

**SPILL PREVENTION AND RESPONSE PLAN CHECK LIST
FOR BUSINESSES IN DAYTON'S SOURCE WATER PROTECTION AREA**

NOTE: This document is not to be considered a Spill Prevention and Response Plan. This is a checklist intended to ensure that all the items below are addressed in the Spill Prevention and Response Plan developed by the business in the Source Water Protection Area. Once the Spill Prevention and Response Plan has been developed and implemented, the plan and supporting documents shall be made available to the Departments of Water and Fire during Source Water Protection Program and Fire inspections. The requirements are as follows:

SPILL PREVENTION

Regulated Substance Management: All Regulated Substances, including chemical wastes, are to be managed in a way that prevents release, and is consistent with protocol established by Federal, State and Local regulatory agencies.

- For each “Yes” response, the owner and/or operator shall describe how each requirement is currently addressed.
- For each “No” response the owner and/or operator shall describe how each requirement is proposed to be addressed.
- For each “Not Applicable” response, the owner and/or operator shall provide justification why this requirement is not applicable to the site (example – this requirement is not applicable to our site because we do not handle flammable materials).

Storage:

1. All Regulated Substance containers are in good condition, compatible with the materials stored within, and residual spills on the exterior of the containers are cleaned immediately.	Yes ___ No ___ Not Applicable ___ _____ _____
2. All Regulated Substance containers are accessible and spacing between containers provides sufficient access to perform periodic inspections and respond to releases.	Yes ___ No ___ Not Applicable ___ _____ _____
3. All Regulated Substances are stored inside buildings or if outside; under a cover, on an impermeable surface, with secondary containment.	Yes ___ No ___ Not Applicable ___ _____ _____
4. Regulated Substances not used on a daily basis are stored in cabinets, or in designated areas.	Yes ___ No ___ Not Applicable ___ _____ _____
5. All waste drums allow at least 4 inches of headspace to allow for expansion.	Yes ___ No ___ Not Applicable ___ _____ _____
6. Regulated Substances are stored in proper cabinets and only with compatible materials. (i.e. flammability cabinets)	Yes ___ No ___ Not Applicable ___ _____ _____
7. Incompatible substances are stored a safe distance apart or in a manner which precludes mixing to prevent potential explosion or fire.	Yes ___ No ___ Not Applicable ___ _____ _____

Housekeeping:

8. All spills or leaks which are small and easily contained are immediately cleaned up and properly disposed.	Yes ___ No ___ Not Applicable ___ _____ _____
9. Signage is used to identify hazardous substance and nonhazardous substance storage or waste collection areas.	Yes ___ No ___ Not Applicable ___ _____ _____
10. A log documenting that Equipment and Regulated Substance storage areas are inspected monthly to ensure leaks or spills are not occurring or have not occurred is maintained. *	Yes ___ No ___ Not Applicable ___ _____ _____
11. Work areas and Regulated Substance storage areas are kept clean and in good general condition.	Yes ___ No ___ Not Applicable ___ _____ _____
12. Flammable materials in drums or totes are grounded during material transfer to prevent static spark.	Yes ___ No ___ Not Applicable ___ _____ _____

Handling:

13. All Regulated Substances, including chemical wastes, are properly marked and labeled in accordance with all federal, state and local regulations.	Yes ___ No ___ Not Applicable ___ _____ _____
14. Regulated Substances transferred to secondary containers are marked with the chemical's name.	Yes ___ No ___ Not Applicable ___ _____ _____
15. All Regulated Substances that are transferred from larger to smaller containers are transferred by use of a funnel or spigot.	Yes ___ No ___ Not Applicable ___ _____ _____
16. All Regulated Substance containers are closed when not in use.	Yes ___ No ___ Not Applicable ___ _____ _____
17. Drip pans or other collection devices are used to contain drips or leaks from dispensing containers or equipment.	Yes ___ No ___ Not Applicable ___ _____ _____
18. A Disposal Practices log documenting substances, dates removed, quantities removed, and vendors is maintained. *	Yes ___ No ___ Not Applicable ___ _____ _____

Spill Response Supplies:

19. Spill clean-up supplies are compatible with the Regulated Substances stored on site.	Yes ___ No ___ Not Applicable ___ _____ _____
20. Spill supplies are stored in areas where spills are likely to occur (loading docks, chemical storage areas, locations where Regulated Substances are being transferred).	Yes ___ No ___ Not Applicable ___ _____ _____
21. Spill kits are sufficient to contain the amount of Regulated Substances that may be spilled or released.	Yes ___ No ___ Not Applicable ___ _____ _____
22. A log documenting spill supplies are inspected monthly to ensure they are complete is maintained. *	Yes ___ No ___ Not Applicable ___ _____ _____

