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CP3-ES-0003 **FR1**	**TITLE**: Environmental Incident Reporting	Page 1 of 27

DOCUMENT CATEGORY: ☒ Administrative ☐ Technical

LEVEL OF USE: ☒ Information Level ☐ Reference Level ☐ Continuous Use

FUNCTIONAL AREA: Regulatory Compliance **SUBJECT MATTER AREA:** Environmental Management System	**SUBJECT MATTER EXPERT**: Valarie Crabtree, Regulatory Compliance Specialist
NUCLEAR SAFETY REVIEW DOCUMENTATION: N/A Non-intent Changes Only	**APPROVED BY/DATE** (Signature on file): Curt Walker, Environmental Services Director 1/10/2018
REQUIRED REVIEW DATE (or expiration date for temporary change): 1/10/2021	**EFFECTIVE DATE**: 1/17/2018

REVISION/CHANGE LOG

Revision/Change Letter	Description of Changes	Pages Affected	Date of Revision/Change
FR0	Bluesheet	All	10/20/17
FR1	Revision to incorporate bluesheet	All	1/10/2018

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1.0 PURPOSE AND SCOPE

1.1 Purpose

This procedure provides direction for immediate response to environmental incidents and subsequent reporting to the regulatory agencies. It provides guidance on the requirements for the identification and tracking of environmental incidents and notification and reporting of environmental noncompliances that occur during the course of work activities of the Deactivation and Remediation (D&R CONTRACTOR). Environmental noncompliances reported under this procedure include, but are not limited to, releases/spills, permit violations, regulatory compliance violations, failure to implement Environmental Management System (EMS) controls, or other conditions that warrant Regulatory Compliance attention or the attention of any other Four Rivers Nuclear Partnership, LLC, (FRNP) entity.

1.2 Scope

This procedure applies to all D&R CONTRACTOR employees, teaming partner operations, and FRNP subcontractors.

2.0 REFERENCES

2.1 Use References

- CP3-OP-0009, *Performance Observations*
- CP3-QA-1003, *Management and Self-Assessment*
- CP3-QA-2005, *Nonconformance Control*
- CP3-QA-3001, *Issues Management*
- CP3-QA-3005, *Occurrence Reporting*

2.2 Source References

- 40 CFR Part 110, *Discharge of Oil*
- 40 CFR Part 112, *Oil Pollution Prevention*
- 40 CFR Part 116, *Designation of Hazardous Substances*
- 40 CFR Part 117, *Determination of Reportable Quantities for Hazardous Substance*
- 40 CFR Part 302, *Designation, Reportable Quantities, and Notification*
- 40 CFR Part 355, *Emergency Planning and Notification*
- 401 KAR Chapters 5 and 10, *Water Quality*
- Comprehensive Environmental Response, Compensation, and Liability Act of 1980

- CP2-ES-0101, *Environmental Management System*
- CP3-EP-1007, *Oil and Hazardous Materials Spills and Releases*
- DOE Order 231.1B, *Environmental, Safety, and Health Reporting*
- DOE Order 232.2, *Occurrence Reporting and Processing of Operations Information*
- DOE Order 436.1, *Departmental Sustainability*
- DOE Order 458.1, *Radiation Protection of the Public and the Environment*
- Drinking Water Permit—PWS ID#KY0732457
- Enforcement Response Policy for Sections 304, 311, and 312 of the *Emergency Planning and Community Right to Know Act, and Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act*
- *Hazardous Waste Facility Permit—KY8-890-008-982*
- Kentucky Pollutant Discharge Elimination System (KPDES) Permit—KY0004049
- KRS 224.01-400, Environmental Emergencies
- PAD-REG-1005, Spill Prevention, Control, and Countermeasure (SPCC) Plan
- Solid Waste Permit—073-00014, 073-00015, 073-00045
- Title V Permit—V-14-012
- Water Withdrawal Permit—0900

3.0 COMMITMENTS

None

4.0 RESPONSIBILITIES

4.1 Environmental Services Director

Environmental Services Director has organizational ownership and approval for this procedure.

4.2 Plant Shift Superintendent

- Ensures immediate actions to mitigate releases/spills are taken as appropriate and assigns remediation responsibilities to plant organizations as needed for spill cleanup.
- Ensures issues requiring immediate notifications are properly classified and reported.
- Notifies the Regulatory Compliance Manager when notifications to environmental regulatory agencies are made or necessary.
- Determines when the Hazardous Waste Facility Permit (KY8-890-008-982) Contingency Plan is implemented and then follows the plan (see Appendix D, *Incident Response Actions -Hazardous Waste Spill/Release Response*).

