius, prior to beginning the transfer. Before beginning transfer operations, have adequate supplies of absorbent materials such as socks, pillows, booms, and pads readily available. These are the best products to use because they are reusable. Drains and openings may be blocked by attaching a cover or by dikes of absorbent booms.

The following procedures should also be followed during tank filling operations:

- Inspect tank truck compartment(s) and hose(s) to ensure that there are is no potential for leaks.
- Ensure that the tank secondary containment valve is in the closed position.
- Place drip pans under connection points and other points with the potential for leakage to occur.
- Use wheel chocks or other system to prevent tank trucks from moving prior to disconnection of transfer lines.
- All tank filling operations should be observed by a trained employee.

If a discharge does occur, stop the transfer and source of the leak so it does not enter a waterway or drain.

2.3.2.5 Motor Pool Complexes and Maintenance Facilities

The Motor Pool Complexes (MPCs) provide storage and maintenance for tactical, construction, and utility vehicles as well as associated equipment such as trailers used by Army and USAG-HI activities. Other field maintenance facilities maintain associated equipment such as fuel bladders and power generators or perform tasks such as jet engine testing and painting that are outside the scope of MPC maintenance. Contractors and tenants also have maintenance facilities. POL and other chemical products used to maintain the vehicles and other equipment are stored at these maintenance shops. Maintenance at various levels includes fluid changes, component replacement, and technical inspections. Used POL and chemical products are stored on site and collected for disposal at regular intervals.

Personnel who normally work in the maintenance shops are selected and trained as Environmental Compliance Officers (ECOs). After receiving training, ECOs are responsible for ensuring compliance with environmental guidelines for maintenance facilities in accordance with U.S. Army, Federal and Hawaii regulations, including complying with best management practices (BMPs) and guidance issued by the DPW Environmental Division (DPW-ED). Units are inspected on a quarterly basis by a DPW-ED representative, given a numerical rating and a pass/fail score, with recommendations to bring them into compliance.

Tactical and military vehicles as well as associated equipment that contain hydraulic fluid and other POL fluids are parked at the MPCs. Standard Preventive Maintenance (PM) checks shall be conducted on all vehicles and equipment daily prior to use to ensure the vehicles/equipment are in good condition and are not leaking. The standard operating procedure (SOP) when parking a vehicle at the motor pool is to place a drip pan underneath the vehicle where small leaks of oil or fluids are likely to occur. Drip pans containing free-flowing oil are regulated as used oil containers and shall be marked “Used Oil”. Oil-only (hydrophobic) absorbent pads lined with an impervious material (such as plastic) may be strategically placed under vehicles/operational equipment likely to leak, especially those containing hydraulic fluid, reducing/eliminating the likelihood of free-flowing oil and possible overflowing into the environment.

All facilities with potential for oil runoff (especially at motorpools and maintenance facilities) are recommended to install hydrophobic oil-absorbing drain inserts which can be positioned inside stormwater inlets to absorb residual oil runoff.

For MPCs and other maintenance facilities where HEMTTs or other refueling vehicles/bladders/trailers are parked, secondary containment as required in section 2.2.3.1 shall be complied with, unless the tanks/containers are empty Additionally, all procedures for discharging rainwater accumulated in the secondary containment shall be followed.

2.3.2.6 Maintenance Bays

Maintenance on vehicles, aircraft and associated equipment can be performed in a maintenance shop or an open area inside an aviation hangar, motor pool maintenance building or other buildings with open areas. DPW, tenants and contractors also have shops that use or perform maintenance tasks on equipment that uses POL and other chemical products. The open areas used for maintenance are referred to as maintenance bays. Maintenance involving fluid transfers is usually performed in maintenance bays. The floor of a maintenance bay should be constructed of an impervious surface. Maintenance bays are required to have fire extinguishers, spill kits, and the necessary tools to safely perform the assigned tasks. Maintenance areas (bays and shops) are generally maintained in a neat manner and are cleaned regularly. Current cleaning standard operating procedures (SOPs) prohibit washing down maintenance bays or shops using water. Spills and stains of POL products and other chemicals shall be removed by placing absorbent materials over the spill and by dry sweeping. These absorbent material can be reused. Every maintenance bay and shop shall be equipped with a broom and have ready Access to spill recovery materials, including absorbent materials and protective clothing.

All facilities with potential for oil runoff (especially at motorpools and maintenance facilities) are recommended to install hydrophobic oil-absorbing drain inserts which can be positioned inside stormwater inlets to absorb residual oil runoff.

On a typical work day maintenance personnel will use various POL and other chemical products and generate similar waste products. These products are stored inside the maintenance bay/shop or in a secure outside area with some form of containment such as a flammable storage locker or a poly containment pallet. All procedures specified in section 2.2.3.1 of this plan for discharging rainwater accumulated in secondary containment shall be followed.

Open new product containers, when not in use, are regularly stored in lockers as or on pallets, as are used POL, chemicals and items such as batteries that contain chemicals (battery acid). Throughout the day the ECO or alternate will supervise the transfer of used products to the RMSSP.

2.3.2.7 Recyclable Material Shop Storage Points

Used POL products, used absorbents and other recyclable chemical products are temporarily stored in RMSSPs for collection. Generally, RMSSPs are constructed on a concrete foundation, with overhead cover, surrounded by a chain link style fence for security. Trench sumps are built into the floor and are typically 6-8 inches deep and 6-8 inches wide and form a storage platform on the center of the floor. Poly containment pallets with a 66 gallon capacity are commonly used as secondary containment and the trench sump serves as tertiary containment for releases that may occur. Used POL products may be stored is various sized containers up to 55 gallon drums. Only 55-gallon drums with top mounted bungs should be used to contain liquids. In some maintenance facilities, polypacks or other containment devices may be designated as an RMSSP; however, they must be clearly marked as an RMSSP. Hazardous Waste shall not be stored in an RMSSP.

DPW-ED has company(ies) under contract to remove all used/recyclable products monthly, or as requested for locations with small accumulation rates. Generally, product pickup should be done no less than once every 90 days. ECOs are required to check the containers monthly for deterioration, corrosion, or other damage.

RMSSPs shall be clearly marked with "Flammable" signs, the names of the points of contact and telephone numbers for the unit primary and alternate ECOs. A fire extinguisher and spill recovery materials shall be positioned in close proximity to the RMSSP, and should be readily Accessible to personnel. Spill materials should not be stored on top of the containers or in a location where spills may contaminate them. The RMSSP shall be kept as clean as practicable at all times. Trench sumps shall be kept free of oil residue, standing water and debris.

2.3.2.8 POL Storage Points and Flammable Lockers

POL storage points are often constructed similar to RMSSPs with trench sumps built into the foundation. Containment pallets are commonly used to store large containers; however container sizes are generally less than 55 gallons. Small size container use is encouraged. All procedures specified in section 2.2.3.1 of this plan for discharging rainwater accumulated in secondary containment shall be followed.

Units are limited in the types and quantities of any given product they may have on hand by their approved Authorized Use List (AUL). DPW-ED's Compliance section maintains the AUL. Refer to the following DPW website for information on your AUL: https://dpwhawaii.army.mil/ECO (File Name: AUL forms). Unit ECOs shall maintain copies of Material Safety Data Sheets (MSDS) for all products stored in the POL storage points. All materials shall be stored neatly, and segregation storage requirements for incompatible and flammable products shall be followed. ECOs should contact the installation Safety Office or DPW-ED for any questions about storage incompatibilities.

Only National Fire Protection Association (NFPA) approved flammable storage lockers should be used to store products such as flammable materials including small quantities of fuel, paints, and other fluids. These lockers are commonly collocated within the POL storage area. Flammable storage lockers are readily identifiable by their bright red or yellow color and by a "Flammable Storage" marking on the front doors of the cabinet. All products shall be stored neatly, and segregation storage requirements for incompatible and flammable products shall be followed. ECOs should contact the installation Safety Office or DPW-ED for any questions about storage incompatibilities. A list of contents may be posted at each locker. MSDSs for the locker contents may be located in a separate documented location.

2.3.2.9 Hazardous Waste Shop Storage Points (HWSSP)

Facilities generating hazardous wastes store them in an area/facility identified as a HWSSP. A HWSSP can be a covered fenced concrete slab, a building or a covered storage container. Most facilities within USAG-HI have HWSSPs that are readily identifiable as bright yellow plastic polypacks (clamshell hutches) approximately five (5) feet wide, three (3) feet deep, and four (4)

feet tall, with built in secondary containment. The polypacks have a clamshell opening and are secured with a padlock. Regardless of the type of HWSSP in use the following apply:

1) A list of materials inside the HWSSPs shall be maintained in the storage unit and at a separate designated location.

2) The HWSSPs are designed for and shall be used only for temporary storage until the waste can be transported to the appropriate Transfer and Accumulation Point (TAP). The maximum aggregate amount of HW that can be stored at a HWSSP is 55 gallons. Any amount in excess of the 55 gallons must be transferred to the TAP within 72 hours. Refer to the IHWMP for information on hazardous waste management. The IHWMP and other guidance documents are Accessible on the DPW website at: https://dpwhawaii.army.mil/ECO.

3)Typical hazardous wastes often stored in the units include used/damaged lithium batteries, products that have passed their shelf-life, products in damaged/deteriorated containers, and various solvents and adhesives that are no longer usable for their intended purpose. All waste products shall be stored neatly, and segregation storage requirements for incompatible and flammable products shall be followed. ECOs should contact the installation Safety Office or DPW-ED for any questions about storage incompatibilities

4) Containers in HWSSPs are generally 15 gallons or less in size; however, the only size requirement is that the container be 55 gallons or less.

5) HWSSPs shall be inspected at least weekly by the unit ECO.

6) All procedures specified in section 2.2.3.1 of this plan for discharging rainwater accumulated in secondary containment shall be followed.

2.3.2.10 Lube Pits, Lube Racks, and Maintenance Platforms

Originally designed for maintenance activities including lubrication of vehicles and oil changes, these structures are typically either raised platforms or pits to provide personnel Access to the underside of vehicles. Generally the platforms are connected to an oil-water separator and storage tank to collect oily runoff or releases from maintenance activities. The existing SOP limits use of these structures to visual inspection only. Above ground storage tanks associated with these platforms shall no longer be used, as their originally intended use is no longer an allowable work practice. All used POL is stored in RMSSPs until collected. It should be noted that many maintenance platforms and lube pits located in motorpools are no longer used for that purpose. The waste storage tanks have been removed or disconnected.

2.3.2.11 Mobile Refuelers and Transportable Fuel Storage Tanks/Bladders

Several facilities maintain mobile refuelers and fuel storage tank trucks/bladders (with more than 55 gallon capacity) used for refueling military vehicles and aircraft, and for establishing fuel points during tactical operations and exercises. **When in garrison and not in active use, it is USAG-HI policy that tanker trucks and bladders shall be stored empty.** HEMTTs are

considered empty when they contain 300 gallons or less fuel in their storage compartment. All refueling operations on USAG-HI installations using mobile refuelers and fuel storage tanks/bladders must be approved by DPW-ED. Requests for waivers to this policy must be submitted to the DPW SPCCP Coordinator, including strong justification for the waiver and an SOP including a map and a checklist to ensure all proper spill prevention and response measures are followed, and fueling personnel are properly trained in spill notification and unit response protocols prior to establishing a fueling point.