Secondary Containment:

23. All Regulated Substances in containers 55 gallons or greater, or any sized containers if there is a potential for a release to the environment, are stored in appropriate secondary containment.	Yes ___ No ___ Not Applicable ___ _____ _____
24. A log documenting the removal of any storm water contained in any outside secondary containment system is maintained.* (See attachment # _____ for details)	Yes ___ No ___ Not Applicable ___ _____ _____
25. A log documenting that secondary containment is checked monthly is maintained. (See attachment # 2 for details)	Yes ___ No ___ Not Applicable ___ _____ _____

Engineering Controls:

26. An operations and maintenance log documenting that all engineering controls have been inspected and are in good operating condition shall be updated on a monthly basis. *	Yes ___ No ___ Not Applicable ___ _____ _____
27. An inventory of all machines including oil and/or coolant reservoir capacities shall be updated when any changes in inventory are made.	Yes ___ No ___ Not Applicable ___ _____ _____
28. Preventative maintenance activities to reduce the potential for release from equipment have been implemented.	Yes ___ No ___ Not Applicable ___ _____ _____

Employee Training:

29. A log documenting employee training on the proper handling of Regulated Substances is maintained. *	Yes ___ No ___ Not Applicable ___ _____ _____
30. All employees receive periodic training on the location and use of the spill response supplies and procedures.	Yes ___ No ___ Not Applicable ___ _____ _____
31. All employees receive periodic review of the spill prevention and response plan.	Yes ___ No ___ Not Applicable ___ _____ _____
32. All employees receive hazard communication training, including the location of safety data sheets.	Yes ___ No ___ Not Applicable ___ _____ _____

SPILL RESPONSE

Spill Response Procedures are facility specific for dealing with spills and shall be implemented immediately whenever there is a release of a Regulated Substance which escapes containment and are consistent with protocol established by Federal, State and Local regulatory agencies. These procedures shall be reviewed and immediately amended whenever:

1. The procedures fail in a spill event
 2. The facility changes in its design, construction, equipment, operation, maintenance, use, or other
 3. The list of emergency contacts change
- For each “Yes” response, the owner and/or operator shall describe how each requirement is currently addressed.
 - For each “No” response the owner and/or operator shall describe how each requirement is proposed to be addressed.
 - For each “Not Applicable” response, the owner and/or operator shall provide justification why this requirement is not applicable to the site (example – this requirement is not applicable to our site because we do not handle flammable materials).

Employee Training: See Employee Training above under Spill Prevention.

33. Spill Response Procedures, incorporating all appropriate training, notification, response, and cleanup/disposal measures, have been generated and are available for review by all employees.	Yes ___ No ___ Not Applicable ___ _____ _____
34. All employees receive periodic training on the location and use of the spill response supplies and procedures. (See #30 from above)	Yes ___ No ___ Not Applicable ___ _____ _____
35. All employees receive periodic review of the spill prevention and response plan. (See #31 from above)	Yes ___ No ___ Not Applicable ___ _____ _____

36. All employees receive hazard communication training, including the location of safety data sheets. (See #32 from above)	Yes ___ No ___ Not Applicable ___ _____ _____
37. A log documenting employee training on Spill Response Procedures is maintained. *	Yes ___ No ___ Not Applicable ___ _____ _____

Reporting a Release:

38. All appropriate notifications are posted and available for review by all employees.	Yes ___ No ___ Not Applicable ___ _____ _____
39. All appropriate notifications are updated whenever a change has occurred and employees are notified of changes.	Yes ___ No ___ Not Applicable ___ _____ _____
40. Employees know what information is needed and are prepared to provide the information when reporting a release.	Yes ___ No ___ Not Applicable ___ _____ _____

Spill Response Actions:

41. If the spill is small and its chemical properties are known, proper supplies are available to stop and contain it. (See #21 from above)	Yes ___ No ___ Not Applicable ___ _____ _____
42. If the spill is small and its chemical properties are known, adsorbent, booms, drain covers, etc. are available to protect drains. (See #8 from above)	Yes ___ No ___ Not Applicable ___ _____ _____
43. If spill cannot be contained/controlled, employees have been trained in proper procedures for evacuation and reporting the spill.	Yes ___ No ___ Not Applicable ___ _____ _____

