




OREGON DEPARTMENT OF FISH AND WILDLIFE POLICY

Human Resources Division

Title:	Responding to a Hazardous Materials Release	HR_480_16
Supersedes:	Responding to a Hazardous Materials Release, dated September 1, 2004	
Applicability:	All Employees	
Reference:	ORS 468.B.060, OAR 635.410_010 to 635.410.035, 29 CFR 1910-120, EO 92-06	
Effective Date:	May 15, 2012	Approved: 

I. PURPOSE

To ensure consistency with Oregon's response plans and provide for employee safety and health in the event of a hazardous materials release, and to minimize the impact of a hazardous materials spill on employees, the public and natural resources.

II. DEFINITIONS

- A. **DEQ:** Department of Environmental Quality
- B. **EPA:** U.S. Environmental Protection Agency
- C. **HAZMAT INCIDENT:** Uncontrolled or controlled hazardous materials release
- D. **OERS:** Oregon Emergency Response System
- E. **OSHA:** Occupational Safety & Health Administration
- F. **NRDA:** Natural Resources Damage Assessment Coordinator, Wildlife Division

III. POLICY

- A. Incident Response Notification
 - 1. In the event an ODFW employee discovers a HAZMAT spill or the illegal dumping of a hazardous material, the employee shall immediately notify the Oregon Emergency Response System (OERS) via 911 or direct at 1-800-452-0311 or through any ODFW office via radio. The ODFW office receiving this call shall immediately notify OERS. Once notification has been made, the individual discovering the site must take appropriate steps as outlined in the Orange Emergency Response Guidebook (Department of Transportation) which shall be kept in the glove box of all ODFW vehicles. The individual shall seek a safe location upwind of the spill and not attempt to control the release or take any further action unless adequately trained per Section D. The individual shall deny entry into the area until outside emergency responders arrive on the scene and take control.

2. The ODFW employee receiving a call from OERS or the public shall document the report on the Initial Hazardous Materials Spill Initial Report Form. This form provides additional guidance for further notifications.
3. OERS maintains a year round, 24-hour per day watch at the State Emergency Communication Center. Standard operating procedure for OERS is to report spills directly to the NRDA Coordinator. The NRDA Coordinator then notifies the Watershed Biologist or Watershed Manager for the area in which the spill is found. The NRDA Coordinator also notifies the Information and Education Division, Fish Division, the ODFW Safety and Health Manager and the Director, as appropriate.
4. A department Emergency Spill Response Call-Down List with daytime and after hours phone numbers shall be maintained by the Wildlife Division's NRDA Coordinator and updated every six months. The NRDA Coordinator shall keep this list at the ODFW Headquarters and provide OERS with updated copies. Each region shall develop a regional contact list and include it in the working copies of this list. Regional notification lists shall identify currently certified response personnel, alternates and methods to reach these personnel.

B. Initial Assessment and Response

1. Upon notification of an incident, the responding District Fish or Wildlife Biologist is responsible for the initial assessment of the HAZMAT situation. The HAZMAT scene must be a characterized site. A characterized site is one that has had the hazardous material identified PRIOR to ODFW response. The responding Biologist should respond to the Command Post of the incident and determine the following:
 - a) If any ODFW facilities and/or operations will or could be affected by the spill. In situations where ODFW facilities are or may be affected, he/she shall contact the facility and NRDA Coordinator to warn them of the spill and recommend protective measures.
 - b) District biologists or assigned staff responding to a spill are guided in their duties by the department's ODFW Natural Resource Losses Response, Investigation and Wildlife Rehabilitation Procedures Manual., a copy of which is available in all district offices. ODFW employees shall work within an incident command structure established by emergency response personnel or by other agencies responsible for mitigation of the incident. ODFW personnel shall not perform or direct clean-up efforts unless adequately trained in accordance with Section D of this policy.
 - c) If the District Fish and/or Wildlife Biologist is initially responding to a routine kill report and discovers a HAZMAT incident, he/she must initiate an emergency response sequence as outlined in this section. The employee shall secure the area as much as possible, seek a safe location upwind, and await emergency response personnel trained in handling the hazardous material before taking any action outlined in the ODFW Natural Resource Losses Response, Investigation and Wildlife Rehabilitation Procedures Manual.. Trained hazardous material emergency response personnel from local or state organizations will determine the hazards and appropriate protective measures to be taken prior to entry. ODFW staff shall function within an Incident Command (IC) structure at all HAZMAT incidents.

2. The District Biologist may need additional ODFW resources based on the size and impact of the spill. Other ODFW resources might include:
 - a. Activation of the ODFW Spill Response Team for level three incidents (see C below).
 - b. Technical assistance, facility drawings and/or material specifications from Engineering.
 - c. Safety and health coordination and monitoring assistance from the Human Resources Division.
 - d. Activation of wildlife rehabilitation volunteers by the affected region.
3. Responding personnel shall keep the on-scene Incident Commander informed as to ODFW activities on the site.