Vehicles and fuel storage tanks that contain fuel shall be parked/placed within a secondary containment. Tanker trucks and fuel storage tanks/bladders that carry fuel only when operating as tactical fuel points shall be emptied of fuel prior to returning to garrison. Spill response and recovery equipment and supplies shall be located on each vehicle or by each storage tank/bladder and be readily available to refueling personnel. When establishing a tactical refueling point, tanker trucks and fuel storage tanks/bladders shall be parked/placed inside secondary containment units. Secondary containment can be one of three types. They are:

1) An imperious cover placed inside a soil berm. The cover must be made of a material that is compatible with fuel and strong enough so that it will not tear when the vehicle drives on or off. This is the least desirable containment and should only be used under emergency situations and must be approved by DPW-ED.

2) A collapsible containment berm. The berm must be made of a material that is compatible with fuel and strong enough so that it will not tear from rocks and sharp objects stuck in treads when the vehicle drives on or off. It is recommended that ground mats be used to cushion and protect truck berm on rough terrain. A fuel drain filter should be attached for draining the containment unit of water and fuel.

3) Secondary containment unit made of metal. Metal containment berms are useful for long term parking of refueling vehicles/tanks. They are expensive and are made of large units which must be bolted together. A fuel drain filter should be attached for draining the containment unit of water and fuel.

All procedures specified in section 2.2.3.1 of this plan for discharging rainwater accumulated in secondary containment shall be followed.

Drivers and other personnel operating tanker trucks are required to have Fuel Handlers Certification . Each organization is responsible for certification of their fuel handlers. Standard training consists of the 40-Hour Fuel Handler Certification Course which encompasses safe fuel handling and spill response training

2.3.2.12 Compressed Gas Cylinders

Some MPCs and maintenance shops currently store compressed gases such as oxygen, acetylene, propane, and refrigerant cylinders. Cylinders come in different sizes and shapes. All cylinders shall be stored safely in accordance with OSHA requirements; protected from the weather, stored and secured upright, be capped and clearly marked as to the cylinder's contents. Empty

cylinders should be clearly identifiable as empty. Chains or other holding devices must be strong enough so as to break should the cylinder tilt, be placed approximately two thirds from the bottom of the cylinder to prevent it from falling over the device and will not be placed around the cylinder valve. Small cylinders stored inside cabinets will not be placed on a shelf with other chemical or POL products. Units no longer using cylinders should take appropriate steps to have the cylinders removed from their inventories. Contact DPW-ED for current guidance.

2.3.2.13 Gas Cans

Five (5) gallon metal containers (jerry cans) used for temporary storage of diesel, and gasoline for field operations have mostly been phased out and replaced by plastic cans. Current SOPs require that only empty fuel cans be returned to the MPC after field operations. It is recommended that unused fuel be used to top off vehicle fuel tanks. Cans containing fuel shall be stored in a secure, marked storage point with adequate secondary containment. The unit ECO shall inspect fuel cans regularly to ensure they are secure and empty. All procedures specified in section 2.2.3.1 of this plan for discharging rainwater accumulated in secondary containment shall be followed.

2.3.2.14 Wash Racks, Sediment Basins, and Oil Water Separators

MPCs are equipped with wash racks for washing military vehicles and other organizational equipment. Typically, the wash rack is a concrete pad sloped or channeled to drain into a sediment or settling basin. Military vehicles and equipment are washed with cold water and detergents and soaps listed on an approved list of cleaners. The list of approved cleaners is posted on the ECO link of the DPW website at http://dpw/hawaii.army.mil/ECO. Some oil-water separators (OWSs) are connected to a holding tank or underground storage tank which collects the fuel/oil. In some cases the OWS may be connected directly to the sanitary sewer system. Generally the OWS are set to discharge to the sanitary sewer when the washing spigots are turned on. In cases where the valves cannot be adjusted to discharge to the sanitary sewer, outflow is permanently set to flow to the sanitary sewer. Contractors perform routine oil-water separator maintenance. The contractor removes product collected in the holding tank on a scheduled maintenance period: twice a year all sediment is removed from the settling basin and drains. The OWSs at Schofield Barracks, Wheeler Army Airfield, Helemano Military Reservation, and East Range have been transferred to a contractor, who is responsible for properly maintaining and operating the OWSs in accordance with their NPDES permit. The servicing Wastewater Treatment Plant at Wheeler Army Airfield, operated by Aqua Engineers, is responsible for contracting this service. The OWSs at Fort Shafter and TAMC are under DPW maintenance contract. An inventory of OWSs serviced by Aqua Engineers is provided as Appendix I.

2.3.2.15 Oil Filled Electrical Transformers

Oil cooled pad-mounted electrical transformers are in use throughout the installations of USAG-HI. Pad-mounted transformers typically have a coolant capacity ranging from 55 to several hundred gallons. Transformers are cooled with a non-PCB (polychlorinated biphenyls) mineral oil solution.

Typically, USAG-HI discharges from pad-mounted transformers have been small quantities, resulting from slow corrosion of transformer components from weather exposure. Slow discharges tend to be absorbed rapidly into the soil surrounding the transformer pad, and have minimal potential of entering waterways or storm drainage systems. Catastrophic failure and release of the full contents of a transformer is likely only in the event of a vehicular collision; however most transformers are located away from roadways or are protected by collision obstacles or curbing.

Most leaks result from corrosion underneath the oil holding tanks and are only detectable by visible staining on the exterior of the tanks. Over time the oil will migrate to the transformer pad and into the soil surrounding the pad. The oil may also leak from corrosion of the transformer cooling fins.

Aside from a few exceptions, transformers are not equipped with secondary containment structures, dikes, or berms. Based on consultations with facility engineering personnel, other military installations, and commercial electrical contractors, the installation of secondary containment was determined to be unwarranted and impractical. USAG-HI has over 700 oil-filled pad-mounted transformers. Any structure designed to retain spills would also retain rainwater; continual and immediate drainage would be required to prevent the health hazards of standing water and the potential for overflow. Continual draining of hundreds of transformers, especially during the rainy season, would require several full time personnel whose sole function would be to drain containments. In general, installing a containment system would involve removing and replacing the transformer and pad. Moreover, the engineering section expressed concerns that retaining systems would cause water to back up and damage the electrical systems. Since early detection is the key to minimizing potential environmental pollution caused by leaking transformers, USAG-HI is committed to conducting regular inspections of all pad-mounted transformers. As a minimum, exterior inspections for leakage, corrosion, damage, and defects shall be conducted at least annually by the servicing High Voltage Shops using the checklist in Appendix B. Inspectors shall sign the inspection checklists. Maintenance shall be performed when noted during inspections, and as recommended by the transformer manufacturer. Inspection records shall be maintained for at least three years.

When a leak is discovered at a transformer site, DPW-ED shall be immediately notified. Before responding to leaks associated with transformers or electrical equipment, work shall be coordinated with the responsible High Voltage Shop. No untrained personnel shall make any assumptions or take any actions at electrical facilities without the direct supervision of authorized electrical personnel.

When a leak is discovered, responsible personnel shall identify the source and stop the leak whenever possible. If unable to stop the release, the transformer will be replaced immediately if a suitable replacement is in stock. If not in stock, steps shall be taken to minimize oil release into the environment, and procurement of a replacement will be initiated pending funding availability.

2.3.2.16 Convoys of Military Vehicles

Tactical military vehicle convoys traveling off USAG-HI installations shall be equipped with spill recovery equipment and supplies to respond to small oil, radiator, or hydraulic fluid leaks. At a minimum, supplies shall include drip pans, absorbent pads, socks/booms, and granular or other loose absorbent, durable plastic bags, broom, shovel, and container for the used absorbent. Absorbent material can be reused at the unit's MPC/maintenance bay. Leaks and spills are likely to be small and non-reportable but should be recovered on the spot and in a timely fashion. Cleanup for spills outside USAG-HI installations are the sole responsibility of the unit.

If a spill occurs, care shall be exercised to prevent/minimize release onto soil or into drainage systems by taking the following steps:

1) Park the leaking vehicle/equipment over concrete or asphalt surface whenever possible and safe to do so.

2) Place drip pan under the leak. Alternatively, place absorbent pads over impervious surface (e.g., plastic bags) to absorb the leak.

3) Immediately block off pathways to soil and drainage systems with socks/booms.

3) Clean up the spill with absorbent material.

All transportation-related spills of Army and USAG-HI units and activities shall be reported to the Installation Transportation Officer (ITO) at 656-4963.

2.3.2.17 Dining Facilities

Due to the inclusion of animal, vegetable, and fish oils in the 40 CFR 112 regulation, dining facilities handling and storing cooking oils are also subject to the requirements of this plan. Used cooking oil at dining facilities is typically stored in appropriate containers with capacities of 55 gallons or less. Private contractors are used to pick up and transport the used cooking oil to designated off-post disposal sites. Cooking oil disposal records are maintained at the dining facilities. All containers shall be clearly labeled with the contents of the container and shall be stored in a secured area. For containers stored outdoors, facilities will adhere to the requirements for secondary containment and drainage stated in section 2.2.3.1 of this plan.

The dining facilities are also required to participate in the ECO program. ECOs will schedule and conduct appropriate training for dining facility personnel on handling and storing oil and spill prevention and response. In addition, the dining facility ECOs will be responsible for conducting regular inspections of all cooking oil storage containers for defects, damage or oily residue. Inspection records shall be maintained at the dining facilities.

Most of the dining facilities are equipped with grease traps for removing grease and oil before entering the sanitary sewer system. Grease traps at Schofield Barracks, Helemano Military Reservation, Wheeler Army Airfield, and East Range are maintained by a contractor. An inventory of contractor-maintained grease traps is provided as Appendix I.

3.0 CONTROL AND RESPONSE, INSTALLATION SPILL CONTINGENCY PLAN

3.1 MISSION

The Installation Spill Contingency Plan (ISCP) establishes responsibilities, duties, procedures, and resources to be employed to contain, mitigate, and clean up petroleum product and hazardous substance spills on United States Army installations in Hawaii. It has been developed and implemented in order to minimize hazards to human health and the environment in the event of fires, explosion, or releases of petroleum, oil, or lubricant (POL) products to the environment.

Federal Regulations require activities that use petroleum products or hazardous substances, or generate hazardous wastes, to develop contingency plans to respond to spills of these materials. The U.S. Department of Homeland Security (USDHS) has developed and administers a National Incident Management System (NIMS). NIMS provides a consistent nationwide template to enable all government, private-sector, and nongovernmental organizations to work together during domestic incidents. Information about NIMS can be found at http://www.fema.gov/nims/. DHS has developed a National Response Plan which forms the basis for how the federal government will coordinate with state, local and tribal governments and the private sector during the response to a national incident. These programs are administered under the Federal Emergency Management Agency (FEMA). The Director of FEMA reports directly to the Secretary of Homeland Security. The FEMA Regional NIMS Coordinator for Hawaii is located in Oakland, CA.