Spill Disposal:

44. Procedures are in place to characterize the waste and determine the wastes status prior in order to dispose properly	Yes ___ No ___ Not Applicable ___ _____ _____
45. Someone is designated to prepare a report of the incident to be submitted to the Department of Water within 30 days of the incident.	Yes ___ No ___ Not Applicable ___ _____ _____
46. A log is maintained noting who has replaced/restocked the materials/supplies used. *	Yes ___ No ___ Not Applicable ___ _____ _____

Briefly describe any other site-specific practices which reduce risk to the groundwater (SWPP - our drinking water source) or to the storm system (MS4 - goes to our rivers untreated). Attach additional sheets if necessary.

***All logs for the above activities/practices/procedures will be made available for review by City of Dayton staff during SWPP inspections by the Department of Water, Division of Environmental Management and the Fire Department.**

In the event of a regulated substance spill or release, immediately take the following measures to keep the spill from entering sewer or storm drains, spreading off-site, or affecting human health. In all cases caution and common sense must be maintained with the primary goal being to prevent and/or limit personal injury.

Stop, contain, and clean up the chemical spill if:

1. The spilled chemical and its hazardous properties have been identified
2. The spill is small and easily contained

If a spill or release cannot be controlled (i.e. escapes containment) or injuries have occurred due to the release the following procedures should be implemented:

1. Summon help or alert others of the release
2. Evacuate immediate area, and provide care to the injured- Call 911
3. If potential fire or explosion hazards exist, initiate evacuation procedures- Call 911.
4. Respond defensively to any uncontrolled spills
 - i. Use appropriate personal protective equipment when responding to any spill
 - ii. Attempt to shut off the source of the release (if safe to do so)
 - iii. Eliminate sources of ignition (if safe to do so)
5. Protect drains by use of adsorbent, booms or drain covers (if safe to do so)
6. Notify onsite emergency contact(s)
7. Notify other trained staff and/or emergency response contractor to assist with the spill response and cleanup activities
8. Coordinate response activities with local emergency personnel (fire department).
9. Be prepared to provide Safety Data Sheets (SDS) (also referred to as MSDS/GHS) information to Ohio EPA, Departments of Water and Fire, EMTs hospital or physician
10. Notify appropriate agency if a release has entered the environment

Reporting a Release: If a Regulated Substance spill, of any quantity, has escaped containment and has been released to soil, surface water, storm water drains, or dry well drains, the following notifications are to be performed immediately:

- **Fire Department (911)**
- **Dayton Division of Environmental Management** (if between 8:00 am to 5:00 pm) at (937) 333-3725 (Dayton's portion of the Source Water Protection Area.)
- **Dayton Division of Water Supply & Treatment** (if after hours) at (937) 333-6030
- Ohio EPA Emergency Hotline at 1-800 282-9378
- National Response Center (within 24-hours if a release of oil or fuel to surface water, or a release of a chemical with an established Reportable Quantity-RQ)

When reporting a release, prepare to provide the following information:

- Your name and telephone number from where you are calling

- Exact address of the release or threatened release
- Date, time, cause and type of incident (fire, air release, spill, etc.)
- Material and quantity of the release, to the extent known
- Current condition of the facility
- Possible hazards to the public health and/or environment outside of the facility

Spill Cleanup and Disposal: In the event of a hazardous substance release spill cleanup materials are to be properly characterized to determine if it designates as a Dangerous Waste. The designated onsite emergency contact, with the assistance of waste disposal vendor and other resources will determine the wastes status prior to disposal.

A detailed report of the incident including content and amount of release, impacts to the environment, how the release was mitigated and offsite disposal shall be submitted to the Department of Water within 30 days of the incident.

Spill Prevention and Response Plan Required Contents

Site Diagram: Detailed site diagrams have been generated and are available for review by all employees. (See Attachments 3 and 4 Site Diagram Templates.) Yes ___ No ___ Not Applicable ___.

The Site Diagrams shall be reviewed annually and amended whenever changes are made.

