



NEMS ENVIRONMENTAL MANAGEMENT PROGRAM

PROGRAM NAME:	Chemical Spills and Leaks Containment Program		
SIGNIFICANT ENVIRONMENTAL ASPECT(S): Chemical Spills and Leaks to Ground or Water	DOCUMENT NUMBER:	EMS.EMP.07.2007.BALT	
	DATE REVISED:		
	REVISION NUMBER:		
	SUNSET DATE:		
	PROGRAM LEAD:	Jane Clarke, Scott Koehler	

SECTION 1 – PROGRAM DESCRIPTION

EPCRA requires NIH to prepare emergency planning provisions for extremely hazardous substances (EHSs) stored on-site, and the Toxic Release Inventory (TRI) requires reporting for toxic chemicals manufactured, processed, or otherwise used on-site. Additionally, NIH must inventory their chemicals and provide material safety data sheet submission of EHSs and OSHA hazardous chemicals.

Fuel storage tanks, which also have the potential to spill or leak, is regulated under the oil pollution prevention rules codified at 40 CFR Part 112, the Underground Storage Tank (UST) regulations in 40 CFR Part 280, and State of Maryland implementing regulations. RCRA Subtitle I contains the statutory provisions for the management of USTs.

The Chemical Spills and Leaks Containment Program is designed to help NIH Baltimore maintain, transfer and dispose of chemicals in a safe and efficient manner. Additionally, it provides guidance to NIH Baltimore on dealing with spills and leaks consistent with environmental regulations and the protection of human health. This program will help NIH Baltimore develop appropriate protocols for managing chemicals and associated spills/ leaks from daily operations and/ or FST maintenance.

SECTION 2 – GOALS AND OBJECTIVES

GOAL:	Performance Indicator(s):		Resource requirements:
<i>Justification:</i>			
1. Objective: Investigate development of a more secure protocol for chemical transfers between NIH facilities (NIA only)	Performance Indicator(s):	Responsibility: Jane Clarke	Timeframe:
- <i>Target/Milestone:</i>	Performance Indicator(s):	Responsibility:	Timeframe:

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<i>- Target/Milestone:</i>	Performance Indicator(s):	Responsibility:	Timeframe:
2. Objective: Work with Hopkins and building owners to establish clear determination of UST ownership and liabilities	Performance Indicator(s):	Responsibility: Scott Koehler	Timeframe:
<i>- Target/Milestone:</i>	Performance Indicator(s):	Responsibility:	Timeframe:
<i>- Target/Milestone:</i>	Performance Indicator(s):	Responsibility:	Timeframe:
3. Objective: Establish SPCC plan, if needed	Performance Indicator(s):	Responsibility: Greg Gnipp	Timeframe:
<i>- Target/Milestone:</i>	Performance Indicator(s):	Responsibility:	Timeframe:

SECTION 3 – PROGRAM DESCRIPTION, SIGNIFICANCE, IMPACTS AND REQUIREMENTS

REASON(S) FOR SIGNIFICANCE:	<ul style="list-style-type: none"> ▪ Aspect is subject to a variety of federal, state and local requirements ▪ Aspect has potential to cause negative environmental and public health affects ▪ Potential for high fines/ costs
POTENTIAL ENVIRONMENTAL/ ORGANIZATIONAL IMPACTS:	<ul style="list-style-type: none"> ▪ Ground and surface water contamination ▪ Ground and surface water contamination ▪ Soil contamination ▪ Ecological Damage ▪ Negative public image/community relations ▪ Negative financial impacts
LEGAL AND OTHER REQUIREMENTS:	<ul style="list-style-type: none"> ▪ Resource Conservation and Recovery Act (RCRA) ▪ EPCRA ▪ CWA ▪ COMAR 26, Subtitles 4, 10, 13, 26 ▪ MDE and City of Baltimore ▪ 40 CFR 112 ▪ 40 CFR 280 (for USTs) ▪ 40 CFR Part 370

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- 40 CFR 372
- Executive Order 13423: Strengthening Federal Environmental, Energy and Transportation Management
- NIH Manual Issuance 1340, NIH Occupational Safety and Health Management
- NIH Manual Issuance 3032, Waste Minimization and Management at NIH
- EPA Priority Chemicals List
- NIH Waste Disposal Guide
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SECTION 4 – OPERATIONAL CONTROLS

ACTIVITY(IES) THAT GIVES RISE TO ASPECT	CONTROL(S)	RESPONSIBLE PERSON	MONITORING	RECORDS	ACTION TAKEN IF CONTROL FAILS
A/B Neutralization for wastewater	<ul style="list-style-type: none"> ▪ NIA/ NIDA safety orientation and annual refresher courses ▪ PI Compliance Statement 	▪	▪	▪	▪
Bulk Fuel Storage (USTs and ASTs)	<ul style="list-style-type: none"> ▪ SPCC Plan 	▪	▪	▪	▪
Bulk Fuel Transfer During Fill/Dispensing Operations	<ul style="list-style-type: none"> ▪ SPCC Plan 	▪	▪	▪	▪
Cage Washing	<ul style="list-style-type: none"> ▪ Terms of contract ▪ CMS SOP Book 	▪	▪	▪	▪
Chemical, Biological and Radioactive Isotope Use, Storage, Disposal and Transportation	<ul style="list-style-type: none"> ▪ NIA/ NIDA safety orientation and annual refresher courses ▪ PI Compliance Statement 	▪	▪	▪	▪
Imaging (PET scans,x-ray, MRIs)	<ul style="list-style-type: none"> ▪ 	▪	▪	▪	▪
Janitorial services	<ul style="list-style-type: none"> ▪ Terms of contract 	▪	▪	▪	▪
Mixed Waste Handling (e.g., rad waste, med waste)	<ul style="list-style-type: none"> ▪ NIA/ NIDA safety orientation and annual refresher courses ▪ PI Compliance Statement 	▪	▪	▪	▪

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SECTION 5 – RELEVANT DOCUMENT(S)		
DOCUMENT NAME	LOCATION	RESPONSIBLE PERSON
Contract with Quitlabs		
NIH Manual Issuance 1340, NIH Occupational Safety and Health Management		
NIH Manual Chapter 3034: Working with Hazardous Materials		
NIH Manual Issuance 3032, Waste Minimization and Management at NIH	http://www1.od.nih.gov/oma/manualchapters	
NIH Hazard Communication Program	http://www.nih.gov/od/ors/ds/pubs/hcp/	
NIA Chemical Hygiene Plan		
NIH Radiation Safety Guide	http://drs.ors.od.nih.gov/	
Material Safety Data Sheets	Hardcopies in laboratories and/or access to electronic MSDSs	
NIH Waste Disposal Guide	http://orf.od.nih.gov/Environmental+Protection/Waste+Disposal/	
SECTION 6 – COMPETENCY OF RESPONSIBLE PERSONS		
NAME/TITLE	BASIS FOR COMPETENCE	
Jane Clarke	Education and Training	
Scott Koehler	Senior facility manager; Mechanical engineer; 15 years experience at NIH Baltimore.	
SECTION 7 – AUTHORIZATION		
NAME:		
SIGNATURE:		
DATE:		

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