



Indiana Department of Environmental Management
Protecting Hoosiers and Our Environment Since 1986

Office of Land Quality



A State that Works

Spill Response

Preplanning, Reporting, & Notifications



Pollution prevention/spill response should begin long before the first drop hits the ground. Preplanning can prevent releases, lessen the amounts released and shorten the time required to return the site to prerelease conditions.

Secondary benefits of preplanning include injury prevention, cost savings and avoiding violations or fines brought by governmental agencies. It is easy to see how a small investment of time and resources can reap large rewards.



Preplanning Considerations

- What could be released?
- Causes – why/where could a spill occur?
- Identifying spill routes
- Interventions
- Preparation





What could be released?

- Inventories
- Tier II's

What should be counted?

- Hazardous Substances
- Extremely Hazardous Substances
- Hazardous Waste
- Petroleum products
- Objectionable substances
 - Not hazardous but could cause environmental damage (e.g milk)



Be aware of materials on site

- Brought in by contractors or transporters
- Sitting for disposal
- In storage





Causes – Identify where could a spill occur

- Process review
- Past releases
- Work orders
- Employee comments
- Walk though
 - Fire Department
 - Business association
 - IDEM CTAP
 - Preselected environmental spill contractor



Impact Reduction

- Find less hazardous alternatives
 - Citrus based cleaner instead of high VOC solvent
- Periodic maintenance
 - E.g. Replacing hoses and seals before they fail
- Periodic inspections
 - Catch a little problem before it grows
 - Preferential pathways



Impact Reduction (*continued*)

- Hardware alterations
- Alter storage
 - Smaller containers/smaller amounts
 - Secondary containment pallets
 - Protective barriers
- Alter machinery
 - Braided hose vs rubber
- Other considerations
 - Scheduling – unload at a less busy time?



Preparation

- It is going to happen
- Physical components wear out and break
- Employees are distracted for a moment
- Plain bad luck





Preparation consists of

- plans
- resources
- training





Spill Plans

- Known as contingency plans
- Documents who will do what and when
- Tasks listed by position not by person
 - Primary and backup personnel
- Plan participants must be knowledgeable
- Facility maps/Emergency equipment locations
- List of emergency equipment
- Periodic reviews and updates



What is in a plan?

- Notifications
 - Internal
 - Alarms
 - Shelter in place
 - Evacuation
 - Manager(s)
 - Safety/Security





What is in a plan? (*continued*)

- Notifications
 - External
 - Emergency first responders - 911
 - IDEM ER ASAP, but within 2 hours (per 327 IAC 2-6.1)
 - 888 233 7745
 - National Response Center
 - 800 424 8802
 - IDEM program areas
 - Local Emergency Planning Committee (LEPC)
 - Public



- Who will make the needed notifications?
- What, Where, When spill information
 - "30 gallons 1% HCl at dock 2 spilled 3:30"
- Who will be the onsite contact?
 - Can they write a check/authorized to act?
- How to document incident
 - Photos, notes, electronic
- Who will deal with media?
 - What can they video?
 - Where will they be allowed to go?



Internal response

- Retreat or take action?
 - Notifications
 - Evacuate/Shelter in Place
 - Communicate Evac routes/Shelter Areas
 - Evac/Shelter alarm
 - Accountability/rally point
 - Defensive actions



Taking defensive actions or not

- Operations to contain or slow the release
 - Close valve
 - Apply absorbent
 - Booms, diking, trenching
- Defensive actions are not without risk
- Can reduce size of the spill and cost





- Resources/Emergency Equipment

- Resources

- Copy of the plan
- Communications

- Emergency Equipment

- PPE
- Absorbents
- Booms
- Drain covers
- Shovels





- Training
 - Plan education
 - Learn what could happen
 - People learn their roles
- Exercise
 - Find out if the plan is feasible
 - Find alternate solutions
 - Familiarize participants with tasks
 - Build teamwork