The following statutes, Presidential Directives and regulations address contingency planning and reporting requirements:

- Army Regulation 200-1, Environmental Protection and Enhancement, 21 Feb 1997
- Title 40, Code of Federal Regulations, Part 300, National Oil and Hazardous Substance Pollution Contingency Plan
- Homeland Security Presidential Directive-5: The National Incident Management System (NIMS), 28 February 2003
- Homeland Security Presidential Directive-5: The National Response Plan, updated May 25, 2006
- Public Law 96-510, CERCLA of 1980 and the Superfund Amendments and Reauthorization Act (SARA) of 1986
- RCRA Regulations, Title 40 Code of Federal Regulations Part 265, Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities; Part 262, Standards Applicable to Generators of Hazardous Wastes; Part 280, Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks
- Title 40 Code of Federal Regulations Part 110, Discharge of Oil

- State of Hawaii Emergency Alert System (EAS) Plan
- Title 11-451 Hawaii Administrative Rules (HAR), The State Contingency Plan

3.2 RESPONSIBILITIES FOR SPILL RESPONSE

3.2.1 Introduction

All units and activities on USAG-HI installations handling oil in their daily operations shall be familiar with the information contained in this plan for its successful execution. Furthermore, these organizations shall provide basic spill prevention and response training to their personnel on an annual basis.

For discharges that enter navigable waters, the The National Response Center (NRC) must be immediately notified. The NRC is the sole federal point of contact for reporting oil and chemical spills under the National Oil and Hazardous Substances Pollution Contingency Plan. The NRC can be contacted at 1-800- 424-8802 or (202) 267-2675. The NRC website is: www.nrc.uscg.mil/

Under NIMS, the State Emergency Response Committee (SERC) and the Local Emergency Planning Committee (LEPC) must be notified of all reportable spills. The State SERC is the Department of Health; on the island of Oahu, the Honolulu LEPC is the Department of Emergency Management. Phone numbers for these organizations are provided in Table 3-4. There are two HazMat units on the island. HazMat 2 is located in the Kapolei area near the entrance to Campbell Industrial Park and serves the western half of the island. HazMat serves downtown Honolulu and the other half of Oahu.

For spills caused by the Army or USAG-HI on USAG-HI installations, reporting will be accomplished by the DPW-ED Office. Tenants/contractors are responsible for reporting spills caused by their operations.

The provisions of this plan are to be carried out immediately in the event of an emergency or other situation that threatens human health or the environment.

3.2.2 Categorizing and Classifying Spills

WARNING: When a spill or leak of an unknown material or fluid is discovered, immediately contact the installation Fire Department. If there is any reason to suspect the discharge may have been deliberate or the result of an act of sabotage or terrorist activity, inform the Fire Department when reporting the spill; the Fire Department will notify the Installation Operations Center (IOC) at 655-8763/4/5 as needed. Do not attempt to recover the spill. Leave the area immediately, request further guidance from the Fire Department, and report the spill to DPW-ED.

The most common causes for spills are operator error and equipment failure. ALL PERSONNEL ARE RESPONSIBLE FOR PREVENTING SPILLS/RELEASES. Performing routine inspections and maintenance, training personnel to follow existing work procedures, implementing best management practices, and fostering an atmosphere of attention to detail will greatly reduce the likelihood of spills from occurring. All spills **shall be** immediately reported upon discovery to the DPW-ED Office at 656-1111.

When notified of a discharge or spill, the designated unit/activity Spill Coordinator shall determine the appropriate level of response and dispatch or request the necessary resources. Successful resolution of a spill event largely depends on prompt appropriate action. This plan discusses minor and major spills: minor spills typically being handled by the unit, tenant, or contractor; major spills requiring assistance from IRT, contractor support or other emergency response personnel.

3.2.3 Minor Spills

3.2.3.1 What Are Minor Spills?

1) For the purposes of this plan and as a general guideline, minor spills are those releases of oil, paints and other substances that are 1) stored and used at facilities, 2) that can be readily cleaned up by unit personnel with available equipment, and 3) that do not require specialized recovery techniques or advanced personal protective equipment. Report all spills immediately to the DPW-ED Office.

2) Minor spills involve small quantities of petroleum or cooking oil (less than 25 gallons), or paints and hazardous substances that do not require advanced personnel protective equipment, released indoors, to the ground, or to paved areas. Minor spills also include spills less than the reportable quantities (see Appendix C).

3) If there is any question regarding if the spill is a major or minor spill, assume the spill is a major spill.

4) All minor spills will be immediately cleaned up the same day the release is discovered whenever possible. A minor spill of POL not cleaned up within 72 hours becomes a major spill and must be reported to the State and the LEPC.

5) Releases of any amount of oil into water bodies or drainage systems, including storm drains and swales with the potential to empty into nearby streams, shall be considered as major spills due to their potential environmental impact and the need for reporting releases of certain oil and hazardous substances to regulatory agencies.

3.2.3.2 Who Cleans Up Minor Spills?

Minor spills are cleaned up by the unit/activity, tenant, or contractor that caused the spill.

Although in some instances DPW-ED may oversee the cleanup, cleanup of minor spills are not the responsibility of the USAG-HI IRT.

Prompt cleanup actions, including reporting and follow-through are essential. Any amount of oil released to the environment which is less than 25 gallons, but is not contained or cleaned up within 72 hours must be reported to the State and the Local Emergency Planning Committee (LEPC).

1) Each activity, tenant, or contractor using or storing petroleum, fuel, or cooking oil, hazardous substances, or hazardous wastes will designate a spill coordinator and an alternate that will be responsible for spill response and reporting. The spill coordinator, generally the ECO, will be identified to all personnel in the work area, and listed conspicuously on official bulletin boards.

2) The ECO will be responsible for coordinating and overseeing responses to minor spills, and calling the point of contact listed in Table 3-1. The ECO shall have a Memorandum of Appointment by the Unit Chain of Command, and attend the ECO training within 30 days of appointment. For a schedule of ECO courses, see https://dpwhawaii.army.mil/ECO (File Name: ECO Training Class). Contractors and tenant units should contact DPW-ED with questions regarding training requirements for their designated ECOs.

TABLE 3-1. Points of Contact to Activate IRT

For faster service, all spills will be called in to the Environmental Division Spill Response Line. Primary POCs will be contacted by Environmental Division personnel or Work Order desk clerk.

Title	Directorate/Activity	Location and Telephone Number
DPW Environmental Division Spill Response Line (M-F - 08:00 – 16:00)	DPW	**PH: 656-1111** 948 Santos Dumont Ave, 3rd Floor, WAAF
Alternate DPW Emergency Spill Response Line – Work Order Desk (After Duty Hours)	All spills	947 Wright Ave, 1st Floor, WAAF PH: 656-1275
PRIMARY POCS:		
Chief, Compliance/ Pollution Prevention Branch	DPW	948 Santos Dumont Ave, 3rd Floor, WAAF PH: 656-5301
Emergency Planning and Community Right-to-Know Act Program Manager	DPW	948 Santos Dumont Ave, 3rd Floor, WAAF PH: 656-5411
Hazardous Waste Program Manager	DPW	948 Santos Dumont Ave, 3rd Floor, WAAF PH: 656-7001

3.2.3.3 How Are Minor Spills Cleaned Up?

See Appendix D of this Plan.

3.2.4 Major Spills

3.2.4.1 What Are Major Spills?

1) For the purposes of this plan, major spills include any spill/release of petroleum oil, fuel oil, or cooking oil more than 25 gallons. It also includes any spill that exceeds the reportable quantities of items listed in Appendix C.

2) Any amount of an oil, fuel, hazardous substance, or hazardous waste that enters or has the potential to enter a stream, lake, river, canal, wetland, bay, ocean, storm drain, drainage ditch, or sewer manhole. An oil sheen on any body of water warrants investigation to determine if a release/spill has occurred.

3) Any amount of oil, fuel, cooking oil spilled/released in the environment not cleaned up within 72 hours.

4) Any spill considered by the IOSC to be beyond the cleanup capabilities of activity personnel or equipment due to the size or nature of the spill.

5) Suspected leaks from underground storage tanks or piping that are discovered from discrepancies in inventory record.

6) Any leak from a transformer that enters the soil is a major spill if the oil contains PCBs.

Table 3-2. Installation Response Team (IRT) Members

Title	Directorate/ Activity	Location and Telephone Number
INSTALLATION ON-SCENE COORDINATORS (IOSC)		
Chief, Compliance/ Pollution Prevention Branch	DPW	948 Santos Dumont Ave., 3rd Floor, WAAF PH: 656-5301
Hazardous Waste Program Manager	DPW	948 Santos Dumont Ave., 3rd Floor, WAAF PH: 656-7001
Emergency Planning and Community Right-to-Know Act Program Manager	DPW	948 Santos Dumont Ave., 3rd Floor, WAAF PH: 656-5411
Clean Water Program Manager	DPW	948 Santos Dumont Ave., 3rd Floor, WAAF

Title	Directorate/ Activity	Location and Telephone Number
		PH: 656-3105
Drinking Water, Air Pollutants Program Manager	DPW	948 Santos Dumont Ave., 3rd Floor, WAAF (Vacant)
Underground Storage Tanks Program Manager	DPW	948 Santos Dumont Ave., 3rd Floor, WAAF (Vacant)
Asbestos, Lead Paint, PCBs Program Manager	DPW	948 Santos Dumont Ave., 3rd Floor, WAAF (Vacant)
DPW POCs		
DPW Hazardous Waste Transfer and Accumulation Point (TAP) Manager	DPW	Bldg. 6040, Schofield Barracks, East Range PH: 656-0866
Environmental Support Section, Engineering Branch	DPW	Bldg. 2624, Schofield Barracks PH: 655-0584
Supervisor, Maintenance & Repair Branch	DPW	Bldg. 2624, Schofield Barracks PH: 655-0592/656-4321
Supervisor, Schofield Barracks Maintenance & Repair Section	DPW	Bldg. 2624, Schofield Barracks PH: 655-0580
Supervisor, Fort Shafter Maintenance & Repair Section	DPW	Bldg. 346, Fort Shafter PH: 438-1325
Chief, Engineering Plans & Services Division	DPW	572 Santos Dumont Ave, WAAF PH: 656-2419
Operations Officer	DPW	947 Wright Ave., WAAF PH: 656-1750
Lead, Contract Performance Evaluator, Contracts Branch	DPW	Bldg. 113, WAAF PH: 656-1410 ext. 2042
Cultural Resource Manager	DPW	572 Santos Dumont Ave, WAAF PH: 656-6790
Chief, Purchasing & Construction Div, Regional Contracting Office-HI	RCO-HI	Bldg. 520, Fort Shafter PH: 438-6535 ext. 136
ADDITIONAL ACTION OFFICERS		
Hazardous Waste Program Manager	DPW	656-7001
HMCC Contracting Officer Representative	DOL	656-2381
Range Officer, Range Control	G-3 25th ID	655-1404

