

ATT-770-500-001 California Hazardous Material Spill/Release Emergency Response and Reporting Procedure

Abstract

The purpose of this procedure is to ensure the proper response/reporting associated with spills/releases of hazardous materials resulting from AT&T operations or the operations of AT&T affiliates in California. This procedure covers any spill/release of a hazardous material in California resulting from AT&T operations or the operations of AT&T affiliates.

Audience: California, All AT&T Operations in California

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Related Documents: (None listed)

Cancel Documents: (None)
Business Unit: Network
Points of Contact:

James Cranmer Contact List.

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PROPRIETARY INFORMATION

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Introduction

A. PURPOSE/SCOPE The purpose of this procedure is to ensure the proper response/reporting associated with spills/releases of hazardous materials resulting from AT&T operations or the operations of AT&T affiliates in California. This procedure covers any spill/release of a hazardous material in California resulting from AT&T operations or the operations of AT&T affiliates.

B. WHO IMPLEMENTS PROCESS

- Environmental Manager or Subject Matter Expert (SME) drafting new or updated existing environmental procedure; periodic review of procedures to ensure they meet regulatory requirements; completes the procedure once notified of a spill/release of hazardous material associated with AT&T operations.
- Environmental Area Manager review written and revised procedures.
- Environmental Director approval of procedure; ensures non-Environmental Management Directors area aware of the requirement to implement the procedure.
- Non-Environmental Management Directors-ensures that Area Managers are aware of the requirement to implement the procedure and that training is being conducted in accordance with the procedure.
- Area Managers ensure their direct reports are aware of the details of the procedure and complete training in accordance with the procedure.
- First Line Managers understand the details of the procedure and train their personnel on the procedure.
- Technicians follow/implement the procedure and attend annual training.

C. WHEN PROCESS IS IMPLEMENTED This procedure is implemented immediately upon discovery of a spill/release of hazardous materials. This procedure is to be followed whether inside or outside and whether the spill is on or off AT&T property. All spills of hazardous materials must be reported to AT&T Environmental Management immediately. The specific requirements of the procedure will depend on the nature of the spill.

D. APPLICABLE REGULATIONS AND STANDARDS

D.1 Federal Regulations

- 40 Code of Federal Regulations Title III (CFR) Part 302 (SARA)
- 40 Code of Federal Regulations Part 265 (RCRA)
- 40 Code of Federal Regulations Part 112 (CWA SPCC)
- 49 Code of Federal Regulations Parts 100-177 and 263

D.2 State and Local Regulations

- Office of Emergency Services (OES) Publication California Hazardous Material Spill/Release Notification Guidance (January 1999).
- Health and Safety Code 25507, 25503, 25270.7 and 25270.8
- California Vehicle Code 23112.5
- Public Utilities Code 7673
- Water Code 13271, 13272
- California Labor Code 9603, 11004

1. Reason For Current Issue

This is the current procedure for response/reporting of spills/releases of hazardous materials resulting from AT&T operations or the operations of AT&T affiliates in California.

2. Procedure

- E.1 If a spill/release represents an actual or potential threat to human health or the environment or represents a significant release of hazardous materials; immediately (otherwise start this procedure with the second bullet comment under E.1.1 below):
- E.1.1 The employee discovering the spill/release shall immediately:
 - Call 911 (if there is any question about the need for 911 Call)
 - Evacuate the area, restrict access, immediately call AT&T Environmental Management (1-866-492-6836), and notify your supervisor.
 - Provide the following information to AT&T Environmental Management:
 - 1. Name and phone numbers of the person making the call
 - 2. Location (address, city and county) and source of the spill/release
 - 3. Chemical name or identity of the substance involved
 - 4. Estimate of the quantity discharged into the environment
 - 5. Time of the discharge
 - 6. The media into which the substance was discharged (soil, water, pavement) being sure to include any sewers drains or sumps that are affected.
 - 7. Initial response actions taken.
- E.1.2 If it is deemed by on-site personnel to be within their capability to do so and it is safe, site personnel should attempt to contain the spill/release to prevent, if at all possible, the migration of the released material (including to a waterway, sewer system or soil).
- E.1.3 If the situation requires, Site Management or Environmental Management will immediately engage an Environmental Management-approved emergency response/clean-up vendor to contain and clean-up the spill. In the event that a spill is cleaned up by others (such as a 9-1-1 responder), an Environmental Management-approved hazardous waste vendor may still be required to pick-up, transport, and dispose of any hazardous waste resulting from the spill and associated clean-up
- E.1.4 For any spill requiring reporting under E.1.5, E.1.6 or E.1.7 below and for all spills off of AT&T property; AT&T Environmental Management will immediately call the Certified Unified Program Agency (CUPA) (see CUPA list in the Hazardous Materials Spill Reporting Binder under Backup Materials under the California Tab). Upon calling the CUPA Environmental Management will:
 - Record the name of the person contacted at the CUPA, the date, and the time of the notification

- Record any case or incident number.
- Ask the CUPA representative if any other agencies require notification, and if possible obtain contact phone numbers for them.
- Ask the CUPA what if any, written notifications must be completed for them or other responsible agencies.

