

Reclamation Manual

Directives and Standards

- Subject:** Identification and Reporting of Potential Hazardous Substances on Reclamation Acquired or Withdrawn Lands (Reclamation lands)
- Purpose:** Establishes the requirements and responsibilities for identifying and reporting potential hazardous substance release sites on Reclamation lands. The benefit of this Directive and Standard (D&S) is an increased employee awareness of potential hazardous substances and contamination on Reclamation lands that will result in a more efficient reporting process. In addition, this D&S will further quantify Reclamation's environmental liability.
- Authority:** Occupational Safety and Health Act (Public Law 91-596 as amended; 29 U.S.C. 651 et seq.; 29 CFR 1910); Federal Water Pollution Control Act (Clean Water Act) (Public Law 92-500 as amended; 33 U.S.C. 1251 et seq.); Toxic Substances Control Act (TSCA) (Public Law 94-469 as amended; 15 U.S.C. 2601 et seq.); Resource Conservation and Recovery Act of 1976 (RCRA) (Public Law 94-580 as amended by Public Law 95-609 and Public Law 98-616; 42 U.S.C. 6901 et seq.); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA/Superfund) (Public Law 96-510 as amended; 42 U.S.C. 9601 et seq.); National Oil and Hazardous Substances Pollution Contingency Plan, (National Contingency Plan) (Required by Public Law 96-510; 42 U.S.C. 9605; 40 CFR 300); Emergency Planning and Community Right to Know Act of 1986 (Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA)) (Title III of Public Law 99-499; 42 U.S.C. 11001 et seq.); Reclamation Manual Directive and Standard, *Required Training and Medical Surveillance for Hazardous Waste Operations and Emergency Response*, ENV 02-06; and applicable Executive Orders.
- Approving Official:** Director, Office of Program and Policy Services
- Contact:** Office of Program and Policy Services, Lands Resources Office, 84-53000
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1. **Purpose.** The intent of this D&S is to facilitate efficiency in identifying and reporting potential hazardous substance release sites by having all staff involved in any periodic or planned land review and inspection also being aware of both: (a) the possible presence of potential hazardous material and site contamination on Reclamation lands and (b) the required procedures to be employed when any such conditions are encountered.
2. **Activities.** Employees engaged in all types of field work must be cognizant of any potential hazardous substances or site contamination they may encounter. They must also be knowledgeable of the process required to report any such discoveries to the appropriate Hazardous Material (HazMat) official. (See Paragraph 3.B. Report.) Reporting the discovery of potentially contaminated sites is required in conjunction with field work

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associated with any land reviews being implemented, such as the periodic review of unneeded acquired lands or withdrawal reviews as well as all other field work being performed such as cultural resource surveys, land surveys and land-use reviews, recreation reviews, engineering and biological surveys, Environmental Management Systems audits, and the inspection and monitoring of permitted facilities and other authorized land uses taking place on Reclamation lands. This D&S defines the identification and reporting process. Compliance with this D&S does not in any way constitute compliance with Phase I Environmental Site Assessment as defined in American Society for Testing and Materials (ASTM) Standard No. E1527-05.

- A. **Training.** Pursuant to the requirements of ENV 02-06, awareness training shall be required for all Lands, Realty, Recreation and other appropriate personnel prior to engaging in field activities where they may encounter potential hazardous substances and hazardous waste. Paragraph 1.A. of [ENV 02-06](#) states, "All appropriate personnel shall receive training on recognition, safety, and appropriate response for hazardous wastes in the field, including wastes discovered incidentally in the performance of other duties."
 - B. **Use Caution.** With all sites that are potentially contaminated with hazardous substances, use caution when approaching. Employees must remain outside of the apparent perimeter of any contaminated site and, when possible, only approach any such site from an up-wind direction, paying close attention to any signs of danger. Drums and tanks must not be moved or disturbed. Unlabeled drums or containers must have their contents determined by proper sampling and testing methods. Do not sniff, inhale, touch, or make contact with any unknown substance. Under no circumstances should the employee try to move a drum or tank, or kick a container to determine the amount of contents. If a strong or unusual odor is detected, leave the area immediately in an up-wind direction.
3. **Employee Responsibilities.** Employees who encounter any observed indicators of hazardous substance releases (including those noted in Paragraph 4. Indicators and Actions) while conducting their normal field work are required to document and report such findings to the appropriate person as identified below. Observation and documentation will only be performed at a safe distance. Under no circumstances should field personnel closely approach potentially hazardous substances or contaminated sites unless specifically trained to do so.
 - A. **Document.** Employees conducting field work must document any observed indicators of potentially contaminated sites. Documentation must include the name of the person(s) performing the field work, the time and date of the field work, identification of the field work site, a brief description of the indicator as noted in Paragraph 4. Indicators and Actions, and the location of the indicator down to at least the nearest ¼ section. Map the access to the location of the potentially contaminated site