Title	Directorate/ Activity	Location and Telephone Number
Assistant S-4	45th CSG	655-9089
Chief, Operations Division	TAMC	224-2350 Cellular
Logistics Management Officer	POD	438-8316
Environmental Manager	9th RSC	438-1600 ext. 3247
Safety & Security Officer, Hawaii Exchange	AAFES	423-8815
Battalion XO	65th Engineer BN	655-2881
Battalion XO Staff Duty	84th Engineer BN	655-6533 655-2895
FIRE DEPARTMENTS		
Schofield Barracks, Wheeler Army Airfield, Helemano Military Reservation, Fort Shafter, TAMC, Aliamanu Military Reservation, Fort DeRussy		471-7117 (Fort Shafter) 911
Pohakuloa Training Area		969-2441
Kilauea Military Camp		967-8377/8378
MILITARY POLICE		
Schofield Barracks, Wheeler Army Airfield, Helemano Military Reservation		655-7114 655-0911 (Schofield) 656-0911 (Wheeler)
Fort Shafter, Tripler Army Medical Center, Aliamanu Military Reservation		438-0911
Fort DeRussy		438-2650
Pohakuloa Training Area		969-2425
Kilauea Military Camp (Night Security)		967-8368
AMBULANCE		
Schofield Barracks, Wheeler Army Airfield, Helemano Military Reservation		911
Fort Shafter, Tripler Army Medical Center, Aliamanu Military Reservation		911
Fort DeRussy		911
Pohakuloa Training Area		969-2433
Kilauea Military Camp		911
SUPPORT STAFF:		
Staff Judge Advocate		438-2845/6722 655-4884
Installation Fire & Safety Officer		656-1331/0616 655-6755
Director of Health Services (Occupational Health Clinic)		433-8693 and 433-8390
Public Affairs Office		655-2918

Title	Directorate/ Activity	Location and Telephone Number
USAG COMMUNITY DIRECTOR'S OFFICE		
Schofield Barracks, Wheeler Army Airfield, Helemano Military Reservation		655-0497
Fort Shafter, Tripler Army Medical Center, Fort DeRussy		438-6996
Pohakuloa Training Area, Kilauea Military Camp		969-2400/2407

3.2.4.2 Who Cleans Up Major Spills?

1) Major spills will be managed and/or cleaned up by the USAG-HI IRT. However, common sense and prompt spill containment and emergency response in all situations should be practiced when it is safe to do so. A spill contractor will be used whenever the spill is outside the capabilities of in-house support. A copy of all spill response contracts will be maintained by the DPW SPCCP Coordinator.

2) In some instances of spills of large quantities of POL or where excavation is required, the responsible unit may still be able to perform recovery of the spill but shall be supervised by the DPW Environmental Office.
3) For major spills at Pohakuloa Training Area and Kilauea Military Camp, DPW IOSCs will provide guidance and support whenever possible and will make the necessary agency notifications. Assistance from a spill contractor will be used whenever the cleanup requirements exceed the capabilities of in-house support. A copy of all spill response contracts will be maintained by the DPW SPCCP Coordinator.

3.2.4.3 How to Activate the IRT In the Event of a Major Spill?

Refer to section 3.4.1 for notifying the IRT. The IOSC will activate the IRT if necessary upon receiving notification of a major spill.

3.2.5 Installation Response Team (IRT)

1) The IRT is tasked with spill containment, clean up, and site restoration, until a stable condition is reached for all spills that cannot be readily handled by the personnel and/or organization directly responsible for the spill.

2) The DPW IOSC supervises the IRT. Members of the IRT are listed in Table 3-2.

3) DPW Environmental has the responsibility under NIMS to contact the NRC for any oil or chemical spills in the U.S. and territorial waters. DPW and the IRT follow the guidelines for management of spills developed under the Incident Command System (ICS). The ICS is structured to facilitate activities in five major functional areas: **command, operations, planning logistics, and finance and administration.** The ICS is a standardized on-scene management concept designed to allow responders to adopt an integrated organizational (agencies other than

the U.S. Army) structure when the complexity of an incident exceeds in-house capabilities without being hindered by jurisdictional boundaries. The NRC website is: www.nrc.uscg.mil/

3) Units of the IRT are responsible for mobilizing and assembling promptly with the necessary materials and equipment at the location designated by the IOSC. The containment and clean up of the spill shall have priority over all DPW efforts.

4) The IRT shall participate in a simulated spill event training exercise on an annual basis. The IRT members shall receive formal training and refresher training as per 29 CFR 1910.120. Exercises using an integrated response force (U.S. Army, other DoD agencies. Federal, state and local agencies will be developed and conducted by the Directorate of Emergency Services (DES) to test the ICS and Support Agreements. Documentation of the training will be maintained by the SPCC Coordinator.

5) The IRT will conduct all emergency responses in accordance with OSHA regulations governing health and safety practices for emergency operations at hazardous waste sites except when dealing with non-hazardous materials. The Installation Fire and Safety Office will ensure that proper OSHA procedures are practiced by monitoring response activities.

6) Specific responsibilities for IRT members and support functions are described below.

3.2.5.1 Installation On-Scene Coordinator (IOSC)

The IOSC is responsible for managing the spill response effort. The designated IOSCs are listed in Table 3-2. The IOSC will:

1) Ensure that reportable spills are reported immediately to the USEPA, U.S. Coast Guard, the State Emergency Response Commission (SERC), the Local Emergency Planning Committee (LEPC), or the Pacific Region Office (PARO), as required by regulation. Contractors and tenants are responsible for reporting spills for which they are responsible. For spills suspected of being classified as a serious incident in accordance with AR 190-40, Serious Incident Report, immediately notify the DPW Operations Officer.

2) Maintain a current list of resources available for spill contingencies. Request construction equipment and vehicle support from military units, via the DPW Operations Officer. Resources of other non-Army agencies, along with telephone numbers, are included in Table 3-3.

Table 3-3. Other DoD Organizations with Spill Response Capabilities

Organization	Telephone No.
COMNAVBASE	471-8481
Base Civil Engineer Office, Hickam AFB	449-1660
NAVFAC (PWC) Cleanup Services	474-2446 471-9588 x321
Navy OSC	743-4689
SPILL HOTLINE NUMBERS	
National Response Center	800-424-8802
CHEMTREC	800-424-9300 800-262-8200
CERCLIS Hotline	703-538-7234
EPA Emergency Planning and Community Right-to-Know	800-424-9346
RCRA/UST Superfund	800-424-9346
TSCA	202-554-1404
CFC's (Ozone Protection Hotline)	800-296-1996
Air RISC Hotline	919-541-0888
Pesticides Information	800-858-7378
General Environmental Questions (Construction Engineering Research Lab, U.S. Army R&D Center, Environmental Processing Branch)	800-USA-CERL ext. 5424
Superfund Hotline	1-800-231-3075

3) Designate a location for an installation response operations center at each installation that will be used in the event of a major spill.

4) Identify available communications equipment that can be used during an emergency (such as Military Police radios, cellular telephones, etc.). Electronic communication and testing equipment must be intrinsically safe for use in explosive atmospheres.

5) Maintain a list of potential sources of spills at USAG-HI installations, including the capacity, type of substance stored, and remarks on relative risk of spills. Appendix A contains a list of current oil or hazardous substances/wastes that are potential sources of spills or leaks and complete inventory reports can be obtained from the DPW EPCRA program manager.

6) Identify water resources to be protected in the event of a significant spill. First priority resources include drinking water sources, which are presently all sub-surface. Second priority resources include sensitive streams and navigable waters.

7) Serve as a primary point-of-contact with other agencies to provide Army resources for assistance in Regional Response Plans for clean up or containment of non-Army spills. Initial request from outside agencies for Army assistance will be through the Director of Emergency Services, USAG-HI. Appendix E provides guidance when Army assistance is requested by the Regional Response Team, or when there is imminent danger to life and property requiring Army action to be taken for a non-Army spill.

8) Schedule/attend a simulated spill event annually. Appendix F establishes procedures for conducting the annual spill response exercise. The DES conducts annual large-scale anti-terrorism Chemical, Biological, Radiological, Nuclear exercises.

9) Maintain a library of reference materials pertinent to the ISCP. These materials should include Material Safety Data Sheets, emergency response resource information, general information on chemicals, etc.

10) Procure and maintain a supply of absorbent materials for absorbing spills and necessary equipment for spill response at IOSC installation.

11) Maintain records pertaining to major and minor spill events and response actions.

3.2.5.2 Responders at Remote Installations

1) For major spills at Pohakuloa Training Area, and Kilauea Military Camp, DPW IOSCs will provide guidance and support whenever possible and will make the necessary agency notifications. A spill contractor will be used whenever outside the capabilities of in-house support.

2) Spill responders will keep the DPW IOSC apprised of cleanup actions.

3.2.5.3 DPW Unit

1) The unit will respond to spills as directed by the DPW IOSC, within their capabilities.

2) Mobilization responsibilities and procedures are contained in DPW SOP Number IMPC-PWE-C No. 300, Notification and Initial Mobilization for Spills of POL, Hazardous Materials/Waste, or Air Pollutants and Wastewater.

3) The DPW Unit will only respond to spills where advanced Personal Protective Equipment is not required, and will respond to spills under the direction of the IOSC.

3.2.5.4 Fire Department

1) The Fire Department will respond to spills and releases of unknown substances. The responding Fire Chief will notify the Installation Operations Center (IOC) at 655-8763/4/5, as needed, based on the gravity of the incident, and if the incident may involve terrorist activity or CBRNE support is required,

2) Where there is a threat of fire, the Fire Department will immediately respond to an oil or hazardous substance spill in accordance with established procedures. The Fire Department will also respond at the first responder operations level to control a spill to keep it from spreading and to incidents where entry of oil or hazardous substance into a storm drain or waterway is imminent. The Fire Chief or his representative will assume the duties of the **Incident Commander**, directing the incident response operations and will activate the Incident Command System (ICS) as needed, based on the size and nature of the incident. The Fire Chief will coordinate operations with the Military Police to secure the area, if needed. After threats to life and property are eliminated and the spill in under control, command of the incident is transferred to the DPW IOSC. The Fire Chief will also provide technical assistance to the IOSC with respect to the response to and handling of combustible or flammable substances**.**

3) The Fire Department will also respond **to major spills that cannot be expeditiously handled by organizations that caused the spill or the IRT**. After arrival of a private spill contractor, the command of the incident is transferred to the IOSC.

4) The Fire Department will make available fire department personnel with protective clothing and equipment (e.g., SCBA) under its control. It will direct the emergency dispatch operator to obtain emergency medical services (if required) and call in the spill to the IOSC, if these actions have not already been accomplished. The US Army Fire Chief will develop and maintain agreements for support by the City and County Hazardous Material Team.

5) For spills at PTA and KMC, the Fire Department will respond at the first responder operations level, containing the spill from a distance to keep it from spreading and to protect and minimize exposure to nearby persons, property, and the environment.

3.2.5.5 Military Police

1) Request ambulance, fire department, and Installation On-Scene Coordinator (IOSC) support as appropriate. IOSC activation contacts are at Table 3-2.

2) Provide site security to prohibit entry of unauthorized persons to a spill site and to provide for safe flow of vehicular traffic in and around the spill site.

3) Evacuate military personnel within the Army installation and coordinate evacuation of civilian personnel with the Civil Defense and local police if necessary.

3.2.5.6 Commanders Engineering Battalions

Military Engineering units will provide available equipment and operators for response actions, when requested by the DPW Operations Officer. Available equipment includes small equipment excavators, backhoes, bulldozers, road graders, and scoop loaders.

3.2.5.7 Other Units and Activities on USAG-HI Installations

Units and activities are represented on the IRT by the action officers as indicated in Table 3-2. Action officers become members of the IRT on an ad-hoc basis, when a spill involving the IRT occurs at one of their facilities. In a spill situation, the ECO and the activity-specific emergency response coordinator and/or alternate will provide detailed information to the IRT on the nature of the spill and the steps already taken to control the spill. The ECO and coordinator will also assist the IRT, as appropriate. The ECO will also advise on the proper procedures for disposal of the spill residues.