4.3 Regulatory Compliance Manager

- Conducts assessments in accordance with CP3-QA-1003, *Management and Self Assessments*, and CP3-OP-0009, *Performance Observations*.
- Recommends actions to mitigate releases and follow-up, as necessary.
- Verifies proper notifications are made by the Plant Shift Superintendent (PSS) and provides support and follow-up for subsequent written notifications and/or reports.
- Ensures follow-up notifications are made, as appropriate.

4.4 Contractor Performance Assurance Program (CPAP) Manager

Assists PSS with occurrence reporting per CP3-QA-3005, *Occurrence Reporting*, and ensures event is entered into Issues Management and corrective actions are tracked to completion per CP3-QA-3001, *Issues Management*.

4.5 Public Affairs

Notifies local news media, as appropriate, of potential impact to the public.

4.6 D&R CONTRACTOR and SUBCONTRACTOR Personnel

All D&R contractor personnel are required to immediately report known or suspected releases or other environmental incidents to the PSS.

5.0 GENERAL INFORMATION

When a release of a hazardous substance or other environmental incident is suspected and/or known to have occurred, a prompt response is necessary to minimize potential impacts to personnel and the environmental.

6.0 INSTRUCTIONS

6.1 Identification and Reporting of Environmental Incidents

<u>D&R CONTRACTOR Personnel and Subcontractors</u>

6.1.1 Promptly report all potential environmental incidents observed in relation to D&R CONTRACTOR or subcontractor activities, no matter how minor, to PSS.

6.1.2 **If** an uncontrolled hazardous material release is suspected, personnel in the area of the suspected release will leave the area immediately and notify the PSS unless specially trained and engaged in the release response by procedure. CP1-EP-1000, *See and Flee Policy*, should be followed.

6.1.3 **If** the environmental incident involves hazardous material or releases, **then** implement See and Flee or SWIMS (Stop, Warn, Isolate, Mitigate, and Secure) policy, as appropriate.

6.1.4 **If** the environmental incident occurs at the Paducah Site **and** requires emergency assistance, **then** immediately contact the PSS by one of the following ways:

- Fire Alarm Pull Box (Caution–not for reporting a hazardous materials release)
- PSS Emergency Phone—333 (Bell) or 555 (PAX)
- Red-Handle Phone
- Radio—Turn knob to position 16; Call for Alpha 1, state, "Emergency Traffic, Emergency Traffic"
- PSS Office—6211, state, "This is an Emergency"
- From a Cell Phone—(270) 441-6333

6.1.5 **If** the environmental incident occurs at the Kevil office **and** requires emergency assistance, **then** immediately contact the Ballard County emergency dispatch center at (270) 335-3691 for emergency fire, medical, or police assistance.

6.1.6 Suspend work, as appropriate, pending investigation **and** determination of immediate corrective actions.

6.2 Spills/Releases

PSS

6.2.1 When a release of a hazardous substance is suspected/or known to have occurred, the PSS shall take actions as outlined in Appendix C, *Incident Response Action*, unless these actions conflict with the approved Emergency Action Plan.

NOTE:
Reportable Quantity (RQ) is based on a 24-hour period (e.g., a release at 1600 on one day must be added to a release at 1200 the next day to determine if an RQ is exceeded). Common Paducah Site reporting criteria and RQs are listed in Appendix H, *Condensed List of Reportable Quantities*.

6.2.2 **If** the release or threatened release is equal to or in excess of RQs listed in Appendix H, **then** determine notification requirements using Appendix I, *Immediate Spill Notification Chart.*

6.2.3 Make immediate verbal notifications to appropriate regulatory agencies per Appendix I and CP3-QA-3005. Typical information required for notification includes the following:

- Substance involved in the release.
- Indication whether the substance is extremely hazardous.
- Estimate of quantity released to the environments.
- Time and duration of the release.
- Medium or media into which the release occurred (i.e., air, water, etc.).

- Known or anticipated health risks associated emergency and advice regarding medical attention for exposed individuals, if necessary.
- Precautions taken as a result of the release such as shelter in place, evacuation, etc.
- Actions taken to respond to and contain the release.
- Name(s) and telephone number(s) of person(s) to be contacted for further information. Document verbal notifications, including agencies notified, time, and case/incident number, if provided by regulatory agency.

6.2.4 Notify Regulatory Compliance if regulatory advice is needed or an RQ is reached. E-mail the spill report to regulatory compliance as soon as time permits.

