

EMERGENCY PREPAREDNESS & RESPONSE PROCEDURE



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1.0 POLICY

Utilization of Environmental Management Systems (EMS), as appropriate for our operations, to provide framework for systematically reviewing and reducing our environmental footprint.

2.0 PURPOSE

This document describes department's responsibilities for preparing and responding to a potential environmental emergency and/or incident, including spills and releases. This procedure further describes the City of Dallas (City) emergency response guidelines as it applies to the EMS program.

3.0 SCOPE

This procedure applies only to environmental emergencies resulting from City operations. Fire and natural disaster response are not included in this EMS procedure as they are handled by a separate function in the City of Dallas. (This exclusion of fire and natural disaster is also stated in the Guide to the City of Dallas Environmental Management System, OEQ-EMS-018, Section 4.4.7.)

4.0 RESPONSIBILITY

- **4.1** Office of Environmental Quality (OEQ) is responsible for:
 - 4.1.1 Assisting with emergency preparedness and response drills and/or exercises as needed:
 - 4.1.2 Annually requesting (at the end of the fiscal year) from departments within the EMS fenceline, documentation that these departments have reviewed their emergency preparedness and response procedures by the end of the fiscal year (see section 5.6);
 - 4.1.3 Providing technical assistance to City Departments during environmental emergencies;
 - 4.1.4 Responding to non-hazardous environmental incidents reported to OEQ by City Departments;

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- 4.1.5 Tracking all environmental incidents reported to OEQ by City departments with quarterly reporting to Public Works, Storm Water Management Section for inclusion in the Annual Report to TCEQ for the Municipal Separate Storm Sewer System (MS4) Permit No. WQ0004396000; Spills are tracked by volume and material type;
- 4.1.6 Providing department support and consultation in support of EMS implementation.
- 4.1.7 Notifying department EMRs of scheduled Office of Emergency Management (OEM) emergency drills or table top exercises upon receipt of such information from OEM.
- **4.2** Dallas Fire-Rescue is responsible for:
 - 4.2.1 Enforcing fire codes;
 - 4.2.2 Responding to fires at City facilities and minimizing associated environmental impact;
 - 4.2.3 Providing hazardous material training for Dallas Fire-Rescue staff as required;
 - 4.2.4 Initiating appropriate level of emergency response for environmental incidents:
 - 4.2.5 Maintaining, reviewing, and updating the Hazardous Materials and Oil Spills annex of the City's Master Emergency Operations Plan at least every 5 years, and when necessary;
 - 4.2.6 Conducting periodic drills/exercises that test potential emergency response situations and mitigation tactics;
 - 4.2.7 Providing training to affected Departments as requested;
 - 4.2.8 Periodically reviewing (at least annually by the end of the fiscal year) Dallas Fire-Rescue's emergency preparedness and response procedures, and submitting documentation that this review has been completed to OEQ by the end of the fiscal year (see section 4.1.2).
 - 4.2.9 Preparing an emergency evacuation plan for City Hall and Police & Courts Municipal Buildings. They also will review and approve evacuation plans for all City facilities. (This is a requirement of Administrative Directive 2-5 (Emergency Evacuation Plans), Section 4.3)
- **4.3** Dallas Police Department is responsible for:
 - 4.3.1 Responding to environmental emergency and non-emergency events as requested by the Dallas Fire-Rescue Department;