3.2.5.8 Support Staff to the IRT

3.2.5.8.1 Staff Judge Advocate

1) The SJA will respond to oil and hazardous substance pollution spills at the request of the IC/IOSC and serve as an advisor to the IC/IOSC.

2) Provide guidance to ensure that information, records, and samples adequate for legal purposes are obtained and safeguarded for future use by appropriate responding agencies. The SJA will also advise the IC/IOSC on all the legal aspects of spill response.

3.2.5.8.2 Public Affairs Office

1) The PAO will provide an on-site PAO spokesperson for oil or hazardous substance spills when requested by the IC/IOSC and serve as an advisor to the IC/IOSC.

2) Upon notification of an oil or hazardous substance spill, or in response to media inquiry, the PAO will prepare and coordinate appropriate media releases. Detailed procedures, responsibilities, and methods for releasing information to the public are described in Appendix I.

3.2.5.8.3 Director, Installation Safety Office

1) The Director, Installation Safety, will respond to all major spills that present hazards to personnel and facilities and serve as an advisor to the IC/IOSC.

2) Provide technical assistance to the IC/IOSC with respect to the safety of personnel during response operations and ensure compliance with applicable OSHA regulations.

3.2.5.8.4 Director of Health Services

1) Upon request from the IOSC, the Director of Health Services (DHS) will provide medical support consistent with the emergency and serve as an advisor to the IC/IOSC. For Schofield Barracks, the Occupational Health Clinic is the primary medical point of contact for spills. For PTA, the Independent Duty Medical Technician is the medical point of contact.

2) On-site care will normally be limited to emergency medical treatment necessary to preserve life and limb. Although patient evacuation by military ambulance may be desired, use of on-site transportation assets may provide a more expedient means. If on-site transportation is used, consideration must be given to the additional potential spread of hazardous substances.

3) The on-site medical responder will also advise the IC/IOSC regarding the potential threat to personnel and civilians in the surrounding area and the need for evacuation to protect human health.

4) The on-site medical responder will also assist the Director, Installation Safety Office, with respirator fit testing, as needed, for response personnel. DHS may also provide guidance to identify chemical hazards and protective equipment.

3.3 SPILL DISCOVERY AND INITIAL NOTIFICATION PROCEDURES

These procedures are summarized in quick reference tables in Appendix D for various types of chemicals typically found at USAG-HI facilities.

3.3.1 Initial Defensive Actions

The following initial defensive actions shall be implemented as necessary **if safe to do so,** upon discovery of a spill:

1) Evacuate the area of non-essential personnel, restrict access to the area and direct personnel to notify the Fire Department and the Military Police as soon as possible. DPW Environmental or the DPW Work Order desk clerk (during non-duty hours) will be notified immediately (within 10 minutes whenever possible).

2) Summon emergency medical services if personnel are injured.

3) Remove all potential ignition sources (cigarettes, torches, etc.) and determine if electric power should be turned off in the case of a flammable spill to minimize fire hazards. Turning power off is critical if there flammable material vapors present.

4) If indoors, ventilate the area in the case of the presence of volatile materials or dense vapors spilled inside a building.

5) Stop the flow of material, **if it is safe to do so**, by plugging the leak, activating any emergency shut-off valves, reorienting the container, placing the container in a drip pan, placing the container in an over-pack container, or using any other expedient method available.

6) Contain spilled material and **prevent spill from spreading and flowing into drainage systems, swales, and soil**, by using plugs, mats, absorbents, spill booms, or any other expedient method available**. Position drip pans or similar containment device under the leak until the leak is stopped. For emergency situations, or where containment area is larger than a drip pan, absorbent pads or other absorbent media placed on or inside impervious thick plastic bags can form an effective temporary catchment device for small leaks under vehicles/equipment, keeping the oil from leaking onto soil, asphalt, or other surfaces which may be labor-intensive to clean up.** NOTE: The goal is to keep the contaminant from spreading; in the absence of normal absorbent material, be innovative (examples: a painting canvas was used to block a storm drain; a disposable diaper was used to absorb an oil leak).

7) As the spill area is isolated, the "hot zone" should be expanded in a DOWNWIND DIRECTION, paying particular attention to sensitive populations (e.g. schools, child-care center, medical facilities, etc.) if spilled materials are volatile, or there is a short-term danger if material is inhaled.

3.3.2 Initial Notification Procedures

The person discovering the spill shall report it immediately to the organization's designated spill response coordinator, who will immediately (within 10 minutes) notify DPW Environmental. The Fire Department and the Military Police shall be contacted for any spill release if: 1) if there is a threat of fire; 2) danger to public health; and/or 3) it could affect a sensitive environmental area (such as entering a water body).

All spills shall be immediately reported to DPW Environmental (Table 3-2) by the organization spill response coordinator, Military Police, Fire Department or anyone with knowledge of a spill.

3.3.2.1 Notification for Major Spills

1) The Military Police are to be notified of spills immediately by the person discovering the spill. Any instructions provided by the Military Police regarding evacuation procedures shall be followed. The Military Police will notify the Environmental Division if not already done (Table 3-2).

2) The Fire Department will be notified either by the person discovering the spill or by the Military Police when the threat of fire is present. The Fire Department will notify DPW Environmental if not already done (Table 3-2).

3) Medical/ambulance support will be requested either by the person discovering the spill or by the Fire Department or Military Police, if needed.

3.3.2.2 Information to Be Provided

At a minimum the following information shall be provided prior to activation of the IRT whenever possible (Use the Spill Notification Form in Appendix B of this plan if available):

- Name and organization of individual reporting spill
- Location of spill
- Number of injured personnel and the nature of their injuries (if applicable)
- Substance spilled (if known)
- Date and time spill occurred (if known)
- Amount of material spilled (if known)
- Source of spill (if known)
- Surface on which spill occurred (soil, pavement, concrete, storm drain etc.)
- Description of all affected media

- Rate of material spill (estimated)
- Direction and extent to which the spill has traveled
- Cause of spill
- Actions taken to stop, remove, and/or control spill
- Any damages of injuries caused by the spill
- Names of person(s) and/or organizations who have also been contacted

3.4 SPILL RESPONSE ACTIONS

The Fire Department will immediately respond as necessary to protect life and property with due respect for the environment. Oil or hazardous substances shall not be flushed into drains except as an emergency measure to prevent imminent danger to life or property. When time permits, the decision to flush a spill shall be coordinated with the DPW Environmental IOSC.

For major spills or where deemed necessary, the DPW IOSC or designee will immediately proceed to the spill site and evaluate the severity of the spill and determine the response necessary for containment and recovery. All effort will be made to expeditiously control the spill. As needed, the IOSC will:

- Activate the IRT and/or involve a private contractor.
- Mobilize the DPW response team.
- Direct the DPW/Tenant Activity Response Units in accordance with this plan.
- Report reportable spills to the National Response Center, U.S. Coast Guard, SERC, LEPC, PARO, and DPW Operations Officer as described in Section 3.4.3. Contractors and tenant organizations that do not provide direct support to the Army and USAG-HI mission shall be responsible for accomplishing all spill reporting. DPW Environmental will be notified of the spill and who the contractor or tenant notified.

3.4.1 IOSC/IRT Response

The response actions of the IOSC and IRT will include the following:

3.4.1.1 Activation of the IRT

The IOSC will activate and authorize action of appropriate members of the IRT based on information relayed during initial notification. If insufficient information is available to activate the IRT, the IOSC will immediately investigate and evaluate the reported spill.

3.4.1.2 Identification of the Spilled Material

The IOSC will determine the source, type, and appropriate quantity of spilled substance if not already determined. For releases of unknown substances, the Fire Department will conduct initial field tests to identify the substance. Samples will be collected for laboratory analysis as necessary. For hazardous chemical spills it is imperative that it be determined if the chemical or mixture falls under the reportable quantity category (refer to Appendix C).

3.4.1.3 Evaluation of the Severity of the Spill

The IOSC will evaluate the magnitude and severity of the threat to public health, welfare, and natural resources. Response organization expertise such as that possessed by the Fire Department, along with technical references, such as the "NIOSH Pocket Guide to Chemical Hazards," the "Chemical Hazard Response Information System (CHRIS) Manual," and the "DOT Hazardous Materials Emergency Response Guidelines" will be used as required. In addition, computer programs can be used as resources. Available programs include the EPA's "CAMEO" and "ALOHA" programs and the Federal Emergency Management Agency's "ARCHIE" program.

The CAMEO (Computer-Aided Management of Emergency Operations) program is an integrated set of software modules jointly developed by the National Oceanic and Atmospheric Administration (NOAA) and EPA. It's designed to help first responders and emergency planners plan for and quickly respond to chemical accidents. Rapid actions by firefighters, police, and other emergency personnel are often hampered by a lack of accurate information about the substances spilled and the safe actions to be taken to protect responders and the public. CAMEO is intended to be a solution to this problem. A free copy of CAMEO can be downloaded from the following USEPA website: http://www.epa.gov/ceppo/cameo/cam_down.htm

The ALOHA air dispersion model predicts the downwind dispersion of a chemical cloud. Graphical outputs include estimates of the cloud footprint (representing the area where hazardous gas concentrations may reach a level of concern), the rate and duration of release of the chemical to the atmosphere, and chemical concentration over time at locations of particular concern. A free copy of ALOHA can be downloaded from the following USEPA website: http://www.epa.gov/ceppo/cameo/aloha.htm

3.4.1.4 Protection of Personnel

The IRT, in consultation with the DHS and the Director, Installation Safety Office, and DPW IOSC will ensure that appropriate safety precautions are implemented to protect response personnel and any additional personnel located in close proximity to the probable spill vulnerability zone. Safety precautions will be site-specific, but will include generic actions as restricting Access to the area, use of personal protective equipment, and evacuation.

WARNING

It is the responsibility of the IOSC to ensure only trained and qualified personnel perform spill response activities involving major releases of oil and hazardous substances. Aggressive response, such as to a fire in conjunction with an oil tank, shall only be performed by trained first responders such as the fire department. The IOSC must keep a current record of IRT member training and qualifications, and only use the members of the IRT within the limits of their technical capability. The IOSC shall clearly determine the specific hazards before employing non-first responder trained personnel in responding to a spill.

3.4.1.5 Determination of the Responsible Party (RP)

If the responsible party (RP) for the spill is other than the U.S. Army (e.g., tenant, contractor, etc.), the RP shall be informed of the spill, and is responsible for cleaning up the spill and accomplishing all regulatory spill notifications. The RP's subsequent response actions will be evaluated by the IOSC. In cases involving Army contractors, the IOSC shall immediately notify the appropriate contracting office of the spill. If the contractor's response action is inadequate or not completed in a timely fashion in the judgment of the IOSC, the IOSC shall inform the Contracting Officer. The Contracting Officer shall direct the contractor to provide adequate response action or face the termination of the contract. In all cases, if the RP's response action is inadequate or not completed in a timely fashion in the judgment of the IOSC, the IOSC shall assume control of the spill response, and the RP shall make reimbursement as directed by the IOSC.

