

CLASSIFICATION OF A SPILL FROM A COMMERCIAL HAZARDOUS MATERIAL SHIPMENT ON A DOE/NNSA SITE

QUESTION: According to DOE G 151.1-2, Appendix D, p. D-1: “Non-DOE (commercial) shipments of hazardous material to, from, or across the site are governed by Department of Transportation (DOT) regulations for commercial hazardous materials transport and do not require a Hazards Survey or Emergency Planning Hazards Assessment (EPA).” If protective actions are taken in accordance with the DOT Emergency Response Guidebook (ERG) for an onsite spill from a commercial shipment, must that event be classified?

ANSWER: Under DOE O 151.1C, Chapter V, paragraph 2a (2), any spill from a commercial shipment on public highways near a DOE/NNSA site would be an Operational Emergency that does not require classification:

“An offsite hazardous material event not associated with DOE/NNSA operations that is observed to have or is predicted to have an impact on a DOE/NNSA site, such that protective actions are required for onsite DOE/NNSA workers.”

This Operational Emergency (OE) definition can be extended to commercial (i.e., non-DOE) shipments arriving onsite, departing from or traversing the site and a spill would not require classification.

However, it is the intent of the Order that all accidents involving hazardous materials in transport on a DOE site be classified and protective actions implemented, as appropriate. As indicated in DOE G 151.1-2, Appendix D, *Onsite Transportation Analysis*, Section D.1:

"Planning and preparedness for transportation-related hazardous material emergencies on DOE or NNSA sites should be an integral part of the site comprehensive emergency management program. Successful integration requires that the approach to hazard identification, analysis, and the application of the results be consistent with the process used for fixed-facility EPAs."

Therefore, although no EPA is produced for DOT compliant commercial shipments, the DOT Emergency Response Guidebook (ERG) provides substitute analysis results that can be applied to the development of classification and protective action criteria to ensure a consistent and seamless integration of planning and preparedness activities for ALL onsite hazardous material release Operational Emergencies (OEs). *Successful integration* suggests that a site response for transportation accidents analyzed in the ERG (and supporting docs) should be consistent (i.e., classification and initial protective actions) with its response to emergency events that are specifically analyzed in EPAs. Hence, a

DOE O 151.1C FAQ

Program Elements: Categorization and Classification; Hazards Survey/Hazards Assessment (Technical Planning Basis)

Rev. 1

Approved: 04/02/09

decision to classify these events ensures a consistent and seamless integration of planning, preparedness, and response activities.