

# Spill Response Training

## SCS ENGINEERS

By Cheryl Moran, Project Manager

If you use hazardous substances or store oils or fuels on site at your facility, you need to be prepared to respond properly to a release. Having a written plan such as a Resource Conservation and Recovery Act (RCRA) Contingency Plan, facility emergency response plan, or Spill Prevention Control and Countermeasure (SPCC) Plan is your company's first step to protecting human health, the environment, and your company's assets from the aftermath of a spill. Not all of your employees are qualified to clean up all releases. Training may be required if there are potential risks. Choosing the correct level of training and the right people to train is essential to maximizing your facility's spill preparedness.

Spill planning and reporting can be subject to rules from multiple agencies, depending on what spilled, where the spill happened, and whether it leaves your property. For instance, a release on a roadway will include Department of Transportation requirements. If the material released is either a hazardous material or an extremely hazardous substance that leaves your property, or an oil that enters a storm sewer or causes a sheen on a waterway, the Environmental Protection Agency mandates the reporting. Concurrently, the Occupational Health and Safety Organization (OSHA) is the regulatory body that oversees how you go about your spill response activities.

### Where do I Start?

You can start by assessing your facility's spill potential. Take an inventory of the chemical products at your facility. You will want to include some details in your assessment such as the related hazards of each product, the amount you store on site, the biggest container, and where these are stored and used in relation to employee work stations and other operations at the facility. This assessment may already be incorporated into your written plans.

Ask yourself these questions:

1. Are emergency responders able to get to our site quickly? These entities could include the local fire department, community hazardous materials team, or a private spill cleanup contractor.
2. Does our facility have a written plan that includes facility personnel responding to spills?
3. Do we want employees to be able to take defensive actions to help stop a release from spreading?

4. Do we want employees to be able to take offensive action to stop the release at the source?

Based on your answers, choose the level of spill response training that best suits your needs.

### No Training

Are all spills emergencies? No. Some releases are minor. For instance, if you spill a quart of oil on the floor, there is little risk to you to clean it up. It should be easy to do without having to call for assistance. No special training is necessary in order to clean a small spill of a material that is not hazardous. If your spill potential assessment shows that you have a low risk of a release that could threaten human health or the environment, and amounts that could release from a single container are minimal, you do not need any special training.

### First Responder Awareness Level

First responder awareness level trains employees who are likely to discover a release. Awareness level responders will know how to identify hazardous materials and their risks, understand the potential outcomes associated with an emergency created when hazardous substances are present, have the ability to recognize the presence of hazardous substances in an emergency, and know how to use the U.S. Department of Transportation's Emergency Response Guidebook (ERG). Responders are expected to understand the employer's emergency response plan including site security and control. Most importantly, awareness level responders must recognize the need for additional resources and know how to make appropriate notifications.

### First Responder Operations Level

If you have a moderate spill potential and either risk or delays in getting outside assistance to your site, first responder operations level is what you need. These personnel are proficient in all of the training provided to the first responder awareness level, have knowledge of basic hazard and risk assessment techniques, have an understanding of basic hazardous materials terms, know how to select and use proper personal protective equipment, and know how to implement basic decontamination procedures. First responders at the operations level can take defensive actions only to prevent the spread of a release. These initial actions can be valuable if your fire department or hazardous materials response team will not be able to arrive quickly. Candidates for first responder operations level receive 8 hours of initial training and demonstrate competency in each of the required actions. An annual refresher is required.

### Hazardous Materials Technician Level

Facilities with higher levels of risk may want to consider Hazardous Materials Technician Level training for select employees. Hazardous materials technicians are individuals who respond to releases or potential releases to stop the release. They assume a more aggressive role than first responders at the operations level because they are able to approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance. Hazardous materials technicians receive training that operations level responders receive, plus have competency in the following areas:

- Know how to implement the employer's emergency response plan
- Know the classification, identification, and verification of known and unknown materials by using field survey instruments and equipment
- Be able to function within an assigned role in the Incident Command System
- Know how to select and use proper specialized chemical personal protective equipment provided to the hazardous materials technician
- Understand hazard and risk assessment techniques
- Be able to perform advance control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available with the unit
- Understand and implement decontamination procedures
- Understand termination procedures
- Understand basic chemical and toxicological terminology and behavior

Hazardous materials technician level responders receive at least 24 hours of initial training and 8-hour annual refreshers, and their employers must confirm that they are able to perform the required response functions.

### Training Resources

Spill response training should be conducted by trainers who have satisfactorily completed a training course for teaching this subject, or have the training and/or academic credentials and instructional experience necessary to demonstrate competent instructional skills and a good command of the subject matter of the courses they are to teach.

You can find OSHA's spill response expectations in the Chapter 29 Code of Federal Regulations Part 1910, Subpart H, with Appendix E providing training curriculum guidelines.

### Synchronize Your Plans and Your Teams

After spill response training has been completed, be sure to update your written plans to reflect the level

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of response authorized at the facility, a list of trained personnel, and the method the facility will use to notify the spill response team that a release has occurred. Support your team by conducting routine spill drills, so your staff is prepared to take efficient and effective actions in the event your facility has a spill.

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