



**1.0 Purpose & Scope**

The purpose of this procedure is to provide emergency response for spills of hazardous materials in 90-day storage areas and designated satellite accumulation areas. Hazardous Waste storage is outlined in the *GSA Region 8 Hazardous Waste Management Environmental Procedure*. The focus of this procedure is the two 90-day storage areas at the Denver Federal Center (DFC), located at Building 11 and 47.

**2.0 Activities & Departments Affected**

This procedure affects all GSA personnel and contractors who work with chemicals or materials at GSA facilities in Region 8.

**3.0 Exclusions**

None

**4.0 Forms Used, Reporting Required: (include reporting requirements)**

In the event of an emergency call 911.

**Federal and State Forms and Permits:**

PERMIT / FORM / REPORT	SUBMITTED TO: FEDERAL OR STATE AGENCY	SUBMITTAL FREQUENCY
<b>Plan</b>		
RCRA Emergency Response & Contingency Plan <sup>(3)</sup> [GSA Building 11 and 47, 90-day Storage Area, DFC]	Local fire department (for DFC: West Metro Fire Rescue), Local Emergency Planning Committee (LEPC)	Updated as needed
<b>Spill/Incident Reports</b>		
EPA Incident Report	U.S. Environmental Protection Agency - Region VIII	Per Incident
National Response Center Incident Report	National Response Center (if spill exceeds reportable quantities)	If spill exceeds reportable quantities/Per Incident
State Agency Incident Report	<sup>(1)</sup> Colorado Department of Public Health & Environment	Per Incident
Local Sanitary Sewer District Incident Report	<sup>(1,2)</sup> Metro Wastewater Reclamation District (For Discharge to Sanitary Sewer)	Per Incident

<sup>(1)</sup> Listed agencies pertain to the Denver Federal Center.

<sup>(2)</sup> 303-286-3000 during Work Hours

<sup>(3)</sup> Contingency Plan Notification Form EPA ID#: CO05670990105 [also referred to as the Emergency Information EPA ID#]; for the DFC

**In-house GSA Region 8 and Contractor Forms:**

**5.0 Acronyms, Abbreviations, and Definitions**



Acronyms	Meaning
CDPHE	Colorado Department of Public Health and Environment
CFR	Code of Federal Regulations
CO	Contracting Officer
DFC	Denver Federal Center
COR	Contracting Officers Representative
EPA	Environmental Protection Agency
EPG	Environmental Programs Group
FPS	Federal Protective Services
GSA	General Service Administration
HWP	Hazardous Waste Program
RCRA	Resource Conservation and Recovery Act
WMD	Weapons of Mass Destruction
WMFR or WM	West Metro Fire Rescue

Definitions: None

## 6.0 Procedure

**State Specific Procedures & Requirements** [refer to individual State Legal Reviews for details on Statues, Laws, and Rules]:

STATE REGULATORY AGENCY	REQUIREMENT
Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division	Hazardous Waste Regulations are listed under <a href="#">6 CCR 1007-3</a> ; Standards Applicable to Transporters of Hazardous Waste are listed under <a href="#">6 CCR 1007-2</a>
	<a href="#">Colorado Regulations that are More Stringent than the Federal Regulations</a> ; January 2007: Colorado regulations are more stringent with regard to handling, storage and disposal of wastes.
	<b>CDPHE Consent Order with GSA at DFC:</b> 96-04-11-01: Implement groundwater containment system at the eastern boundary of the Denver Federal Center (DFC) to prevent further off-site migration of contaminated groundwater [Signed: 04/11/1996]
	<b>CDPHE Consent Order with GSA at DFC:</b> 97-07-18-01: Sitewide assessment of all contamination resulting from activities conducted at the DFC [Signed: 07/18/1997]
Montana Department of Environmental Quality, Permitting and Compliance Division	Hazardous Waste Program: Controls all hazardous wastes that are generated within, or transported to Montana for the purposes of storage, treatment, and disposal or for the purposes of resource conservation or recovery; <a href="#">ARM 17.53</a>
North Dakota Department of Health, Environmental Health Section, Waste	Regulates the generation, treatment, storage, recycling, transportation and disposal of hazardous waste