C. ODFW Spill Response Team

1. The ODFW Spill Response Team may be called into action during a Level 3 response (see Determining the Level of Response in the ODFW Natural Resource Losses Response, Investigation and Wildlife Rehabilitation Procedures Manual.) or if there is actual or potential large quantities of fish or wildlife involved and/or the incident causes long term habitat damage. Spills that result in a high level of public sensitivity may also require activation of the Spill Response Team.
2. The Spill Response Team serves as the ODFW liaison with other state or federal agencies in development of response strategies.
3. The ODFW Spill Response Team consists of the following members:
 - a. The **Natural Resources Damage Assessment Coordinator (NRDA) in the Wildlife Division** provides staff coordination for all spill response activities, including damage assessment, and mitigation, related to fish and wildlife in cooperation with DEQ, EPA, and the On-Scene Coordinator. Acts as information liaison for the Director.
 - b. The **Department Safety and Health Manager** provides consultative services to the Wildlife and Fish Divisions for safety training for ODFW staff as outlined in the following section, as well as selection of appropriate personal protective equipment. He/she consults with other agencies in developing site-specific safety and health plans for HAZMAT sites to comply with OSHA regulations. Acts as an informational resource and liaison for OR-OSHA, Federal OSHA, and ODFW in the event of a spill.
 - c. The **Fish Division's Fish Culture Coordinator** serves as informational resource to the Spill Response Team and a liaison between the Team and the Fish Division.
 - d. The **Information & Education Division's Administrator** coordinates all the Information and Education Division press releases, informational articles and media contacts. He/she coordinates with the on-scene Public Information Officer and coordinates interagency public information.

- e. The **Administrative Services Division's Staff Economist** tracks all expenses incurred as a result of a HAZMAT response. The staff economist researches and provides information on any federally required reimbursement or record forms needed to make damage claims covered by the federal Oil Pollution Act, determines funding sources for ODFW activities, and assists the NRDA Coordinator with damage assessment.
4. An **ODFW Regional Manager** may activate the ODFW Spill Response Team by calling the OERS or the NRDA Coordinator .

D. Training

Staff identified in the department's Emergency Spill Response Call-Down List must be trained to their specific level of response. Employees trained to HAZWOPER responders or the Operations level shall be certified upon successful completion of the training. Re-certification training will be made available annually and coordinated through the region.

1. ODFW Emergency Responder to a spill site
 - a. All ODFW employees who respond to characterized hazardous materials spills shall take 24 hours of training including at least the following:
 - Safety, health, and potential hazards at a working hazardous materials site.
 - The use of personal protective equipment
 - Safe use of engineering controls and equipment used at sites.
 - ODFW work practices at emergency scenes as defined in *the ODFW Natural Resource Losses Response, Investigation and Wildlife Rehabilitation Procedures Manual*.
 - Use of DOT guidebook
 - Reading safety data sheets.
 - Incident Command System
 - Decontamination procedures
 - HAZMAT Emergency scene organization
 - Medical surveillance requirements including the signs and symptoms that may indicate overexposure to a chemical
 - The ODFW workplan and this policy
 - Overview of 1910.120
2. ODFW Response at Hatcheries/Wildlife Areas
 - a. Awareness Training

All staff working in the field may at some time witness a HAZMAT spill or discover illegal dumping of a hazardous material. For this reason, it is important that all field staff have, at a minimum, the "Awareness" level hazardous materials training. Staff certified at this level is trained to recognize a HAZMAT incident and initiate an emergency response sequence. The "Awareness" training is approximately four hours. Staff trained at the Awareness level is not to participate any further in control or clean-up of the material.

b. Operations Training

Operations Training is appropriate for hatchery and wildlife staff. Wildlife areas may use defensive techniques to divert or dam up a spill minimizing damage. Operations Training includes responding in an emergency for the purpose of protecting nearby persons, property or the environment from the effects of a release. Staff trained at the operations level is trained to respond in a defensive fashion without actually trying to stop the release. This would involve deploying absorbent booms at hatchery intakes to prevent hazardous materials from flowing into the water system, making dams to contain the material from sensitive areas, or containing the spill by making a channel to direct the flow. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures. They shall not enter the "hot zone"; rather, they will advise and coordinate only, and do so from a safe location. The Operations Training is approximately eight hours and includes Awareness Training.

E. Medical Surveillance and Consultation

Any ODFW employee who exhibits signs or symptoms that may be a result of exposure to a hazardous substance during the course of an emergency incident, either immediately or subsequently, shall be provided with medical consultation at no cost to the employee. Employees should coordinate this effort with their supervisor and the Safety and Health Manager.

F. Post Emergency Response Critique

After an incident has terminated, ODFW staff shall participate in the local emergency response organizations incident critique. Department response plans and policies shall be updated as necessary as a result of this critique process.

G. Responsibilities

1. All ODFW Staff trained in this policy are responsible to initiate an appropriate emergency response sequence upon discovering a HAZMAT incident regardless of the location.
2. ODFW regions/districts shall investigate HAZMAT spills that result in, or may result in fish and/or wildlife loss or loss of their habitat. Regions/districts shall:
 - a. Determine the cause, management measures required to restore fish and/or wildlife production, and violations of environmental laws.
 - b. Collect samples necessary or direct responders to collect samples if spill is not safe for ODFW personnel to establish proof of fish and/or wildlife loss for future collection of damages from the responsible parties. Guidelines are contained in the ODFW Natural Resource Losses Response, Investigation and Wildlife Rehabilitation Procedures Manual
 - c. Assist other agencies in developing spill management strategies that will minimize the effects of a spill on fish, wildlife and/or their habitat and aid in assessing fish and wildlife damage. This consultation may be provided on-site at the Command Post or off-site at an Emergency Operations Center (EOC).

3. ODFW Fish Hatchery personnel may be required to respond to the hatchery water intakes to protect the hatchery and hatchery products from the effects of a HAZMAT spill.
4. ODFW Headquarters staff shall provide state oversight of public information regarding fish and wildlife impacts and the ODFW response, and coordination with other agencies as needed. The Headquarters Office Spill Response Team responsibilities are duties outlined in Section C of this policy.

Attachment A: Training Requirements for HazMat