- Use of environmental spill contractors/brokers
- A response may require external help
 - Contractors
 - Experienced
 - Have equipment/supplies
 - Knowledgeable of requirements
 - Access to testing – response/confirmation
 - Brokers
 - Commonly used by transportation industry
 - Handle acquiring a contractor for you



Summary

- Spills will happen
- You can be **proactive** and prepare
 - If it is predictable it is preventable
- Or you can be **reactive** and hope for the best
 - Not a good option
- Preplanning
 - Gives you options
 - Saves time, effort and money
 - Only makes sense



Useful Links

- IDEM Website <https://www.in.gov/idem/>
- IDEM ER Quick Reference
https://www.in.gov/idem/cleanups/files/er_quick_ref_sheet.pdf
- NRC <https://www.epa.gov/emergency-response/national-response-center>
- IDHS <https://www.in.gov/dhs/>
- U.S. EPA Region 5 <https://www.epa.gov/aboutepa/epa-region-5>



Thank you for your time

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Selecting a Spill Contractor



- Some small spills can be handled in-house provided the required planning is done beforehand and the proper equipment is available.
- However some spills due to the nature of the material, quantity released, location of the spill or any number of other factors are better handled by a contractor specializing in spill response.
- Just as with an in-house response, some preplanning will make this approach more effective and cost efficient.



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- Pre-incident
 - Operation assessment – Things to think about
 - Triggers for spill contractor use
 - Size of the spill
 - Material spilled
 - Location
 - Special needs
 - Equipment
 - Financial
 - Overtime
 - Purchases



- Pre-incident
 - Operation assessment – Things to think about
 - Insurance
 - Will your policy provide coverage?
 - Will you need to adjust coverage amounts?
 - Authority
 - Who can authorize spill contractor use?
 - Are they available when needed?



- Other useful resources
- IDEM Personnel
 - Are not themselves spill contractors
 - Can not recommend spill contractors
 - Can provide guidance
- Industry associations
- Previous spill contractor use



- Questions when pre-selecting a spill contractor
 - Response Capabilities
 - Contractor has appropriate supplies and equipment?
 - Contractor has adequate number of employees with applicable skills?
 - Can contractor provide response over multiple operational periods?
 - Will they subcontract response work?
 - Contractor can provide access to required clearance testing?



- Questions when pre-selecting a spill contractor
 - 24/7/365 response capabilities?
 - Location – distance from your spill
 - Can they respond in a reasonable timeframe?
 - Multiple methods of contact
 - 24-hour emergency contact
 - Other non-emergency contacts
 - Cell contacts for project managers
 - Emails



- Pre-Selecting a spill contractor
 - Benefits of pre-selection
 - Preplanning = efficient response
 - Contractor walk through
 - Provides for expedient response
 - Contacts established
 - Communications established Telephone #s/emails
 - Needed supplies/equipment needs preplanned
 - Pre-established contract agreement
 - Time to ask “what if...”
 - Reduced stress in a stressful situation



- So now you have had a spill?
 - Safety-Personnel/ General Public/ Weather conditions
 - 911
 - Assess extent of impact
 - Call the spill contractor
 - Notify the IDEM Spill Line (888)233-7745
 - OSC will communicate with emergency personnel on site
 - OSC may respond to the incident to coordinate response activities
 - Once spill has been stabilized, OSC will work with the company/contractor to remove any impacted soils
 - Spill contractor will take confirmatory samples
 - Final cleanup report detailing incident



- Resources for information on spill contractor pre-selection
 - IDEM Website <https://www.in.gov/idem/>
 - Guidance material
 - Spill contractor location map
 - Quick Reference Guide link



- Summary
 - Spills will happen and there will be a cost to your company and possibly to the environment and public health
 - Some small spills may be handled in-house with facility supplies and personnel
 - Other spills will require the assistance of emergency response personnel and spill contractors
 - Preplanning and preselection of a spill contractor can substantially reduce the impact to the facility, the environment and to public health



Thank you for your time

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