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- 4.3.2 Periodically reviewing (at least annually by the end of the fiscal year) Dallas Police Department's emergency preparedness and response procedures, and submitting documentation that this review has been completed to OEQ by the end of the fiscal year (see section 4.1.2).
- **4.4** Office of Emergency Management is responsible for:
 - 4.4.1 Communicating with appropriate City emergency first responders during a major environmental emergency;
 - 4.4.2 Activating the Emergency Operations Center (EOC) as needed to manage and coordinate strategic response efforts during environmental crisis or disaster situations when needed;
 - 4.4.3 Reviewing sections of the City's Master Emergency Operations Plan annually, and the entire plan every five (5) years, and when necessary, in particular after an occurrence of an incident or emergency situation warrants a change is needed;
 - 4.4.4 Offering table top exercises to City Departments as required by the Master Emergency Operation Plan.
- **4.5** Trinity Watershed Management, Storm Water Management Section is responsible for:
 - 4.5.1 Maintaining an inventory of absorbents and other supplies for hydrocarbon spill recovery and clean-up;
 - 4.5.2 Maintaining contracting ability for the waste yard to pickup and dispose of hazardous waste;
 - 4.5.3 Maintaining contracting ability to address emergency response for spills over 10 gallons;
 - 4.5.4 Responding to non-hazardous spills over 10 gallons and any spill that enters the storm drainage system per the appropriate Administrative Directive:
 - 4.5.5 Providing technical assistance as requested by Dallas Fire-Rescue or 3-1-1 dispatch operators;
 - 4.5.6 Maintaining an emergency contact list that is distributed monthly to designated personnel who are responsible for spill notification;
 - 4.5.7 Reporting spills and spill response activities to the TCEQ through the Annual Report for the Municipal Separate Storm Sewer System (MS4) Permit No. WQ0004396000;
 - 4.5.8 Periodically reviewing (at least annually by the end of the fiscal year) Public Works Storm Water Management Section's

emergency preparedness and response procedures, and submitting documentation that this review has been completed to OEQ by the end of the fiscal year (see section 4.1.2).

Note: Trinity Watershed Management is not an EMS department. However, TWM and PBW department directors have agreed that the Storm Water Management Section will remain in the EMS as though they were still within the PBW department.

- **4.6** Dallas Water Utilities is responsible for:
 - 4.6.1 Responding to environmental emergencies under this procedure as requested by OEQ, DFR, and/or PBW;
 - 4.6.2 Periodically reviewing (at least annually by the end of the fiscal year) Dallas Water Utilities' emergency preparedness and response procedures, and submitting documentation that this review has been completed to OEQ by the end of the fiscal year (see section 4.1.2).
- **4.7** Facility Manager/Supervisor are responsible for:
 - 4.7.1 Determining key emergency personnel, contact agency's details and emergency supplies needs and location;
 - 4.7.2 Identifying, with the EMR, the affected employees within the EMS fenceline that require environmental emergency response training;
 - 4.7.3 Ensuring that drills and/or table top exercises are conducted periodically.
 - 4.7.4 Ensuring that post-drill and post-incident evaluations are conducted and documented.
- **4.8** Environmental Management Representatives (EMRs) or site Environmental Coordinators are responsible for:
 - 4.8.1 Assisting the Department in identifying potential emergency situations as defined under this procedure;
 - 4.8.2 Assisting the Department on developing response procedures for potential environmental emergency situation;
 - 4.8.3 Following notification and reporting procedures according to AD 3-73 and 3-74.
 - 4.8.4 Assisting the Department with identifying abnormal or emergency conditions associated with environmental aspects

(see OEQ-EMS-001 (Environmental Aspects, Impacts, and Significance Criteria Procedure), Section 5.1.2).

- **4.9** City Employees are responsible for:
 - 4.9.1 Abiding and complying with Administrative Directives regarding environmental emergencies;
 - 4.9.2 Elimination or minimization of spills through use of best management practices;
 - 4.9.3 Reporting City spills through the appropriate process as outlined in their department's spill response procedure.

5.0 PROCEDURES

5.1 The City has procedures in place to mitigate environmental emergency response situations. Affected City of Dallas employees receive training on environmental emergency response and reporting. Environmental incidents, such as chemical materials releases to the land, air or water shall be reported to these numbers:

5.1.1 Emergency Number: 911 or (214) 670-3911

5.1.2 Non Emergency Number: 311 or (214) 670-5111

5.1.3 TCEQ Spill Reporting: 800-832-8234

5.1.4 National Response Center:800-424-8802

- **5.2** Environmental incident response efforts shall be conducted in accordance with the associated Administrative Directives (AD) 3-73 and 3-74.
- 5.3 Facilities which store chemicals shall have adequate spill clean up/neutralizing materials available onsite to control a spill which may cause an environmental impact.
- 5.4 Employees who are required to respond to spills shall be trained on spill response, clean up procedures and use of their onsite spill clean up kits in accordance with AD 3-73, AD 3-74.
- 5.5 OEM shall review sections of the City's Master Emergency Operations Plan annually, and the entire plan every five (5) years, and when necessary, in particular after an occurrence of an incident or emergency situation warrants a change is needed.
- 5.6 Departments within the EMS fenceline shall periodically review (at least annually by the end of the fiscal year) their emergency

preparedness and response procedures, and submit documentation that they have completed this review to OEQ by the end of the fiscal year (see section 4.1.2).