6.2.5 Notify the U.S. Department of Energy (DOE) Facility Representative if a release reaches or approaches an RQ. Include sufficient detail to describe the condition, any associated equipment, and all immediate actions taken. Notify the CPAP Manager if help is needed with occurrence determinations and reporting.

6.2.6 **If** the environmental incident has the potential to affect outfall discharges adversely, **then** notify the appropriate representatives from DOE, the DOE Infrastructure Contractor, and the DOE prime depleted uranium hexafluoride contractor.

6.2.7 Notify regulatory agencies as per Appendix C and I.

6.2.8 Document verbal notifications, including agencies notified, time, and case/incident number, if provided by regulatory agency. Coordinate with spill owner to initiate an issue according to CP3-QA-3001, *Issues Management.*

NOTE:

Submittal of form CP3-ES-0003-F01, *Spill Report Form*, via e-mail is acceptable as the signed report version. The PSS may choose to use form CP3-ES-0003-F01 or an alternate form as appropriate in cases where a spill or environmental incident poses a safety risk; however, similar information will be recorded. An example of this form is provided in Appendix J, *Spill Report Form*.

Form CP3-ES-0003-F02, *Oil Spill Response Notification Form*, is provided for use only when making an oil spill notification to the National Response Center. All information on the form must be known at the time of notification, **or** be in the process of being collected. Oil spill notification shall NOT be delayed in order to collect the information. An example of this form is provided in Appendix K, *Oil Spill Response Notification Form*.

6.2.9 Complete form CP3-ES-0003-F01 **or** an alternate form as appropriate to include, at a minimum, the following information:

- Date the spill was discovered;
- Specific location of the spill;

- Name of the person making the notification;
- What material was spilled (i.e., Substance involved in the release);
- Amount of material spilled/released;
- Time and duration of the release;
- Medium or media into which the release occurred (i.e., air, water, etc.);
- Any injuries/exposures;
- Appropriate information about equipment involved in the spill (if applicable);
- Any notifications, including agencies notified, time, and case/incident number, if provided by regulatory agency, in an Issue Identification; and
- Name(s) and telephone number(s) of person(s) to be contacted for further information.

6.2.10 Forward a copy of the completed form CP3-ES-0003-F01 or alternate form to Regulatory Compliance and to Contractor Performance Assurance. Send form and any additional requested information to parties verbally notified.

6.2.11 **If** requested by CPAP personnel, **then** provide a copy of the shift log for tracking and trending purposes.

6.3 Other Environmental Incidents

PSS

6.3.1 When an environmental incident is suspected/or known to have occurred, the PSS shall take actions as outlined in Appendix C, *Incident Response Action*, unless these actions conflict with the approved Emergency Action Plan.

6.3.2 Forward any information available to the Regulatory Compliance Subject Matter Expert and to CPAP manager.

6.3.3 For written reports, coordinate response with DOE program lead, Regulatory Compliance, and CPAP, as appropriate.

Regulatory Compliance Personnel

6.3.4 Make follow-up reports to regulatory agencies, as required by regulatory requirements (for example, Clean Air Act, Clean Water Act, Resource Conservation and Recovery Act, Toxic Substance Control Act) or permit requirements (for instance, Title V, Hazardous Waste Facility Permit).

6.3.5 For verbal reports, follow-up with DOE program lead to ensure he/she is aware of the notification.

6.3.6 Assist in completing form CP3-ES-0003-F01 or an alternate or equivalent form as appropriate.

6.3.7 Assist in evaluating for Event Notification/Communication to DOE.

6.3.8 File report information in spill log S:\Env Mgt\Reg Affairs\Reg Comp\spill log.

6.3.9 Record Notices of Violation in the S:\Env Mgt\Reg Affairs\Reg Comp\NOVs folder for tracking.

6.3.10 Develop and/or assemble environmental noncompliance information and special reports (for example, statistics, trend analyses), as requested.

6.3.11 **If** the environmental incident requires corrective action, **then** complete the reporting process in accordance with CP3-QA-3001, *Issues Management* as appropriate.

6.4 Environmental Incident Screening and DOE Reporting

PSS

6.4.1 Review the information provided concerning the environmental incident and evaluate against the occurrence reporting criteria in DOE O 232.2, *Occurrence Reporting and Processing Operations Information*; and CP3-QA-3005, *Occurrence Reporting*.

6.4.2 Notify the CPAP Manager for help with occurrence determinations and reporting if needed.

6.4.3 **If** the reported environmental incident meets occurrence reporting criteria **or** is otherwise identified as a management concern, **then** document via CP3-QA-3005, *Occurrence Reporting*. Determine what early communication will be made to the local DOE Portsmouth/Paducah Project Office representatives in accordance with criteria per DOE O 232.2.