STATE REGULATORY AGENCY	REQUIREMENT
Management Division; <a href="#">Hazardous Waste Program</a> (HWP)	and used oil; the HWP implements the requirements of the Resource Conservation and Recovery Act (RCRA) in place of the federal Environmental Protection Agency.
South Dakota Department of Environment and Natural Resources, Division of Environmental Services; <a href="#">Hazardous Waste Program</a>	Adopts the federal hazardous waste regulations by reference. This means that South Dakota's rules cite the federal regulations and are no more stringent than the EPA hazardous waste regulations.
Utah Department of Environmental Quality, Division of Solid and Hazardous Waste, <a href="#">Hazardous Waste Branch</a>	Hazardous Waste Permits, Hazardous Waste Generator Requirements, Recordkeeping and Reporting, Compliance with the Manifest System and Recordkeeping, Contingency Plan and Emergency Procedures, Hazardous Waste Treatment, Storage, and Disposal, Spill Clean-Up, Standards for the Management of Specific Hazardous Wastes and Specific Types of Hazardous Waste Management Facilities
Wyoming Department of Environmental Quality, Solid and Hazardous Waste Division; <a href="#">Hazardous Waste Rules</a>	Chapter 1-2 Hazardous Waste, Chapter 3-7 Hazardous Waste (Permits), Chapter 8-12 Hazardous Waste (Standards)

(1) Contact John Kleinschmidt at 303-236-2858 (cell phone: 303 868-0795) or Mr. Michael Gasser, 303-236-2791 for technical assistances.

**Standardized Procedure:**

6.1 Comply with all federal regulations and where applicable state regulations and local ordinances. Where required comply with reporting requirements.

6.2 Evacuate:

All evacuations should be done upwind. Evacuation is the standard procedure for all types of hazardous materials incidents. The facility evacuation plan is contained in GSA's Occupant Emergency Plan.

Situations which would warrant partial or complete evacuation of the area are as follows:

<u>Explosions</u>	May result in airborne debris including container fragments and hazardous wastes. Minimum safe distance from flying fragments is 2,000 feet.
<u>Spills or Chemical Reactions</u>	May result in highly toxic fumes. Evacuate personnel based on above criteria. Possible evacuation of persons working or living downwind of the facility may be necessary.
<u>Fire</u>	When it cannot be contained and is spreading to other parts of the facility or when it could generate toxic fumes.



**Evacuate Immediate Area:**

If potential exists for heat-induced explosions, evacuate area to a safe distance (at least 2,000 feet) in all directions from the fire.

**Routes:**

Occupants exit building through the nearest exit as per building evacuation plan and meet at designated meeting area.

Before operations are resumed in the affected areas, the emergency response personnel will assess the situation and conditions to determine when it is safe to re-enter the building.

At the Denver Federal Center (DFC):

- The GSA Industrial Hygienist and WMD/HazMat Coordinator will or may be in the assessment process.

6.3 Emergency Response

- IMMEDIATELY UPON DISCOVERY OF AN IMMINENT OR ACTUAL EMERGENCY, CONTACT 911

At the DFC contact:

- THE WMD/HazMat COORDINATOR
- The Mega Center at 303-236-2911 to inform the Federal Protective Service (FPS) of the situation
- Notify facility personnel. Summons the local Fire Department 911, at DFC: West Metro. Account for all personnel. Determine if there are any injuries.
- Notify emergency response and reporting agencies listed in the 90-day Storage areas RCRA Emergency Response & Contingency Plan, also listed below.
- Identify:
  - the character                      ○ exact source
  - amount                              ○ extent of any released material
- If the spilled material is flammable, turn off ignition and heat sources but not lights or electrical equipment, then call the fire department.
- Attend to any person who needs medical assistance or who may have been contaminated. Evacuate the facility in accordance with the GSA Occupant Emergency Plan. Federal Protective Services will be responsible for update and implementation of the plan.
- Assess hazards to the environment and human health, including direct and indirect effects from fires, explosions, and spills (e.g., toxic, irritating, asphyxiating vapors or gases, surplus water runoff, etc.).