The site diagrams shall include both inside and outside details including, but not limited to the following:

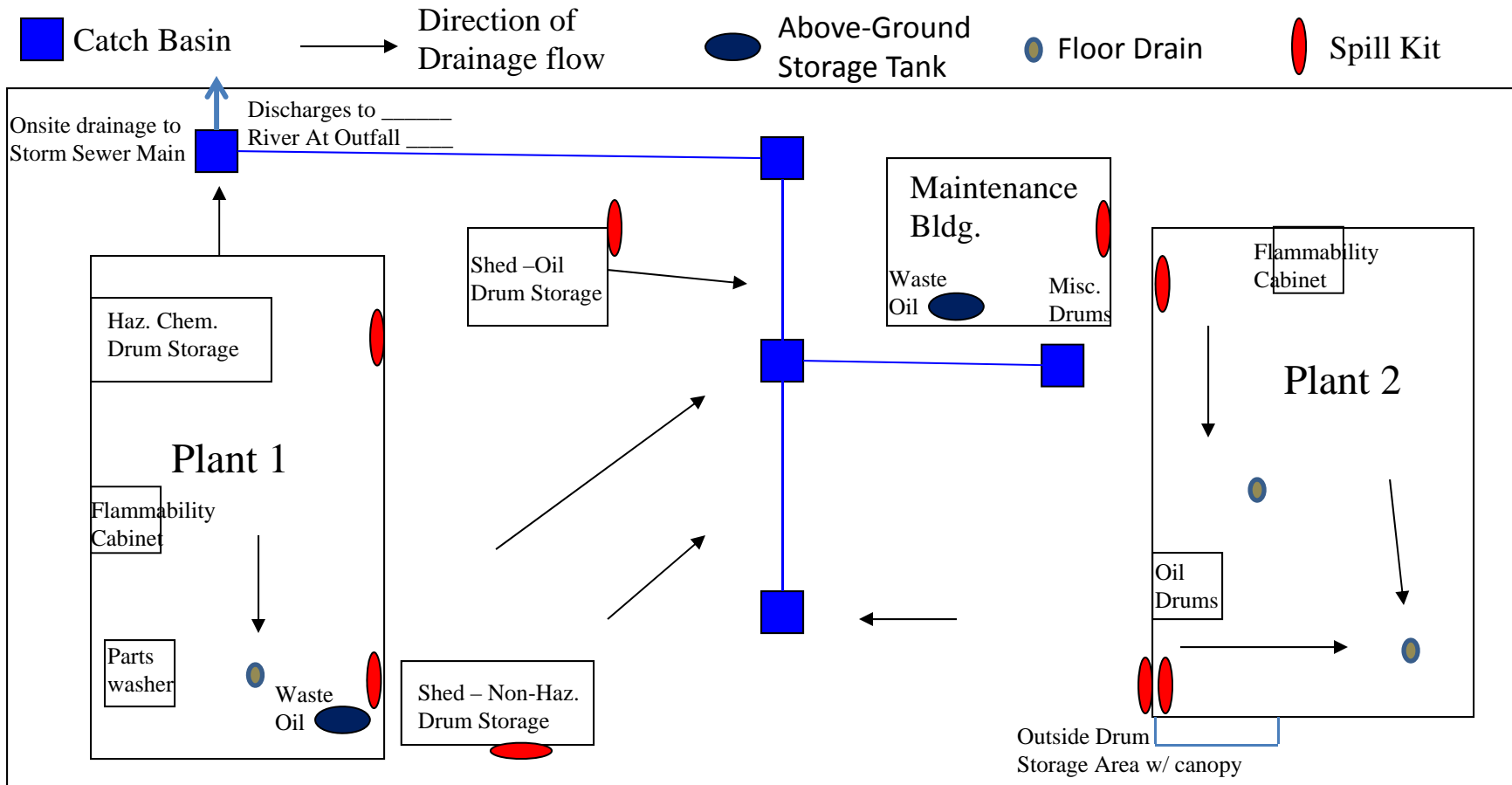
- Outside storage of Regulated Substances including structure providing cover
- Bulk storage areas (ASTs and USTs). Note: new USTs are prohibited
- Processes which store, consume and/or discharge Regulated Substances including equipment reservoirs containing oils, coolants and/or solvents
- Hazardous, non-hazardous and waste oil storage areas
- Self-contained storage including parts washers, and machines that use Regulated Substances
- Safety Data Sheets stations (Globally Harmonized Systems)
- Emergency contact numbers
- Engineering controls (secondary containment, spill containment pallets, oil/water separators, spill control carts, etc.)
- Flammability cabinets
- Spill kit storage areas
- Delivery and disposal routes of Regulated Substance products/waste.
- Locations of all storm catch basins, and/or dry well drains, and/or French drains
- The direction of onsite drainage flow and the end-of-pipe discharge location (example: discharges to the Great Miami River at Outfall Designation GML70 or discharges to the groundwater via direct infiltration through the dry well or French drain)
- Inside floor drains: Confirm they drain to sanitary.