6.4.4 Discuss environmental incidents with a QA representative, as applicable for Price-Anderson Amendments Act (PAAA) compliance using CP3-QA-3004, *Evaluation and Reporting of Potential PAAA Noncompliances*.

CPAP Personnel

6.4.5 Review the information provided concerning the environmental incident and evaluate against the nuclear safety noncompliance reporting criteria using CP3-QA-3004, *Evaluation and Reporting of Potential PAAA/Worker Safety and Health (WSH) Noncompliances*.

NOTE:

This procedure does not go in to details on occurrence reporting although many conditions discussed in the procedure may result in Occurrence Reporting. See CP3-QA-3005, *Occurrence Reporting*.

7.0 RECORDS

7.1 Records Generated

The following records may be generated by this procedure:

- Form CP3-ES-0003-F01, *Spill Report*
- Form CP3-ES-003-F02, *Oil Spill Response Notification Form*
- Follow-up written reports to regulatory agencies.

7.2 Records Disposition

The records are to be maintained in accordance with CP3-RD-0010, *Records Management Process*.

Appendix A – Acronyms/Definitions

B-LEPC – Ballard Local Emergency Planning Committee

CFR *– Code of Federal Regulations*

CPAP – Contractor Performance Assurance Program

D&R- Deactivation and Remediation

DOE – U.S. Department of Energy

EAPs – Emergency Action Plans

EIR – Environmental Incident Report

EMS – Environmental Management System

EPA – Environmental Protection Agency

FRNP – Four Rivers Nuclear Partnership, LLC

HF – hydrofluoric acid

HWFP - Hazardous Waste Facility Permit

I-LEPC – Massac, Illinois Local Emergency Planning Committee

KAR *– Kentucky Administrative Regulation*

KERC – Kentucky Emergency Response Commission

KERT – Kentucky Environmental Response Team

KDEP – Kentucky Department for Environmental Protection

KPDES – Kentucky Pollutant Discharge Elimination System

KRS – Kentucky Revised Statute

M-LEPC – McCracken Local Emergency Planning Committee

NTU – nephelometric turbidity unit

PAAA – Price-Anderson Amendment Act

PCB – polychlorinated biphenyl

Appendix A – Acronyms/Definitions (continued)

PSS – Plant Shift Superintendent

QA – Quality Assurance

RCRA – Resource Conservation and Recovery Act

RQ – Reportable Quantity

SAA – Satellite Accumulation Area

SARA – Superfund Amendment and Reauthorization Act

SPCC – Spill Prevention, Control, and Countermeasure Plan

SWIMS – Stop, Warn, Isolate, Mitigate, Secure

WSH – Worker Safety and Health

Appendix A – Acronyms/Definitions (continued)

Environmental Incident—Releases or spills to the environment as well as each violation of environmental statutes, regulations, permits, or enforceable regulatory agreements identified by or reported to state or federal agencies. This definition also includes any situation requiring notification to a regulatory agency. Examples include but are not limited to environmental spills, treatment system upsets/bypasses, boiler malfunctions, changes in Outfall discharge color/smell, discovery of abandoned materials/chemicals, receipt of notices of violation, failing to label wastes, etc. If uncertain, contact Regulatory Compliance for guidance.

Extremely Hazardous Substances—The extremely hazardous Substances are regulated under the Emergency Planning and Community Right to Know Act (EPCRA) are listed in 40 *CFR* Part 355, Appendix A. **Hazardous substance—**Means any substance or combination of substances, including wastes of a solid, liquid, gaseous, or semisolid form, that because of its quantity, concentration, or physical, chemical, or infectious characteristics may cause or significantly contribute to an increase in mortality or an increase in serious irreversible or incapacitating reversible illness, or pose a substantial present or potential hazard to human health or the environment. Listed in Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 40 *CFR* § 302.4. **Immediate Notification**—Environmental incidents that require immediate notification to local, state, or federal agencies are to be reported within 15 minutes of obtaining reasonable knowledge that a release has exceeded, or threatened to exceed, the reportable quantities.

Off-site Impact—Is a release or spill of that has or will leave the site boundary and have detrimental impact.

Release—Means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing hazardous substances, pollutants, or contaminants into the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance, pollutant, or contaminant, but excludes emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine; the release of source, by-product, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954, if the release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under Section 170 of the Act, or any release of source by-product, or special nuclear material from any processing site designated under Sections 102(a)(1) or 302(a) of the Uranium Mill Tailing Radiation Control Act of 1978; and the normal application of fertilizer.