**DURING THE EMERGENCY CONTROL PHASE,  
THE EMERGENCY COORDINATOR MUST:**



- Take measures to ensure the incident does not recur or spread to other hazardous material areas at the facility. Shut down operations and evacuate building if necessary.
- Criteria for facility evacuation:
  - Small quantity release: Release with low potential of spreading beyond the room or beyond a 20-foot radius from the source of the release; evacuate personnel in the room or the storage area.
  - Medium quantity release: Release with potential of spreading to adjacent rooms or beyond a 20 foot radius from the source of the release; evacuate personnel in the room where the release occurred and the adjacent rooms in the building or fenced storage area.
- How facility personnel will be evacuated: Personnel will walk unless disabled, in which case they will be assisted by other personnel evacuating facility.  
At the DFC, neither 90-day storage area is non-occupied:
  - Building No. 11, rooms 2, 3, 6, and 7
  - Building No. 47, West Fenced Storage Area*Any personnel entering either the DFC 90-day storage area will have appropriate RCRA and OSHA training to enter a Large Quantity Generator 90-day hazardous waste storage area.*
- The control of the spread of a release of hazardous materials or contaminants will be coordinated by the response team commander.
- The GSA Buildings Manager will coordinate any necessary utilities shutdown. *The location of sewers, damming/ booming locations, utilities shutoffs, etc. will be provided by GSA personnel to the Emergency Coordinator or designated response team/incident commander, as necessary.*

6.4 A copy of the spill response plan is placed in each 90-day storage area.

At the DFC:

- Building No. 11 in the door pouch on the outside of each room,
- Building No. 47 in a marked yellow over-pack drum located in the northeast corner of the enclosure.

6.5 Spill Response for Individuals Without Spill Response Training

An individual **without** spill response training who observes a spill **shall immediately**:

- Evacuate the area of all personnel that could potentially be impacted
- Pull fire alarm and/or Call 911 to report the spill
  - At the DFC call the Mega Center at 303-236-2911 to inform the FPS of the situation
- Call the Region 8 GSA Environmental Programs Group (EPG)



- EPG Manager, Mr. John Kleinschmidt, 303-236-2858 (cell phone: 303 868-0795); or Mr. Michael Gasser, 303-236-2791
- Stay clear of the area until trained personnel arrive.
  - DFC Hazardous Material Emergency Response Team: West Metro Fire

#### 6.6 Individuals Trained To Respond To Minor Spills

These are spills which the person has been trained and is comfortable in handling. The individual should only attempt to clean up this spill if they have been trained to do this work and have knowledge in how to appropriately handle the chemicals involved. Under no circumstance should personnel attempt to clean up the spill if they are not trained to respond.

- These generally are in quantities of less than 2-3 gallons or 10 pounds.

If environmental media is 30 gallons of ground water or less than a 55-gallon drum of soils associated with potentially contaminated material. The individual should:

- Put on personal protection equipment if required
- Secure the area to prevent others from being exposed
- Initiate clean up
- Protect further spread of chemicals
- Notify appropriate management
- Call the Region 8 GSA EPG
  - EPG Manager, Mr. John Kleinschmidt, 303-236-2858 (cell phone: 303 868-0795); or Mr. Michael Gasser, 303-236-2791
- Appropriately containerize cleaned up waste, appropriately label, and store in a designated 90-day storage area:
  - At the DFC that is Building 11

#### 6.7 Major Spills or Spills Involving Highly Hazardous Materials

All trained and untrained personnel should respond similarly as if towards “untrained minor spills (Section 6.5)”. They shall:

- Evacuate the area of all personnel that could potentially be impacted
- Pull fire alarm and/or Call 911 to report the spill
  - At the DFC call the Mega Center at 303-236-2911 to inform the FPS of the situation
- Call the Region 8 GSA EPG
  - EPG Manager, Mr. John Kleinschmidt, 303-236-2858 (cell phone: 303 868-0795); or Mr. Michael Gasser, 303-236-2791
- Stay clear of the area until trained personnel arrive.
  - DFC Hazardous Material Emergency Response Team: West Metro Fire

#### 6.8 Reporting

Complete the Emergency Notification Form and Contingency Plan Notification Form if quantities exceed the EPA reportable quantities or a discharge occurs to



the Agricultural Ditch, Welch Ditch, McIntyre Gulch, or a drainage into these water bodies. EPG maintains the completed forms.