E. 1.5 If a spill/release meets any of the following criteria, then Environmental Management will immediately notify by phone the California Governors Office of Emergency Services (OES) (916-845-8911 if calling from outside California) (800-852-7550 if calling inside California):

- If there is a reasonable belief that the release poses a significant or potential threat to human health or the environment.
- When there is a significant or threatened release of hazardous materials (Note the California Office of Emergency Services intends for this to be a self regulating standard and has not defined significant release. AT&T believes a significant release would include but not be limited to releases that could impact human health or the environment, releases to a waterway or sewer, releases involving a Federal RQ and releases to soil which could facilitate migration to groundwater etc. If there is any doubt report immediately!).
- The spill of any hazardous substance, sewage or petroleum product to any water, waterway or sewer.
- Any spill/release of 25 gallons or more of petroleum product (AT Policy).
- Any spill requiring notification to the National Response Center (NRC) (see E1.7 below) will first be reported to the OES.

- E. 1.6 If the release is a reportable quantity as listed in the USEPA List of Lists, if a release, fire, or explosion threatens human health or the environment outside of the facility, or if an oil spill will reach a navigable body of water then Environmental Management must immediately notify the National Response Center (NRC) at 800-424-8802.
- E. 1.7 If the release poses an unreasonable risk to health, safety or property on a street or highway Environmental Management must immediately notify the local office of the California Highway Patrol or agency having traffic jurisdiction for that highway (use directory assistance unless otherwise notified by OES per their guidance.
- E. 1.8 If the release is into a waterway, in addition to the OES and NRC Environmental Management must immediately notify as appropriate the following (unless otherwise advised by OES):
 - U.S. Coast Guard
 - i. Marine Safety Office San Francisco (Alameda) 415-399-3547, or
 - ii. Marine Safety Office/Long Beach 310-732-2043, or
 - iii. Marine Safety Office/San Diego 619-683-6470
 - California Department of Fish & Game, Office of Spill Prevention and Response (DFG) (1-888-334-2258)
 - Regional Water Quality Control Boards (RWQCBs). There are nine boards. Use the included link to find the appropriate board (http://www.waterboards.ca.gov/) (The California Office of Emergency Services (OES) provides help with the determination as to which agencies require notification, however, AT&T is ultimately responsible for the required reporting).
- E. 1.9 AT&T Environmental Management will notify AT&T Safety if the release results or may result in injury or workers are harmfully exposed at 866-722-7233.
- E.2 Site personnel MUST complete the Incident Reporting form and return the form to Environmental Management by noon of the first business day following the incident. Return by Fax (214) 464-1424.
- E.3 Environmental Management will complete the Incident Report Form (attached in Section 4 below) and enter the incident in the Incident database not later than noon of the first business day following the incident in accordance with procedure ATT-EM-IR-300.

E.4 Environmental Management will conduct a root cause analysis to determine whether procedural changes are needed to prevent similar releases in the future.

F. REQUIRED TRAINING California managers will complete AT&T Spill/Release Response/Reporting training annually and will ensure that all subordinates are training in Spill/Release Response/reporting annually. Any employee new to their position must receive training within 60 days of entry into his/her position. The training is available through the Learning Management Center at (http://lmc.sbc.com, Click Continue, Click Regional Training, Click Hazardous Spill & Reporting). Training documentation is housed electronically in the Training Information Warehouse.

G. DOCUMENTATION AND RECORDKEEPING AT&T Environmental Management will record the incident into the AT&T Internal Incident Reporting Database in accordance with the Incident Reporting Procedure Recordkeeping and Reports ATT-EM-IR-300.

3. Related Environmental Management Processes

Environmental Management Administrative EM Emergency Hotline (800#) ATT-EM-ADM-200

Incident Reporting Recordkeeping and Reports ATT-EM-IR-300

Waste Disposition Management Off Site Shipping and Manifesting ATT-EM-WDM-300

4. Related Documents

Click the associated link for the respective document

INCIDENT REPORT FORM.doc

Note: You must have the proper application in order to open the file.

California spill Response.doc

Note: You must have the proper application in order to open the file.

5. Acknowledgements

6. Contact List

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7. Revision Log

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Acronyms

A.1. Document Specific Acronyms

None.

APEx - Advanced Publishing Express

A.2. Network Acronyms Dictionary

Refer to ATT-000-000-020, Network Acronyms Dictionary.