3.4.1.6 Determination of the Nature and Cause of the Spill

The IOSC will document the cause of the spill and take samples as required to determine the chemical identity, concentration, and extent of the spill for response actions and documentation for possible future legal action.

3.4.1.7 Implementation of Spill Containment Procedures

Spill containment procedures, as directed by the IOSC, are to be implemented in order to confine the spill as close to the source as practicable and, if at all possible, prevent spills from exiting the property limits of the installation, or from entering storm drains, sewer line, or navigable waters. Whenever safe to do so, these procedures include, but are not limited to:

- Plugging or patching leaking drums or containers
- Repositioning the container to stop or reduce the leak
- Placing the leaking container in an appropriate overpack
- Using of mats, absorbents, spill booms, or containment vessels to control the spill
- Preventing/diverting the flow path of the spill from entering storm drains or sewer lines

- Building earth dikes, or using sandbags in the case of large spills

If the spill cannot be contained, the IOSC will determine if highly vulnerable areas, water supplies, wastewater treatment plants, or recreational waters might be adversely affected. Appropriate personnel or organizations will be notified by the IOSC if such conditions exist (e.g. the U.S. Coast Guard if navigable waters are threatened, the wastewater treatment plant if spills could enter the sewer system, etc.).

3.4.1.8 Initiation of Clean up Actions

Once the spill has been contained, clean up actions will be initiated using Army resources, if possible. Troop support from Engineering Battalions, if needed, shall be coordinated through the DPW Operations Officer. In those cases where the IRT alone cannot meet the required needs for clean up and disposal, the IOSC will request additional resources. NAVFAC (PWC) Cleanup Services is another military organization that can be contacted for cleanup assistance. Their phone number is provided in Table 3-3. The services of commercial clean up contractors will be used when their expertise and services are warranted under emergency service contracts obtained and maintained by DPW Environmental. All pollutants will be collected and disposed of in accordance with hazardous waste regulations. Cleanup will be in accordance with State of Hawaii Department of Health (DOH) guidelines. Cleanup will be conducted using the level of manpower, equipment and materials required to remove harmful pollutants in an expeditious manner. Hawaii DOH Office of Hazard Evaluation and Emergency Response is responsible for overseeing the cleanup of contaminated sites. Their website is: http://www.hawaii.gov/health/environmental/hazard/index.html.

3.4.1.9 Additional Internal Notification

Cultural Resource Manager. Whenever excavation is required to clean up a spill, the DPW Cultural Resources Manager will be consulted prior to excavation to ensure proper management of areas which may contain historical artifacts.

Wastewater Treatment Plant. Because of the potential damage that can be caused to a sewage treatment plant, in the event of a release to a sanitary sewer system, the IOSC shall notify the appropriate sewage treatment plant as soon as possible after a spill has occurred. The wastewater treatment plant phone numbers are provided in Table 3-4.

Community Commander. The IOSC will also notify the appropriate Community Commander, if deemed necessary (e.g. road or facility closure requirements), as soon as practical, of the spill and the steps taken to control the spill.

Public Affairs Office (PAO). The IOSC will advise the PAO if deemed necessary, as soon as practical, of the nature of the spill and any response actions taken. Notification procedures are described in Appendix I.

Organizational Action Officers. Organizational Action Officers shall be notified, as soon as practical, of spills relating to waste oil, fuel or hazardous wastes at their respective sites.

3.4.2 Incident Log

The IOSC or designee will maintain an Incident Log detailing all actions taken during the course of the spill response. The log will satisfy the written notice requirements of SARA Title III. The log will include, but is not limited to:

- Identification of the substance(s) and approximate quantity (volume) of substances released. The name (trade and chemical) and chemical abstract service registry number if available
- Location of the spill, cause of spill, time of day, and duration of the release.
- Where the release occurred, sensitive environmental areas affected, and the extent of any environmental damage, if any
- Actions taken to recover the substance(s) and restore the environment
- Personnel involved in the response
- Health and safety precautions and measures employed
- Injuries or exposures that occurred and medical attention received by injured/exposed persons
- Known or anticipated acute or chronic health risks
- Internal notifications performed
- A brief description of the spill/release including the medium or media into which the release occurred
- Regulatory status of the release and agencies notified. Notification threshold (state and Federal) should be determined (see Section 3.4.3).
- Name, official office address and phone number of person notifying any state or Federal agency
- Under the Hawaii Contingency Plan the DOH requires a list of all external agencies that were notified
- Samples collected and analyzed
- Property damage, if any
- Disposal of spill residuals

- Decontamination procedures used

The PAO should be involved in the notification process if there is a potential public health threat. This information can only be released by the PAO or his representative.

3.4.3 Reporting

3.4.3.1 Hazardous Substances/Hazardous Waste Releases

Once it has been determined that a reportable hazardous substance release has occurred in accordance with 40 CFR 302: EPA Designation, Reportable Quantities and Notification Requirements for Hazardous Substances Under CERCLA it is the responsibility of the IOSC to ensure the spill is reported to Federal Agencies (refer to Section 3.2.4.1). Chemicals, used on USAG-HI installations, with reportable quantities (RQs) are identified in Appendix C. For mixtures, if the quantity of one or more of the hazardous constituent(s) of the mixture or solution is unknown, notification is required where the total amount of the mixture or solution released equals or exceeds the RQ for the hazardous constituent with the lowest RQ. Spills of hazardous substances as defined in this regulation must be reported immediately to the National Response Center or the U.S., Coast Guard. Telephone numbers are provided in Table 3-5. USEPA may require a written follow-up report for a hazardous substance spill.

If an extremely hazardous substance, as defined in the SARA Title III requirements (40 CFR Part 355), has been released, the IOSC must ensure it is reported to state and local agencies. Releases of extremely hazardous substances in excess of reportable quantities require immediate notification to the State of Hawaii Emergency Response Commission (SERC) and the Local Emergency Planning Committee (LEPC) as required in SARA Title III, 40 CFR Part 355: Emergency Planning and Notification. Initial notification must be by telephone or in person. Telephone numbers are provided in Table 3-5. A written follow-up report is also required, containing the information detailed in the previous Section (Incident Log).

The regulatory reportable quantities (RQs) of hazardous and extremely hazardous substances used and stored at USAG-HI facilities is available upon request from the EPCRA Program Manager at DPW Environmental. Complete lists of RQs of hazardous substances, as defined in CERCLA, 40 CFR Part 302, and SARA Title III, 40 CFR Part 355, are provided in Appendix C.

Releases of unlisted hazardous wastes in excess of the RQ also requires reporting under CERCLA regulations and in some cases reporting of releases of hazardous wastes to EPA under the RCRA regulation in 40 CFR 265 Subpart C.

Spills of reportable quantities under the State Contingency Plan (Hawaii Administrative Rules, Title 11, Department of Health, Chapter 451) will be reported to the SERC and to the LEPC. Refer to Section 3.4.2, Incident Log, for guidelines on reporting the incident to state and local agencies. Verbal and written follow-up notifications shall be made within timeframes specified in the State Contingency Plan. In general, verbal notifications shall be made to the SERC and LEPC as soon as possible; written notifications shall be postmarked within 30 days. Verbal notification for oil spills/releases of less than 25 gallons on land is not required.

Releases which, based on the nature, gravity, potential for adverse publicity, or potential serious consequences, will also be immediately reported to IMPC-PARO in accordance with AR 190-40, Serious Incident Report, and also to the DPW Operations Officer. A copy of all written follow-up notifications to the SERC and LEPC will also be provided to IMPC-PARO and the Staff Judge Advocate (SJA).

For reportable spills/releases caused by contractors/tenants, the contractors/tenants are responsible for making all regulatory verbal and written notifications.

3.4.3.2 Releases of Oil to Navigable Waters

Releases of oil into navigable waters must immediately be reported to the National Response Center or the U.S. Coast Guard in accordance with 40 CFR 110: EPA Regulations on Discharge of Oil. Reportable releases are defined as those in excess of water quality standards or cause a visible sheen on the water surface, a discoloration of adjoining shorelines, or form a sludge or emulsion beneath the water surface or on adjoining shorelines. A follow-up written report to EPA, within 60 days, is required for oil spills of 1,000 gallons or more, or if two oil spills, each exceeding 42 gallons, occur within a 12-month period. Refer to Final Rule amending requirements of the Oil Pollution Prevention regulation at 40 CFR 112 dated 26 December 2006.

Table 3-4. List of Persons/Agencies to be Notified of Spills

Name/Agency	Telephone Number
SEWAGE TREATMENT PLANTS:	
Schofield Barracks/Wheeler Army Airfield (SB, Wheeler, Kunia, and Helemano Wastewater)	656-1330/864-0842 621-3098
Sand Island Wastewater Treatment Plant (Ft. Shafter, Ft. DeRussy,TAMC, and Aliamanu wastewater)	847-8307
IMCOM-Pacific Region Office (IMCOM-PARO), Environmental Office	438-3080 (phone) 438-8688 (fax)
REGULATORY AGENCIES	
National Emergency Response Center:	800-424-8802 (24 hours)
Environmental Protection Agency (Region IX, San Francisco)	800-300-2193(24 hours)
U.S. Coast Guard, Marine Safety Office (Honolulu)	541-2477/842-2600
State Emergency Response Commission, Hawaii Department of Health, Hazard Evaluation and Emergency Response	(808)586-4249 (808) 247-2191(24 hours)
Local Emergency Planning Committees (notification required by SARA Title III) Hawaii Oahu	911 For Emergencies Non Emergency Numbers 936-0858 723-8960
Name/Agency	**Telephone Number**
Local Fire Departments (notification required by SARA	

Title III) Hawaii (Hilo)	961-8297 961-8336 (after hours)
Oahu (Honolulu)	723-7101/7162 911 (after hours)

3.4.3.3 Underground Tank Releases

Release reporting, investigation, and confirmation requirements for underground tanks are listed in Subpart E of the EPA Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks (40 CFR 280). The State of Hawaii has adopted its own UST regulations, HAR, Chapter 11-281. The Hawaii Department of Health responsible for administering the State UST program has published the document the "Technical Guidance Manual For Underground Storage Tank Closure and Release Response." This manual describes release response, notification, and reporting requirements for releases from USTs.

3.4.4 Restoration of Spill Sites

The ECO or IRT as applicable will assure the proper disposal of spilled oil and other petroleum wastes. If the spilled material can be classified as a hazardous waste under RCRA, it must be properly managed and disposed of in accordance with the Installation Hazardous Waste Management Plan.

For releases, spills, or leaks from underground tanks, initial abatement measures, site characterization, free product removal, investigations for soil and groundwater clean up, and corrective action must be in accordance with EPA Underground Tank Regulations, 40 CFR 280.60 through 280.66. The HDOH "Technical Guidance Manual For Underground Storage Tank Closure and Release Response" reflects federal requirements and includes Hawaii specific requirements. The State of Hawaii Office of Hazard Evaluation and Emergency Response has established general soil and groundwater Environmental Action Levels for contaminants that are commonly associated with releases from UST systems. Current EALs are Accessible at _www.hawaii.gov/health/environmental/hazard/eal2005.html.

Remedial procedures and clean up levels for other contaminants in soils or water are governed by the National Oil and Hazardous Substances Pollution Contingency Plan under CERCLA (40 CFR 300).