**7.0 Records Management**

Completed Emergency Notification and Contingency Plan forms

**8.0 References**

GSA’s Occupant Emergency Plan

J. J. Keller & Associates, Inc., 2008, 2008 Emergency Response Guidebook, [Use most recent version]

J. J. Keller & Associates, Inc., 2005, Hazardous Materials Compliance Pocketbook, 550 pages. [Use most recent version]

Office of the Federal Environmental Executive, Executive Order 13148: Greening the Government Through Leadership in Environmental Management; Part 5: Emergency Planning, Community Right-To-Know, and Pollution Prevention (Sec. 501. Toxics Release Inventory/Pollution Prevention Act Reporting), William J. Clinton, the White House, April 21, 2000

U.S. Environmental Protection Agency, NEIC Library: 303-236-6136 (TOMES, OHS MSDS, Chemical Information Service and other databases)

U.S. Environmental Protection Agency [Administering Agency], Resource Conservation and Recovery Act (RCRA) of 1976; 42 U.S.C. § 6901 et seq, as amended by the Federal Facility Compliance Act. [Statute]; 40 CFR 148, 239- 282 {283-299 revised} [Regulation]; Section 6002 of RCRA (42 USC 6962)

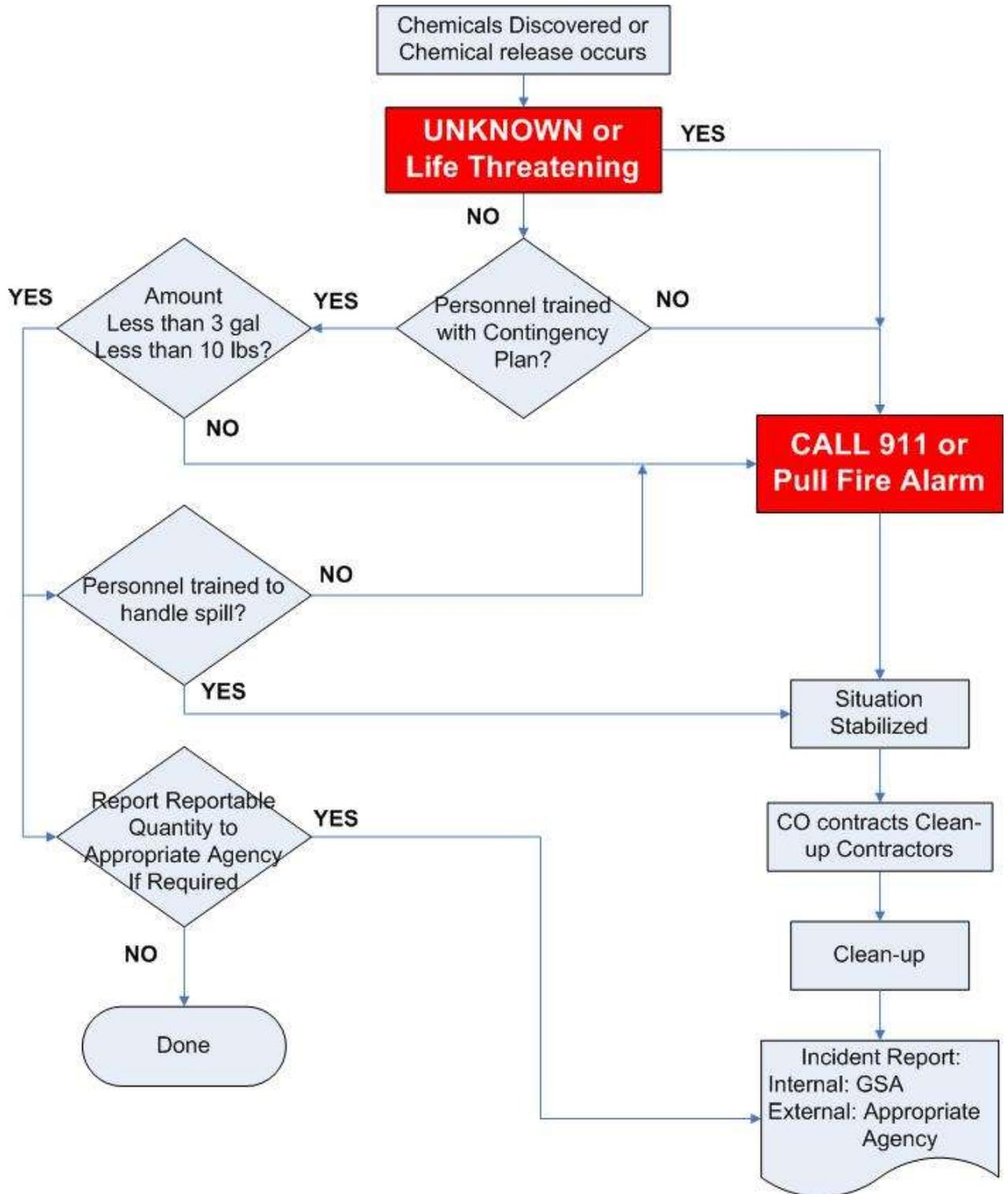
**9.0 Appendices**

Attachment A: 90-Day Storage Area Emergency Hazardous Waste Spill Response Flowchart

<b>Document Control Information:</b>	<b>Approved &amp; Dated:</b>
90-day Storage Area-HazWaste Spill Resp “Month-Date-Year”.doc	 10/15/2010

<b>Document Revision and Update:</b>		
<b>Revision Date</b>	<b>Nature of Revision</b>	<b>Revision made by:</b>
12/22/2005	Working Draft	Mike Gasser
03/16/2006	Original Release	Mike Gasser
01/21/2010	Add ISO 14001 Document Controls	Robert Melvin
02/01/2010	Incident report requirements added, DFC-centric, emergency contact numbers updated	Mike Gasser