Release/Spill to the Environment—Means a release to waters of the Commonwealth, land surface, surface, and subsurface soils and strata, or ambient air within the Commonwealth or under the jurisdiction of the Commonwealth.

Reportable Quantity (RQ)—Amount of a hazardous substance, extremely hazardous substance, or oil [as defined in 40 *Code of Federal Regulations* (*CFR*) Part 112, "Oil Pollution Prevention"; 40 *CFR* Part 302, "Designation, Reportable Quantities and Notification"; and 40 *CFR* Part 355, "Emergency Planning and Notification"] that, if released to the environment within a 24-hour period, requires notification to regulatory agencies. Reportable quantities for oil, hazardous substances, and extremely hazardous substances at the Paducah Site are listed in Appendix D, "Condensed List of Reportable Quantities." The RQ release includes all releases of a hazardous substance within a 24-hour period.

Threatened Release—A release of a hazardous substance in which an RQ is not exceeded, but significant potential exists to exceed a RQ.

Appendix B - INCIDENT RESPONSE ACTIONS - Oil or Diesel Spill/Release Response

IMMEDIATE ACTIONS

1. Control, contain, and confine spill.
2. Determine volume of spill.
3. **IF** spill equaled/exceeded a RQ or threatens to exceed a RQ, **THEN** immediately report in accordance with Appendix I, Immediate Spill Notification Flow Chart.
4. **IF** oil spill is more than 25 gal or a diesel spill is greater than 75 gal, **THEN** it is immediately reportable to the Commonwealth of Kentucky (Refer to Appendix I).
5. **IF** oil or diesel spill is greater than 55 gal, **THEN** go to emergency procedure CP3-EP-1007, *Oil and Hazardous Materials Spills and Releases*, for subsequent actions.
6. **IF** oil or diesel spill has caused an off-site visible sheen or emulsion, **THEN** it is reportable to the National Response Center and the Commonwealth of Kentucky (Refer to Appendix I).
7. Spills or releases that cause harm to environment (i.e., fish kills, vegetative damage, etc.) not covered under the actions above, require immediate notification to the Commonwealth of Kentucky Environmental Response Team (KERT).
8. If response to oil or diesel spill exceeds or threatens to exceed the capacity of D&R Contactor Emergency Response Organization (ERO), PSS/IC evaluate need for activation of Oil Spill Response Organization (OSRO) and initiate, if deemed necessary.
   - Primary Contact - SWS Environmental Services (877) 742-4215
   - Backup Contact - First Response (800) 914-9111
9. Refer to PAD-REG-1005, *Spill Prevention, Control and Countermeasure Plan*, for additional guidance.
10. Form CP3-ES-0003-F02, *Oil Spill Response Notification Form*, is provided for use only when making an oil spill notification to the National Response Center. All information on the form must be known at the time of notification, **or** be in the process of being collected. Oil spill notification shall NOT be delayed in order to collect the information.

Reportability

An oil spill that creates an off-site oil sheen or emulsion on or below the surface of the water at an outfall or is greater than 25 gal is immediately reportable in accordance with Appendix I.

A diesel spill that creates an off-site oil sheen or emulsion on or below the surface of the water at an outfall or is greater than 75 gal is immediately reportable in accordance with Appendix I.

SUPPLEMENTARY ACTIONS

Utilize site procedures to clean up the spill and return the area to normal conditions.

The Cabinet may require a follow-up release notification if so, it will be required within 7 days of the cabinets request for a report (KRS 224.01- 400).

Appendix C - INCIDENT RESPONSE ACTIONS - Hazardous Material Spill/Release Response

IMMEDIATE ACTIONS
1. Evacuate area to a safe distance from the spill and control access in accordance with applicable Emergency Action Plans (EAPs). 2. Control, contain, and confine spill. 3. Determine volume of spill. 4. **IF** spill equaled/exceeded a RQ or threatens to exceed a RQ, **THEN** immediately report in accordance with Appendix I. 5. Spills or releases that cause harm to environment, i.e., fish kills, vegetative damage, etc., not covered under Action 4 require immediate notification to the Commonwealth of Kentucky Environmental Response Team (KERT). **<u>Reportability</u>** Spills or releases in volumes that equal or exceed a RQ are immediately reportable in accordance with Appendix I.
SUPPLEMENTARY ACTIONS
Utilize site procedures to clean up the spill and return the area to normal conditions.