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(preferably on a U.S. Geological Survey (USGS) topographic map) providing approximate distances and landmarks. Whenever possible, the employee will take photographs of their findings.

- B. **Report.** Employees conducting field work must report any observed indicators of potentially hazardous substances or contaminated sites to both their supervisor and Facility or Area Office HazMat Coordinator or Regional HazMat Coordinator, as appropriate. Follow established reporting procedures and report hazardous substance incidents as soon as possible.
 - C. **Do Not Contaminate.** It is important that the employee takes precautions not to contaminate others. If an employee has been exposed to potentially hazardous substances, proper decontamination procedures must be followed. If a vehicle must be used to return from the field, take reasonable precautions and minimize additional exposure. Vehicles and equipment may require decontamination prior to use by others. Do not enter buildings or facilities without taking appropriate precautions or first following decontamination procedures.
4. **Indicators and Actions.** Common indicators of lands contaminated by hazardous substances, and actions to take, include:
- A. **Abandoned Cans, Drums or Large Tanks.** Note signs of leaking (stained soil) and condition (rusted, dented, bulging). Look for labels, but do not handle, any such cans, drums, or tanks. Note if labels are missing or note the contents if label is present. If the contents are visible, note the color and whether they are solids or liquid. Also note any stressed vegetation or dead animals near the spill.
 - B. **Abandoned Vehicle Batteries.** Note whether or not battery cases are intact and estimate the size of the area of any associated stains.
 - C. **Abandoned Vehicles or Construction Equipment.** Note the condition of the vehicles or equipment and the make and/or model, if possible. If a Vehicle Identification Number or license number can be located without risking exposure to hazardous substances, report that as well.
 - D. **Abandoned Storage Sheds.** Look for stains around the foundation. Do not open if strong or unusual odors are present.
 - E. **Suspicious Grouping of Trash Bags or Cans.** This can possibly indicate or be the remains of illegal drug manufacture especially if strong or unusual odors are present. If strong or unusual odors are detected, do not approach.
 - F. **Stained Soil.** Stained soil is a possible indication of a spill. The extent of the stain is a potential indicator of the amount spilled. Estimate the size of the stained area and note any stressed vegetation present.

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- G. **Stressed Vegetation.** Stressed vegetation can also be an indication of a spill. A localized group of dead, discolored, or stunted plants is often associated with stained soil. Estimate the size of the area, and note any stained soil.
- H. **Powdery Substances.** Do not approach or disturb any unknown piles of powdery substances or bags with such contents which have been compromised and show signs of leaking. Do not disturb packaging in an effort to obtain additional information as it may result in a leak or exposure to hazardous substances.
- I. **Burned Areas.** Insulated wire, equipment, and other materials illegally burned on Reclamation land to recover metals such as copper, lead, silver, etc., typically result in residues of plastics and metals left on the ground. Strong odors may be present. To avoid inhalation of, or contact with, particulates, personnel are advised not to enter these areas. Estimate the size of the area and make note of any observed conditions, stained soil, etc.
- J. **Other.** Being alert for anything unusual while conducting field work can help the employee avoid becoming contaminated and can potentially minimize or prevent the area from becoming contaminated. The presence of a group of pits or craters, unusual or strong odors, signs of heavy traffic down to, but not across, a stream, discolored surface water, and point source outfalls (pipes into streams), while not necessarily evidence of a release, are suspicious and should serve to increase awareness. Signage can often be found for unexploded ordnance, and land fill boundaries, either on or adjacent to Reclamation lands. Report any such signage you discover.