All requirements are consistent with protocol established by Federal, State and Local regulatory agencies. Questions regarding this document should be directed to the City of Dayton, Department of Water, Division of Environmental Management at (937) 333-3725.

Attachment 3 – Chemical Storage & Drainage Example

Facility Name: _____

Facility Address: _____

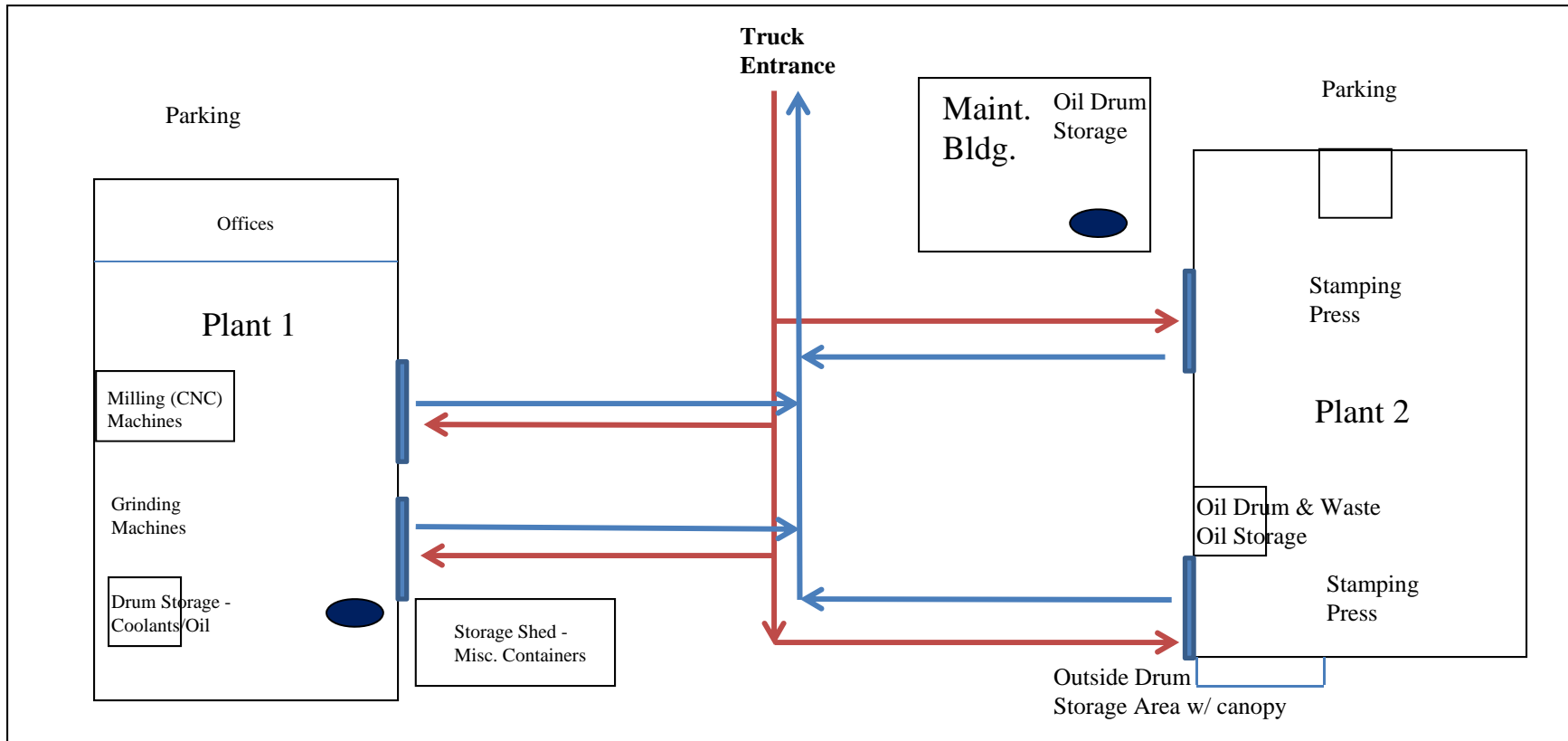


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Attachment 4 – Regulated Substance Flow – Deliveries & Disposal Routes - Example

Facility Name: _____

Facility Address: _____



Waste Oil Collection or Recycling Companies: _____

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