

8.0 SPILL RESPONSE PROCEDURES

8.1 SPILLS AND RELEASES OF HAZARDOUS AND EXTREMELY HAZARDOUS SUBSTANCES, DESIGNATED CHEMICALS AND PROCESS SOLUTIONS (40 CFR 302, 40 CFR 355, 40 CFR 110.10 and State Regulations).

8.1.1 Spills and releases are used interchangeably in this section to describe any discharge to the environment (air, surface or ground water, soil) in a manner that is not expressly authorized by a permit, regulation or similar approval.

8.1.2 Any spill may be of environmental concern; spills of petroleum products to surface waters, and of "hazardous substances" (as defined at 40 CFR 302) and "extremely hazardous substances" (as defined at 40 CFR 355), including materials containing these substances, present additional regulatory and reporting concerns when spilled in greater than certain quantities called "Reportable Quantities" or "RQs". A list of substances and quantities in use at [REDACTED] and subject to these requirements is found at the end of this section.

8.1.3 In the event of a spill, [REDACTED] is responsible for the following actions:

8.1.3.1 Immediately respond as needed to control the source of the spill, prevent continuing releases and initiate neutralization and/or clean-up;

8.1.3.2 Document the nature of the spill and evaluate its potential environmental and regulatory impacts. This may include but is not limited to sampling, photographing, and a written description of the clean-up methods and personnel contracted;

8.1.3.3 Consult with corporate environmental and legal personnel in determining the necessary and appropriate reporting and long-term response actions; and

8.1.3.4 Reporting, as determined to be necessary and appropriate.

8.2 GENERAL SPILL RESPONSE PROCEDURES AND INTERNAL NOTIFICATION PROCEDURES

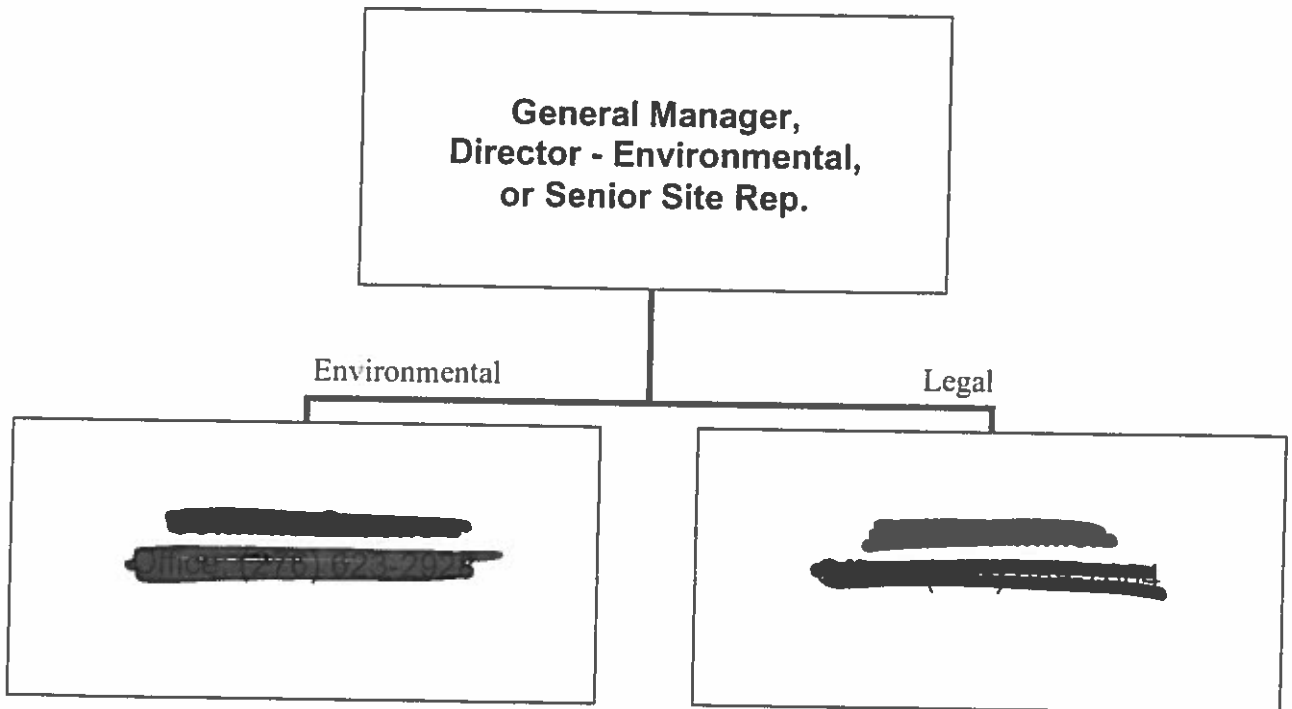
8.2.1 The following procedures describe the general actions to be taken in the event of any spill of chemicals, reagents, process solutions or other petro-chemicals that may be hazardous substances, extremely hazardous substances, or otherwise may be harmful to human health or the environment.