Appendix D – INCIDENT RESPONSE ACTIONS – HAZARDOUS WASTE/SPILL RESPONSE

IMMEDIATE ACTIONS

1. Evacuate area to a safe distance from the spill and control access in accordance with applicable EAPs.
2. Control, contain, and confine spill.
3. Determine volume of spill.
4. **IF** PSS determines that the spill/release exceeds an amount more than a minor amount handled by the waste operations personnel, **THEN** immediately implement the Hazardous Waste Facility Permit (HWFP) Contingency Plan (Part G of Application).
5. **IF** spill to the environment exceeded 1 pound from a RCRA Facility or Satellite Accumulation Area (SAA), **THEN** per HWFP Condition II.F.7, immediately notify the twenty-four (24) hour Kentucky Environmental Response telephone numbers (502) 564-2380 or (800) 928-2380.
6. **IF** spill equaled/exceeded a RQ or threatens to exceed a RQ, **THEN** immediately report in accordance with Appendix I. Spills or releases that cause harm to environment, i.e., fish kills, vegetative damage, etc., not covered under Action 4 require immediate notification to the Commonwealth of Kentucky Environmental Response Team (KERT).
7. **Spills or releases that cause harm to the environment, i.e., fish kills, vegetative damage, etc., not covered under Actin 4 require immediate notification to the Commonwealth of Kentucky Environmental Response Team (KERT).**

Reportability

Spills or releases from a RCRA Facility or SAA in volumes that exceed 1 pound or spills from non-RCRA facilities equal to or exceeding a RQ are immediately reportable in accordance with Appendix I.

A report is due to KDEP within 30 days of detecting a release to the environment from a RCRA-regulated unit (HWFP) Condition II.F.8.

SUPPLEMENTARY ACTIONS

Utilize site procedures to clean up the spill and return the area to normal conditions.

Implement Contingency Plan for any major spills/releases requiring emergency response.

Appendix E – INCIDENT RESPONSE ACTIONS – DRINKING WATER TREATMENT TECHNIQUE VIOLATION RESPONSE

IMMEDIATE ACTIONS

1. Initiate corrective actions immediately to return the system to normal.
2. **IF** loss of disinfection (chlorine concentrations of potable water entering the drinking water distribution system falls below 0.2 mg/l) **THEN**:
    a. Issue a boil water notice to all facility employees served by the potable water system.
    b. Follow reportability instructions below.
    c. Notify Regulatory Compliance.

1. **IF** potable water turbidity entering the distributions system exceeds 1.0 nephelometric turbidity unit (NTU), **THEN** perform the following actions:
    a. Notify Regulatory Compliance.
    b. Ensure reporting instructions below are followed.

Reportability

1. Loss of chlorination is to be reported to the Kentucky Division of Water as soon as possible.
2. The Kentucky Division of Water must be notified when drinking water turbidity exceeds 1.0 NTU as soon as possible, but no later than 24 hours after occurrence.
3. All distribution system line breaks or ruptures that cause the pressure in the distribution system to fall below 20 psi or require more than 8 hours to repair must be immediately reported to the Kentucky Division of Water.

SUPPLEMENTARY ACTIONS

1. Utilize site procedures to restore the drinking water system to normal operating conditions.
2. Environmental Compliance follows up the initial notifications with written reports as necessary.

Appendix F – INCIDENT RESPONSE ACTIONS – SEWAGE TREATMENT UNIT BYPASS/OVERFLOW/UPSET RESPONSE

IMMEDIATE ACTIONS

1. Control, contain, and confine release in accordance with utility procedures.
2. **IF** sewage is draining to a ditch or to a drain that leads off-site, **THEN** take the following additional actions:
    a. If possible, stop release by sand bagging, placing spill booms, etc.
    b. Notify Regulatory Compliance to evaluate need for effluent sampling.

Reportability

1. Spills or releases of untreated sewage to the environment are reportable to the Kentucky Division of Water within 24 hours of initiation of the release if a KPDES permit limit is exceeded.
2. Notify Regulatory Compliance to determine notification requirements and initiate if required.

SUPPLEMENTARY ACTIONS

1. Utilize site procedures to clean up the spill and return the area to normal conditions.
2. Regulatory Compliance follows up the 24-hour report with written reports as necessary.

Appendix G – INCIDENT RESPONSE ACTIONS – PCB SPILL/RELEASE RESPONSE

IMMEDIATE ACTIONS

1. Control, contain, and confine spill or leak.
2. Verify the material is PCB and take additional actions as specified in procedure CP3-WM-0034, *PCB Spill Management*.
3. Determine volume and concentration of spill.
4. **IF** spill exceeded an RQ or threatens to exceed an RQ, **THEN** immediately report in accordance with Appendix I.
5. Initiate spill cleanup within 24 hours.