Table 3-5. Tier 1 Action Levels for Soil and Groundwater

Contaminant	Groundwater (mg/L)	Soil (mg/Kg)

Contaminant	Groundwater (mg/L)	Soil (mg/Kg)
Benzene	0.005	0.05
Toluene	1.0	16
Ethylbenzene	0.14	0.50
Xylenes	10	23
MTBE	0.020	0.005
Benzo(a)pyrene	0.0002	1.0
Acenaphthene	0.32	18
Fluoranthene	0.013	11
Naphthalene	0.24	41
PCE	0.005	0.29
1,1-DCE	0.046	0.47
Vinyl chloride	0.002	0.18
TCE	0.005	0.01
1,1,1-TCA	0.20	0.10
PCBs (all)	0.0005	1
Lead (total)	0.0056	400
Cadmium (total)	0.005	38
TPH-residual fuels	5,000	5,000
TPH-middle distillates	5,000	5,000
TPH-gasoline	2,000	2,000

Source: State of Hawaii "Technical Guidance Manual For Underground Storage Tank Closure and Release Response," March 2000 (Drinking Water Source Threatened), p. 5-29.

3.5 SPILL RESPONSE SUPPLIES

3.5.1 Response Kit for Minor Spills

Each activity responsible for management of oil or hazardous material will maintain a spill response kit compatible with the material stored for containing and cleaning-up minor spills and for controlling major spills until the IRT or DPW contractor can respond. The contents of the kit should be tailored to the needs of each unit/activity based on worst case scenarios considering the amount of oil, fuel or hazardous substances stored at the activity, the type of operations conducted, proximity of surface water or drains, and proximity to immediate spill response support agencies (e.g., fire department, IRT). It is recommended that a basic kit shall include the following:

- A supply of granular absorbent that will absorb both oil-based and water-based liquids, including oils, solvents, caustics, and acids. The granular absorbent can also be used for over packing leaking drums or other containers and is effective in cleaning up oil spills on asphalt surfaces.

- Absorbent pillows, pads, socks, and booms. For spills of oil, hydrophobic absorbent media which absorbs hydrocarbons (oil) but not water are recommended in situations where rainfall is imminent or occurring or when absorbent material will be left in place

overnight or for a period of time. Hydrophobic oil-absorbing media is also effective in absorbing oil sheen on surface water (e.g. secondary containment, swales, etc.).

- Loose absorbent media. There are effective loose absorbent media that may be used including recycled sorbents and biobased sorbents (e.g. made from peat moss). These materials may absorb more oil per pound therefore requiring less storage space; however, may be less effective that the granular clay type.

- Straight edge, non-sparking shovels (fabricated with non-ferrous metal, with a polypropylene coating on the blade, or fully fabricated from polypropylene).

- At least two empty DOT approved open-head over-pack/salvage drums.

- Open-head DOT approved containers of assorted sizes for packaging spill residues (such as 10 gallons and 55-gallons).

- Grounding equipment for transfer of flammable materials.

- Brooms and non-sparking dustpans.

- Polyethylene bags with ties.

- Rubber gloves, rubber aprons, rubber boots (or clothing recommended by the Safety Officer).

- Safety goggles.

- Absorbent rags or paper towels.

- Strong adhesive backed tape (e.g., duct tape) for labeling and for sealing triwalls, etc.

- Drain blocks and covers/mats and storm drain covers.

- Drip pans or other secondary containment equipment. (Note: For emergency situations, or where containment area is larger than a drip pan, absorbent pads placed over impervious plastic bags can form an effective temporary catchment device for small leaks under vehicles/equipment.)

- For facilities or operations where there is a potential for spills to migrate to soil, excavation may be required. At least two DOT-Approved supersacks (a woven polypropylene FIBC (Flexible Intermediate Bulk Container)) or triwalls (made of cardboard) with liners capable of containing at least one cubic yard of soil (four times the volume of a 55-gallon drum). Although supersacks do not deteriorate like the triwalls will when exposed to UV or rain, they are for limited outdoor storage. Supersacks have "loop lifts" which allow the sacks to be lifted using forklifts, can be folded up and easily stored in small spaces, and are significantly less costly than triwalls. Triwalls may be

easier to fill; however, must be kept dry to maintain their integrity, and are difficult to transport and store due to the size. Both the supersacks and triwalls must be mounted on sturdy pallets in good condition in order to turn in the contaminated soil in to the TAP, since when filled, the contents may weigh close to 2,000 pounds.

- All facilities with potential for oil runoff (especially at motorpools and maintenance facilities) are recommended to install hydrophobic oil-absorbing drain inserts which can be positioned inside stormwater inlets to absorb residual oil runoff.

Items in the spill kit should be stored together in a well-marked and Accessible location. Typically, spill response materials are stored in yellow over pack drums and are readily Accessible and identifiable by facility personnel. The unit ECO or alternate person at each activity/organization shall maintain the kit, replenishing supplies as needed. The location of the kit should be posted with the list of emergency contacts.

It is not necessary to purchase commercially available spill kits, which are costly and do not contain all the supplies necessary. Nor is it necessary to purchase specialized protective clothing (such as Tyvek suits), unless it is specifically recommended by the Installation Safety Officer; the protective clothing that is normally used in the workplace when handling hazardous substances should be sufficient for response to minor spills.

Personnel shall be trained in the use of the equipment and supplies contained in the kit.

3.5.2 IRT Spill Supplies

The DPW Environmental and the DPW Unit will maintain a supply of absorbent materials and spill clean up equipment to supplement the spill kits to be maintained by individual organizations. A back-up supply should include those items suggested above for the minor spill kits. DPW Environmental supplies are stored at Building 6045, Schofield Barracks East Range, and DPW Unit supplies will be maintained at the DPW maintenance and TAP facilities at Schofield Barracks East Range Building 6040, Fort Shafter Building 422, and Pohakuloa Training Area. IRT support units will provide an inventory of spill recovery material to DPW Environmental annually by October 1 of each year. The list will detail type and quantity of material on hand.

4.0 EMPLOYEE TRAINING AND BRIEFINGS

The cause of most oil or hazardous substance spills on USAG-HI facilities is accidents involving lack of proper attention to detail, closely followed by discharges resulting from equipment failures. Most equipment failures can be avoided by proper inspection and maintenance. Consequently, an important factor in an effective spill prevention program is training which emphasizes good work practices, inspection, and maintenance.

It is critical that units and activities adhere to regular scheduled maintenance and inspections as specified in site SOPs. When working with or handling oil or hazardous substances, personnel

should be aware of the potential for discharges and perform their tasks with attention to detail and avoid "cutting corners."

USAG-HI training requirements are largely dictated by individual conditions and responsibilities; however, all units and activities must participate in the Environmental Compliance Officer (ECO) Program. Within 30 days of appointment, ECOs must attend the 3-day basic ECO course administered by DPW Environmental, followed by an annual refresher. The training schedule is posted on the DPW website at https://dpwhawaii.army.mil/ECO (File Name: ECO Training Class). Subject matter includes regulatory requirements for the storage and handling of POL, hazardous material/wastes, reporting and record keeping, and spill prevention and response. ECOs are responsible for ensuring their individual facilities are operated IAW regulations and DPW guidelines. ECOs act as unit level trainers and serve as unit/activity level spill coordinators. A well-trained ECO backed by their Chain of Command brings relevant information and training to their respective units.

The ECOs and supervisors in all POL and hazardous material handling/storage areas are responsible for indoctrinating their personnel in spill prevention and response procedures and regulations. The ECOs should tailor the general elements of this plan to their own unique operation. Records of all training showing the date and content of the training shall be kept with other personnel training records.

4.1 INITIAL TRAINING

USAG-HI official policy requires that all personnel who handle or transport hazardous materials be trained IAW with federal, DoD, Army, and USAG-HI regulations and guidelines.

- For all units/activities, identify the Primary and Alternate ECO responsible for the individual Unit/Activity. ECOs must attend the DPW ECO course within 30 days of appointment. Under no circumstances will any unit deploy without a qualified ECO.

- All personnel handling hazardous materials must receive Hazard Communication training required by 29 CFR, Part 1910.1200 (may be conducted by ECO), and general awareness training in recognizing and identifying hazardous materials within 90 days of being assigned.

- All personnel handling hazardous materials or oil must be adequately trained in the performance of their job.

- Personnel working in areas with oil or hazardous materials must be trained on the location of spill response kits, and actions to take in the event of a spill or release.

- Document all training and maintain records for at least three years.

- Drivers transporting hazardous materials must receive training IAW 49 CFR, Part 172.704 and 177.816 (general awareness training and Safe Transportation of Hazardous Materials Course), and DoD 4500.9-R, Chapter 204.

- Drivers transporting bulk fuel (500-gallons or more) must complete the 40-hour Bulk Fuel Handlers Course taught by their command.

- In some cases units deployed in the field may have to designate qualified personnel as Unit Response Team members who will respond to releases in the field until relieved by a HazMat Response Team (DoD, municipality or contractor). They require Initial Response training, OSHA Hazardous Waste Operations and Emergency Response training includes 40 hours of initial training and annual 8 hour refresher training for personnel involved in emergency response.

The training for the Installation Response Team members will be more extensive than the general personnel training guidelines presented in this section. Specific recommendations for IRT training are presented in Section 4.3.

4.2 FOLLOW-UP TRAINING

All units/activities and contractor and tenant organizations handling oil and hazardous substances in their daily operations will provide basic spill prevention and response training to their personnel, at a minimum on an annual basis.

All employees whose job involves the storage or handling of petroleum products or hazardous substances should receive refresher training from their supervisor or a designated representative (usually the ECO) at least quarterly as required by the IHWMP. This training may be accomplished individually or in groups, in briefings, or complete reviews. This refresher training should include:

• A review of the pertinent sections of this plan including procedures and requirements in Section 2 and 3 of this plan and the appropriate site-specific appendices related to the employee's job responsibilities.

• A discussion of spills since the last refresher training that can serve as examples of the need for proper procedures.

• A review of spill reporting and emergency response procedures

• An opportunity for employee feedback on conditions in their specific work area, including discussions of the results of any inspections relative to spill prevention.

• A reaffirmation by the employee of his or her understanding of the SPCC program and the possible ramifications of non-compliance with spill prevention procedures.

4.3 INSTALLATION RESPONSE TEAM (IRT) TRAINING

In-depth training at the appropriate level in emergency response and hazardous waste operations training under OSHA 1910.120 shall be provided to IRT members if they will be directly responding to spills of a hazardous nature. OSHA Hazardous Waste Operations and Emergency Response training includes 40 hours of initial training and annual 8 hour refresher training for personnel involved in emergency response. Responders that are taking aggressive action, for example shutting valves on fuel tanks during a fire, require specific training, and are required be trained to "first responder level." The training must be provided by qualified providers and must encompass emergency planning, emergency procedures, and personal protective equipment. Records must be kept of all training. If a contractor will be providing direct emergency response services, IRT personnel need not receive the degree of training required under OSHA unless they are required to be directly on-site. Since for Army and USAG-HI caused spills, cleanup of large spills and spills where advanced personal protective equipment (PPE) is required will generally be contracted out, IRT members other than IOSCs will only require initial responder training which is provided at the ECO class and at unit/activity quarterly training.