5.7 Departments within the EMS fenceline shall periodically test their emergency preparedness and response procedures where practicable.

6.0 RELATED DOCUMENTS

Administrative Directives (AD) 3-73 (Environmental Management Program) and 3-74 (Spill Response Procedures).

City of Dallas Master Emergency Operations Plan, Annex Q (Hazardous Materials and Oil Spill Response).

7.0 DEFINITIONS

7.1 <u>Environmental Emergency</u> – An urgent event or occurrence associated with City operations that either causes or has the potential to cause adverse changes to our surroundings and/or degradation of human health resulting in the need for immediate response.

8.0 CHANGE HISTORY - Rev 1

- 8.1 Reassigned responsibility for Table Top Exercises from OEM to OEQ.
- 8.2 Made extensive edits to the entire Responsibility section (Section 4.0).
- 8.3 Clarified emergency situations as "environmental" in Section 5.1. Also added TCEQ Spill Reporting and National Response Center telephone numbers.
- 8.4 Added references to spill response administrative directives in Section 5.2.
- 8.5 Changed interval to "periodically" in Section 5.3.
- 8.6 Added the words "annually and" to Section 4.1.2.
- 8.7 Added Section 5.6.

CHANGE HISTORY - Rev 2

- 8.8 Revised Sections 4.1.1, 4.1.2, 4.1.3, 4.1.4, 4.1.5, 4.1.6, 4.2.5, 4.4.2, 4.4.3, 4.5.3, 4.8.3, 5.3, and 5.5.
- 8.9 Added Sections 4.1.7, 4.2.8, 4.3.2, 4.4.4, 4.5.7, 4.5.8, 4.6.2, 5.6, and 5.7.

CHANGE HISTORY - Rev 3

- 8.10 Added second sentence in Section 3.0 verbatim from EMS Guide, Section 4.4.7, clarifying that fire and natural disaster response are not included in this EMS procedure.
- 8.11 Deleted Section 4.1.6 which required OEQ and OEM to conduct joint semiannual table top exercises.

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- 8.12 Added Section 4.1.7 as an OEQ responsibility to notify EMRs of scheduled OEM table top exercises when that information is received from OEM.
- 8.13 Added Section 4.2.9 from AD 2-5, Section 4.3 regarding DFR's responsibility to prepare, review, and/or approve emergency evacuation plans for City facilities.
- 8.14 Deleted the old Section 4.4.4 which required OEQ and OEM to conduct joint semiannual table top exercises.
- 8.15 Added a new Section 4.4.4 that documents that OEM is responsible for offering table top exercises to City Departments as required by the Master emergency Operation Plan.
- 8.16 Clarified in Section 4.5 that the Storm Water Management Section is now in Trinity Watershed Management, not PBT.
- 8.17 Added a note at the end of Section 4.5 clarifying that TWM and PBT department directors have agreed that the Storm Water Management Section will remain in the EMS as though they were still part of PBT.
- 8.18 Added a responsibility for Facility Managers/Supervisors in Section 4.7.4 that post-drill and post-incident evaluations are conducted and documented.
- 8.19 Added a responsibility for EMRs in Section 4.8.4 to assist departments with identifying abnormal or emergency conditions associated with environmental aspects. The aspect procedure (OEQ-EMS-001, Section 5.1.2) already requires that this information be determined for each aspect and impact.
- 8.20 Deleted Section 5.3 which required OEQ and OEM to conduct joint semiannual table top exercises.
- 8.21 Added Section 5.7 requiring EMS departments to periodically test their emergency preparedness and response procedures where practicable.
- 8.22 Added definition of "Environmental Emergency" in Section 7.1