Reportability

NOTE:

Only spills of PCBs at concentrations of 50 ppm or greater or from a source of PCBs at 50 ppm or greater are reportable.

6. Spills of PCBs to the environment in quantities greater than 1 lb by weight are reportable in accordance with Appendix I.
7. Spills of PCBs, even when fully contained, in quantities greater than 10 lb by weight are reportable (reference 40 *CFR* § 761.125(a)(1)(iii)) in accordance with Appendix J.
8. Spills of PCBs, in any quantity, that contaminate surface waters or sanitary sewers are reportable to EPA Region IV at 404-562-8490 within 24 hours.

SUPPLEMENTARY ACTIONS

Utilize site procedures to clean up the spill and return the area to normal conditions.

Implement CP3-WM-0034, *PCB Spill Management*, for all PCB spills.

Appendix H - CONDENSED LIST OF REPORTABLE QUANTITIES (RQS) (CERCLA and SARA)

MATERIAL	RQ
Asbestos (friable)	1 lb
Chlorine	10 lb
Ethylene Glycol	5,000 lb
Ferric Sulfate	1,000 lb
Ferrous Sulfate	1,000 lb
Fluorine	10 lb
Hydrochloric Acid	5,000 lb
Hydrofluoric Acid (HF)	100 lb
Nitric Acid	1,000 lb
PCB	1 lb
Potassium Hydroxide	1,000 lb
Sodium Hypochlorite (bleach)	100 lb
Sodium Hydroxide	1,000 lb
Sulfuric Acid	1,000 lb
Uranium Hexafluoride (equivalent to uranium RQ of 0.1 Ci at 5.5% assay)	85 lb

*PCB RQ of 1 lb is for releases with the potential to reach the environment; for fully contained PCB spills the RQ is 10 lb per 40 *CFR* § 761.125(a)(1)(iii).

Hazardous waste released from a Resource Conservation Recovery Act facility or a SAA to the environment, the RQ is 1 lb.

A release of PCB from its container even if into secondary containment the RQ is 10 lb.

COMMONWEALTH OF KENTUCKY ONLY	RQ
Petroleum Products (oil, kerosene, gasoline, etc.)	25 gal
Diesel Fuel	75 gal

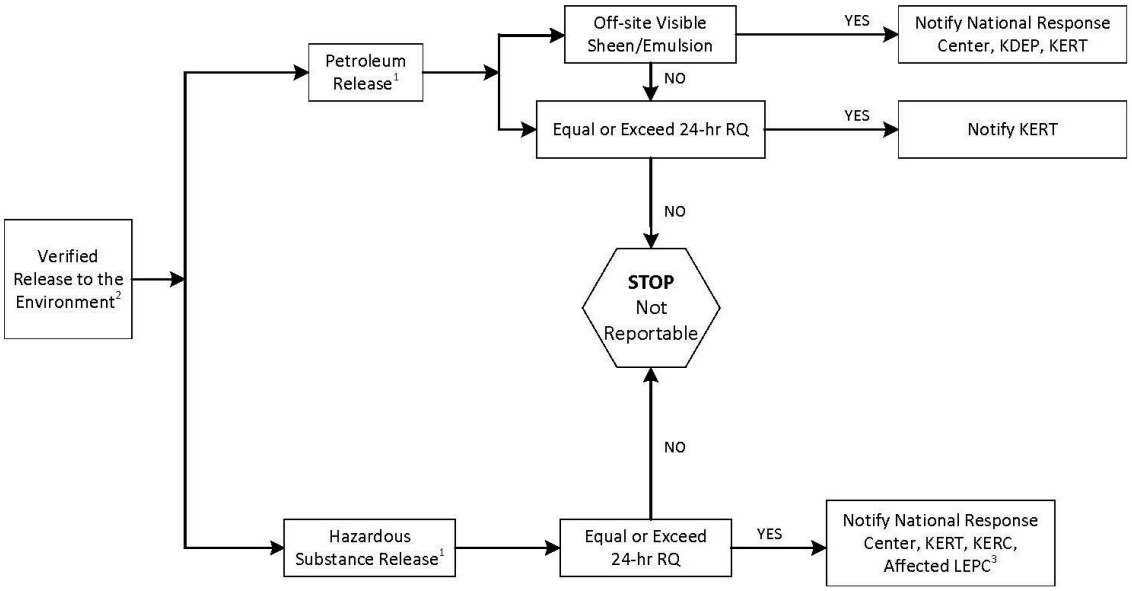
NOTE:

For chemical substances, including hazardous wastes not listed here, See 40 *CFR* Parts 302 and 355.