06/28/2010 through 10/15/2010	Add regional and state regulations, add Flowchart, outline Region 8 requirements, reorganize order of sequence of procedural steps	Mike Gasser, Robert Melvin

ATTACHMENT A: 90-Day Storage Area Emergency Hazardous Waste Spill Response Flowchart



Rev. 04/06/2010



FACILITY EMERGENCY COORDINATORS/TECHNICAL CONTACTS  
 FOR THE DENVER FEDERAL CENTER:

Primary Emergency Responder

Phone: 911 or pull fire Alarm At the Denver Federal Center: West Metro Fire  
 They will contact WMD/HazMat Coordinator and dispatch West Metro Fire

Primary Emergency Coordinator

Name: Allan Antonio,  
 Title: GSA Incident Commander  
 Phone: 303-236-8000 x 2366 (emergency)

When on Site Site Emergency Coordinator

At the Denver Federal Center: West Metro Fire  
 Phone: 911

PHONE NUMBERS OF EMERGENCY RESPONSE AND REPORTING AGENCIES:

<u>Name</u>	<u>Phone</u>
West Metro Fire Protection District call JeffCo HazMat Team if required. (Emergency Response)	911 With WM/HazMat Coordinator will
Jefferson County Hazardous Materials Response Authority	911 (Emergency Response)
Jefferson County, Environmental Health Dept.	303-271-5755 or 303-232-6301 (after hours)
Colorado Department of Public Health & Environment (24-Hour Emergency Response No.)	1-877-518-5608
Colorado State Patrol (For State Roads)	303-239-1900
Jefferson County Local Emergency Planning Committee (LEPC) (contact Jefferson Co. Sheriff after 5:00 p.m.) (For off DFC Spills)	303-271-4900
Xcel Energy (Emergency Electrical Shut-off)	1-800-895-1999 Option 2
Metro Wastewater Reclamation District (For Discharge to Sanitary Sewer)	303-286-3000 Work Hours 303-286-3275 After Hours



U.S. Environmental Protection Agency - Region VIII 303-293-1788  
(National Response Center will Contact, for Info. on Handling Spill)