- 8.2.1.1 Determine the type of materials spilled and follow the recommended safety measures contained in the appropriate Material Safety Data Sheet (MSDS).
 - 8.2.1.1.1 **Note on spills of chlorine gas:** Do not attempt to stop the leak unless you have been properly trained and can do so without risk.
- 8.2.1.2 If the spill can be **safely** controlled and contained, take appropriate actions to control and contain the release.
- 8.2.1.3 After safely containing and controlling the spill, notify the area supervisor immediately.
- 8.2.1.4 The area supervisor shall take immediate action to direct operations and maintenance activities to safely contain, control and neutralize and/or clean-up the spill.
- 8.2.1.5 Clean and decontaminate the area. Properly dispose of all spill material, contaminated equipment and clothing.
- 8.2.1.6 Document the substance spilled, amount, date, time and location and cleanup of method. If necessary, interview witnesses. This should be done in cooperation with the Environmental Department.
- 8.2.2 As soon as practicable, the area supervisor shall notify the Department Manager and the Environmental Engineer of the spill.
- 8.2.3 The area supervisor shall complete the Spill/Release Report Form with all applicable information. A copy of this form is included with the Inspection Forms in Appendix B of this manual.
- 8.2.4 Specific response procedures for spills of hazardous materials, petroleum products, or other substances are found in the Spill Prevention, Control, and Countermeasure (SPCC) Plan, the Preparedness, Prevention, and Contingency Plan (PPC) and the chlorine off-site response plan. Contacts for outside services for emergency response, fire and medical assistance and site clean-up are also found in the PPC Plan.

8.3 CORPORATE AND AGENCY NOTIFICATION PROCEDURES

8.3.1 The General Manager, Director - Environmental, or Senior Site Representative shall notify both the [REDACTED]'s corporate Environmental and Legal Departments of a reportable spill as soon as sufficient information is available regarding the nature of the spill, according to the following. If the first individual cannot be reached, continue down the tree until corporate environmental and legal personnel have been advised of the spill. Spills that are clearly not reportable may not require consultation with the corporate Environmental and Legal Departments.

However, a copy of the spill report and documentation regarding non-reportable spills shall be provided to both departments.



Please note that the legal obligation to report a "reportable" spill rests with the site; and the site needs to make a report even if it cannot reach any of the above for consultation.

8.3.2 As soon as it is completed, a copy of the Spill Reporting Form shall be sent via telecopy to the corporate Environmental and Legal personnel advised of the spill. Corporate personnel shall consult with the General Manager and/or Director - Environmental as to the appropriate and necessary regulatory reporting responsibilities as well as any clean-up activities in addition to the immediate response already taken at the site.

8.3.3 The following general guidance discusses the reporting requirements applicable to [REDACTED]. A spill must be reported as soon as it is determined to meet any of the requirements discussed below, and in no case more than 24 hours after the (reportable) spill occurs. The Corporate Environmental and Legal Departments shall consult prior to reporting a spill to a regulatory agency.

8.3.3.1 A release is reportable under CERCLA (Superfund) if it meets or exceeds the RQ within a 24-hour period and has entered the environment by contamination of air, soils, surface or ground water, but remains within the site property boundary. Reports of these spills go to the National Response Center (NRC). (40 CFR 302)

8.3.3.2 A release is reportable under SARA (Community Right-To-Know) only if it meets or exceeds the RQ within a 24-hour period and has migrated off-site (outside property boundaries). Reports of these spills go to the NRC, the County Local Emergency Planning Committee, the State Emergency Planning Commission.

8.3.3.3 A release of any quantity of chemical or petroleum product to surface waters (including dry washes that are considered "navigable waters") or to ground water is reportable to the EPA and the PA DEP.

8.3.3.4 A release of petroleum products must be reported to the NRC under the CWA if it causes a sheen on surface waters, regardless of the period of time over which the release occurred. (40 CFR 110.10)

8.3.3.5 Reporting requirements may not be mutually exclusive. A large spill, which has entered a waterway, may be reportable to all listed agencies, depending on the substance spilled. In general, if a spill is serious enough to call the National Response Center, state and local agencies should also be notified.

8.3.4 The following information is required for notifications to the NRC for releases of hazardous or extremely hazardous substances:

1. Company name and location including the specific location of the discharge and the receiving media;
2. the chemical name, type and amount of substance discharged, and whether it is listed as an extremely hazardous substance at 40 CFR 355;
3. the name, address and telephone number of the Environmental Engineer, or the name of the person to contact on behalf of the company who will be at the scene and will be directing response measures.
4. a description of any response actions taken;
5. the names of any other agencies notified or to be notified;

6. the suspected cause of the discharge;
7. the date, time and duration of the discharge, to the extent known;
8. the immediate known impacts of the discharge;
9. any known or anticipated acute or chronic health risks associated with the discharge, and, if appropriate, advice regarding medical attention necessary for exposed individuals; and
10. any precautions to be taken as a result of the discharge (i.e., evacuation).

8.3.6 Telephone numbers for spill reporting are as follows:

1. **National Response Center (NRC):**
(800) 424-8802 or
(412) 644-5808 (Pittsburgh Office)
2. **EPA - Region III**
(215) 597-9800

A written report including the above-listed information, and other information that may be required by the applicable regulations regarding the spilled material, will need to be transmitted within 7 days to the following agencies:

U.S. Environmental Protection Agency
Region III
Spill Response Section
841 Chestnut Building
Philadelphia, PA 19107

Pennsylvania Department of Environmental Resources
Bureau of Water Quality Management
400 Waterfront Drive
Pittsburgh, PA 15222

ENVIRONMENTAL MANAGEMENT AND PROCEDURES MANUAL

REPORTABLE QUANTITIES OF HAZARDOUS AND EXTREMELY HAZARDOUS MATERIALS AT EMERALD MINE

Hazardous Material	Quantity/Report To				
	NRC	LEPC, SEMC (HazMat and Emergency Resp)	EPA (Water Quality)		
Chlorine	10#	10#			
Characteristic Hazardous Wastes					
Ignitable (flash point <140EF)	100#				
Corrosive (2 > pH > 12.5)	100#				
Trichloroethane (including F-listed spent solvents with >10% TCA)	100#				
TCLP					