Chlorine trifluoride does not have an identified RQ; however, it may be mixed with fluorine, which does have an identified RQ.

Appendix I – IMMEDIATE SPILL NOTIFICATION CHART

IMMEDIATE SPILL NOTIFICATION FLOW CHART



Note 1: If the release only threatens the RQ, then the only notification required is to KERT.
Note 2: Regardless of location, all releases of PCBs in quantities ≥ 10 lb must be reported to the National Response Center immediately and to the EPA Region 4 within 24 hours.
Note 3: If event affects Illinois, the IERC and Massac County LEPC also should be notified, as applicable.

National Response Center.....800-424-8802
Kentucky Emergency Response Team (KERT).....800-928-2380 or 502-564-2380
Kentucky Department for Environmental Protection (KDEP).....270-898-8468
Kentucky Division of Water.....502-564-3410
Kentucky Emergency Response Commission.....800-255-2587 or 502-607-1638
Ballard Local Emergency Planning Committee (B-LEPC).....270-335-3691
McCracken Local Emergency Planning Committee (M-LEPC).....270-448-1530 or after hours 911
Environmental Protection Agency (EPA), Region 4.....404-562-8490
Massac, Illinois, Local Emergency Planning Committee (I-LEPC).....618-524-2002 (Day) or 618-524-2918 (Night)

Appendix J – CP3-ES-0003-F01 – SPILL REPORT FORM

SPILL REPORT FORM	
Project:	
Date/Time spill discovered:	
Brief Description of Event:	
Has the release been controlled:	
Location of the spill:	
What material was spilled?	
What is RQ for material?	
Amount of material released:	
Medium or media into which the release occurred (i.e., air, water, etc.):	
Any injuries/exposures:	
Equipment involved in the spill (if applicable):	
Notifications made:	
Immediate measures/controls to clean-up/mitigate release:	
Clean-up complete?	
Other information:	
Person reporting spill:	
Contact for additional info:	

EXAMPLE

Appendix K - CP3-ES-0003-F02 - OIL SPILL RESPONSE NOTIFICATION FORM

NOTE: Under no circumstances will the notification concerning a spill or release be delayed to collect additional information for completing this checklist.

Reporter's Last Name: _____ First: _____ M.I. _____

Position or Title: _____ Organization Type: _____

Company: _____

Address: _____ City: _____ State: _____ Zip: _____

Phone Number – Day: _____ Evening: _____

Were Materials Discharged? _____ Confidential materials? (yes/no) _____

Is report meeting federal obligation? (yes/no) _____ Date called: _____ Time called: _____

Calling for the responsible party: (yes/no) _____ Date called: _____ Time called: _____

Incident Description:

Source and/or Cause of Incident: _____

_____

Date of Incident: _____ Time of Incident: _____ AM/PM: _____

Incident Address/Location: _____

Nearest city: _____ State: _____ County: _____ Zip: _____

Distance from city: _____ Units of Measure: _____ Direction from City: _

Section: _____ Township: _____ Range: _____ Borough: _____

Container type: _____ Tank oil storage capacity: _____ Units: _____

Facility oil storage capacity: _____ Units: _____

Facility latitude: Degrees: _____ Minutes: _____ Seconds: _____

Facility longitude: Degrees: _____ Minutes: _____ Seconds: _____

Materials spilled or released: _____

_____

_____

CHRIS Code	Discharged Quantity	Unit of Measure	Material Discharged in Water	Quantity	Unit of Measure

EXAMPLE

Appendix K - CP3-ES-0003-F02 - OIL SPILL RESPONSE NOTIFICATION FORM (continued)

Response Action:

Describe actions taken to correct, control, or mitigate the incident: _____

_____

_____

_____

_____

_____

Describe impact of release on the facility:

Number of injuries: _____ Number of deaths: _____

Were there evacuations? (yes/no) _____ Number that were evacuated _____

Was there any damage? (yes/no) _____ Approximate damage in dollars: _____

Medium Affected: _____

Description of the damage: _____

_____

_____

_____

Additional information about the affected medium: _____

_____

_____

_____

Any information about the incident not recorded elsewhere in the report: _____

_____

_____

_____

Caller Notifications: (yes/no)_____

National Response Center: _____ Department of Energy: _____

Environmental Protection Agency: _____ United States Coast Guard: _____

Kentucky Environmental Response Team: _____

List Others: _____

_____

_____

_____

EXAMPLE