National Response Center (NRC) 1-800-424-8802  
(Required Contact if Spill Exceeds Reportable Quantities)

Chemtrec 1-800-424-9300  
(Chemical Information)

U.S. Environmental Protection Agency – RCRA Hotline 1-800-424-9346  
(Regulatory Information)

**Clean Up Companies**

Belfor 303-425-7526

Custom Environmental Services 303-423-9949

Companies have been contacted and have adequate capabilities to respond to emergency clean ups. West Metro Fire District will stabilize spill and clean up companies will perform clean up. Contracting Officer (CO), under emergency powers will be the only individual who is authorized to commit the Government in contracts. Based on an emergency requirement the CO can contract directly with the clean up companies with out prior pricing or competitive bids.



Emergency Information Form

EPA ID No. CO5670990105

Important information when reporting to the National Response Center (800-424-8802):

1. Date of incident: \_\_\_\_\_
2. Time of incident: \_\_\_\_\_
3. Location of incident: \_\_\_\_\_
4. Reported by: \_\_\_\_\_ Telephone: \_\_\_\_\_ Department: \_\_\_\_\_
5. Calling from: \_\_\_\_\_ Telephone: \_\_\_\_\_
6. Type of incident: Injury accident:  Non-injury accident:  Gas release:  Spill:  Fire:
7. First aid required: \_\_\_\_\_
8. Type of vehicle(s) involved: \_\_\_\_\_
9. Type of container(s) involved: \_\_\_\_\_
10. Identification of hazardous material: (Note: Call Chemtrec at 800-424-9300 for additional assistance identifying chemical.) \_\_\_\_\_  
\_\_\_\_\_
11. Shipping name: \_\_\_\_\_
12. Chemical name: \_\_\_\_\_
13. Trade or common name: \_\_\_\_\_
14. Placard/label description: \_\_\_\_\_  
Numbers on placard (if any): \_\_\_\_\_
15. Physical description: Solid:  Granule:  Powder:  Liquid:  Gas:
16. Bill of lading or hazardous waste manifest description if available: \_\_\_\_\_
17. Carrier/shipper's name if applicable: \_\_\_\_\_
18. Vehicle license and/or ID No.: \_\_\_\_\_



**90-DAY STORAGE AREA - EMERGENCY HAZARDOUS WASTE SPILL RESPONSE**  
*Region 8 Sustainability & Environmental Management System*

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19. Weather conditions: Wind:  Rain:  Snow:  \_\_\_\_\_

20. Locale affected: Storm drains:  Sewers:  \_\_\_\_\_

21. Distance to nearest occupied building: \_\_\_\_\_

22. Extent of injuries: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

23. Estimated quantity and disposition of recovered materials, if any: \_\_\_\_\_

*(This form must be maintained for a period of three years.)*



Contingency Plan Notification Form  
 EPA ID No. CO5670990105

This form should be used to document actions taken to control an accident. It should be filled out after the incident is over and submitted to the EPA Regional Administrator.

(Fill out a form for each organization contacted, i.e., EPA, Coast Guard, etc.)

1. Date reported: \_\_\_\_\_ Time reported: \_\_\_\_\_
2. Person reporting: \_\_\_\_\_
3. Organization: \_\_\_\_\_ Telephone: \_\_\_\_\_
4. Duty officer (person contacted): \_\_\_\_\_
5. National Response Center (Coast Guard) incident report No.: \_\_\_\_\_
6. Information reported: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
7. Commitments made:  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
8. Follow-up report needed? \_\_\_\_\_
9. Initials of person reporting: \_\_\_\_\_
10. Name and address of the facility:  
  
 U.S. General Services Administration  
 Denver Federal Center  
 West 6th Avenue & Kipling Street  
 Denver, CO 80225
11. Time of incident: \_\_\_\_\_



12. Type of incident: \_\_\_\_\_

13. Name and quantity of materials involved: \_\_\_\_\_

14. Extent of Injuries, if any: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

15. Description of possible hazards to human health or the environment outside of the facility due to release: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

(This form must be maintained for a period of three years.)