Additional training shall include (as required by job description):

- Training program development, for training installation personnel
- Oil and hazardous substance incident response and contingency planning
- Response procedures
- Health and safety regulations and practices for hazardous substance spill response
- Spill prevention planning, control, and countermeasures
- Environmental protection
- Hazardous waste generation for treatment, storage and disposal facilities
- Hazardous waste packaging and transportation
- Federal, State and local regulations

At a minimum, IOSCs should receive the following training:

- Incident Command Training as described in OSHA 1910.120
- Hazardous Waste Operations and Emergency Response (HAZWOPER) 40 hour course.

4.4 UNIT RESPONSE TEAM (URT) TRAINING

Units that are deployed under field conditions and have no direct or immediate support available from a Facility IRT for a spill incident may need to assign qualified personnel to a URT. Every unit must have a qualified person who has been designated as an ECO in writing. The ECO will serve as the On Scene Commander until an Installation/Municipal Fire Department or Response Team has arrived on the scene. Assigned URT members must have as a minimum the following training:

- OSHA Hazardous Waste Operations and Emergency Response training includes 40 hours of initial training and annual 8 hour refresher training

- Health and safety regulations and practices for hazardous substance spill response.

- Hazard Communication training required by 29 CFR, Part 1910.1200.

- Trained on the location of spill response kits, and actions to take in the event of a spill or release.

5.0 RECOMMENDATIONS

5.1 INTRODUCTION

Summaries of recommendations for USAG-HI facilities that have the potential for oil product spills are provided in the Access database - Appendix A. The facilities addressed include:

Aliamanu Military Reservation (AMR)
East Range (ER)
Fort DeRussy (FDR)
Fort Shafter (FS)
Helemano Military Reservation (HMR)
Kilauea Military Camp (KMC)
Pohakuloa Training Area (PTA)
Schofield Barracks (SB)
Tripler Army Medical Center (TAMC)
Wheeler Army Air Field (WAAF)

5.2 RECOMMENDED CORRECTIVE ACTIONS

5.2.1 Aboveground Storage Tanks (ASTs)

An inspection of existing ASTs was conducted while preparing this plan, and recommendations are provided in the Access Database referenced in Appendix A of this plan. ASTs are inspected annually; refer to the AST Program Manager for the most recent information. Currently only visual inspections are conducted. It is recommended that tanks be periodically inspected by a certified tank inspector and that integrity testing be conducted according to an established

schedule. The frequency and scope of testing should be conducted in accordance with a standard such as the Steel Tank Institute (STI) Standard SP-001.

5.2.2 Field Fueling Operations

A standard procedure for field fueling operations should be developed and implemented. Procedures should include storing fuel vehicles in proper containment, placing drip pans under hose connections, fuel dispensers, and other potential spill points, and having absorbent materials readily available. A standard checklist can be used to ensure that units are in compliance with the established standard procedures. At Pohakuloa Training Area and other temporary field fueling sites, initial inspection and an environmental clearance of the fueling sites should be conducted.

5.2.3 GIS Map Layer Revisions

Some of the USAG-HI GIS system map layers have discrepancies that should be corrected in order to maintain accurate records both for current use and for future project planning. It is recommended that these map layers be updated.

5.2.4 Dining Facilities

Several of the dining facilities had discrepancies related to inadequacy of secondary containment volume, security, and spills. In cases where facilities consistently produce minimal quantities of waste cooking oil (less than 55 gallons per month), the 55 gallon drums should be replaced with smaller capacity drums to alleviate the secondary containment and other requirements. In addition, dining facilities should be periodically inspected by DPW-ED to ensure that the storage areas are in compliance with all aspects of the SPCC regulations.

6.0 PLAN REVIEW AND AMENDMENT PROCEDURES

6.1 INTRODUCTION

Plan Certification

In accordance with 40 CFR 112 and AR 200-, this SPCCP must be reviewed and certified by a Registered Professional Engineer (PE). The PE, after examination of the facility by him/her or his representative, and having good knowledge of the provisions of 40 CFR 112, will certify the plan has been prepared in accordance with good engineering practices.

6.1.1 Plan Review and Amendments

A review and evaluation of the SPCC Plan must be accomplished within five years from the date that the last review was done. Any amendment must be implemented as soon as possible, but not later than six months following preparation of any amendment. Completion of the review and

evaluation must be documented and a statement signed as to whether the Plan will be amended, either at the beginning or end of the Plan or in a log or an appendix to the Plan. The following words will suffice, "I have completed review and evaluation of the SPCC Plan for (name of facility) on (date), and will (will not) amend the Plan as a result."

A Registered Professional Engineer (PE) must certify any technical amendments to the Plan in accordance with 40 CFR 112.3(d).

The Regional Administrator may require an installation to amend the SPCCP if he finds that it does not meet the requirements of 40 CFR 112.4 or that amendment is necessary to prevent and contain discharges from an installation facility.

USAG-HI is also required to amend the SPCCP for any of the following reasons:

- As required by the USEPA after review of the plan, submitted because of an oil or hazardous substance spill event
- When there is a change in facility design, construction, operations, or maintenance, which materially affects the potential for a discharge
- If the required five-year review of the plan indicates more effective control and prevention technology will significantly reduce the likelihood of an oil or hazardous substance spill event (if such technology has been field proven)
- If the DPW finds that there is a condition requiring immediate action to prevent the discharge or risk of discharge of oil or hazardous substance
- Whenever an amendment to federal, state or local legislation, affecting this plan, or changes in Department of Defense or U.S. Army policy occurs. Particular attention should be given to changes in reportable spill quantities for oil and liquid hazardous substances.

All technical plan amendments, except those proposed by the EPA Regional Administrator or as directed under 33 CFR 154, must be certified by a Registered Professional Engineer. The DPW will keep a copy of all amendments to this plan and will note such amendments on the Record of Review and Amendments page at the front of this plan.

6.2 USEPA REQUIRED SPCC PLAN REVIEW AND AMENDMENTS

USAG-HI must submit the SPCC Plan and any amendments to the EPA whenever:

- A discharge of more than 1,000 gallons (approximately 20 drums) of oil into navigable waters in a single spill event occurs

- A discharge of oil in harmful quantities occurs into navigable waters in two reportable spill events within any 12-month period. A discharge of harmful quantities, as defined in 40 CFR, Part 110, includes discharges which:

  - Violate applicable water quality standards

  - Cause a film or sheen upon the surface of the water, cause a sludge or emulsion to be deposited beneath the surface of the water, or cause a discoloration of adjoining shorelines

Within 60 days of the occurrence of either of these two conditions, the USAG-HI must submit to the EPA Regional Administrator (Region IX, 215 Fremont Street, San Francisco, CA 94015) the following:

- Name of the facility
- Name of the owner or operator of the facility
- Location of the facility
- Description of the facility
- Date of initial facility operation
- Maximum storage or handling capacity of the facility and current normal daily throughput
- A complete copy of the Spill Prevention and Response Plan with any amendments
- The cause of such spill, including a failure analysis of the system or subsystem in which the failure occurred. The failure analysis is to examine and explain the reason for the failure resulting in the spill event. The analysis should be explicit, definitive, and not general. For instance, it would be inadequate to simply report that the cause of the spill was the failure of a storage tank. The failure analysis should indicate in some detail the nature of the failure that caused the spill, such as a vehicle collision, etc
- The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence
- Such other information as the USEPA Regional Administrator may require

The USEPA will review the information and may require USAG-HI to amend the plan. When USEPA proposes to require an amendment to the plan, USAG-HI will be notified by certified

mail or by personal delivery. The USEPA will specify the terms of such an amendment. Within 30 days from receipt of this notice, USAG-HI may submit written information, views, and arguments on the proposed amendment requirement. After considering all material presented, the USEPA will notify USAG-HI of the amendment required or will rescind the notice. USAG-HI must amend the plan as required within 30 days after such notice, unless the Regional Administrator, for good cause specifies another effective date. The amended plan must be implemented as soon as possible but not later than six months after the amendment becomes a part of the plan, unless the Regional Administrator specifies another date.

6.3 FACILITY MODIFICATION REVIEW AND AMENDMENTS

Whenever there is a modification in facility design, construction, operations, or maintenance activities, which materially affects the potential for a discharge as described in 40 CFR 112.1(b), USAG-HI is required to amend this plan to reflect such a change. Examples of changes that may require amendment of this plan include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement or installation of piping systems; construction or demolition that might alter secondary containment structures, changes of product or service; or revision of standard operation or maintenance procedures at a facility.

The DPW is responsible for reviewing all plans for new construction, maintenance or remodeling to determine if amendment of the plan is required. If the plan must be amended, the amendment must be prepared within six months and implemented as soon as possible, but not later than six months following the preparation of the amendment.

6.4 DEPARTMENT OF THE ARMY REQUIRED REVIEW AND AMENDMENTS

USAG-HI is required by AR 200-1 and Federal regulation to complete a review and evaluation of the SPCCP at least every 5 years and update it as necessary. This review must include an assessment of new technology that has become available for the prevention of spills since the plan was last reviewed. Additionally, a complete facility inspection must be performed to verify conformance with the requirements of the plan and that past recommendations have been implemented. As a result of this review and evaluation, the plan must be amended within six months to include more effective prevention and control technology if the technology will significantly reduce the likelihood of a spill event and if it has been field proven at the time of the review. A PE must recertify the plan when changes occur in installation design, construction, operation, or mission.

6.5 INSTALLATION SPILL CONTINGENCY PLAN REVIEW AND AMENDMENTS

The Installation Spill Contingency Plan (ISCP) will be integrated into the SPCCP which will provide coordination of response activities within the facility, minimize duplication, and simplify plan development and maintenance. It will be reviewed and amended when the SPCCP is reviewed, as required by AR 200-1 and Federal regulation. The DPW will be responsible for conducting the ISCP review.

All organizations affected by the ISCP are encouraged to review the plan more frequently as required. Any proposed amendments or changes to the plan should be directed to the DPW SPCCP Coordinator for review. Accepted changes to the plan will be sent to individuals and organizations on the original distribution list. Changes should be logged on the Record of Review and Amendments page at the front of this plan. Examples of some circumstances, which may warrant more frequent plan review and update, are as follows:

- When a water pollution discharge permit (for the discharge of a hazardous substance) or a hazardous waste management permit is issued, reissued, or amended
- When facility changes occur which increase the potential for spills or change the spill prevention and response procedure methods and equipment
- When the ISCP fails or proves to be ineffective in the prevention of or response to a spill
- At the request of the U.S. EPA Regional Administrator, U.S. EPA Enforcement Division Director, or applicable state agency director
- When changes occur in the DPW, Installation On-Scene Coordinator, Installation Response Team, or spill response equipment list
- After enactment of, or amendment to, pertinent Federal or State legislation, or changes in Department of Defense or U.S. Army policy. Particular attention should be given to changes in reportable spill quantities for oil and liquid hazardous substances
- After pertinent modifications of Federal, Regional, and State spill contingency plans
- After any changes in adjacent land and water use that would affect spill prevention and response considerations

6.6 PLAN CERTIFICATION

All changes to the plan of a technical nature will be reviewed by a registered professional engineer and certified to have been prepared in accordance with good engineering practices, after on-site examination of the facility and IAW with Title 40 CFR Part 112.