Chapter 16: Spills

Quick Start Summary

1 Who needs to know about these requirements

The requirements of Spills apply to workers discovering and responding to spills and their supervisors, project managers, field construction and service managers, and points of contact, the spills program manager, Waste Management, Environmental Protection, Radiation Protection, Facilities and Operations, SLAC Site Security, subcontractors, and the local fire department.

2 Why

Spills, defined as the unintentional release of any material that results in a potential hazard to human health, the environment, and/or property, must be contained and cleaned up in a manner that minimizes risk to human health, the environment, and/or property, and reported in compliance with Department of Energy (DOE) requirements and state and federal regulations.

3 What do I need to know

Workers are authorized to respond to spills only if all these conditions are met:
1. Handling the spilled material is already in their work planning and control documentation.
2. The appropriate personal protective equipment (PPE) and spill response material is available.
3. It is safe to do so.

Properly trained responders will handle all other spills. All spills must be reported, using SLAC’s incident notification procedure: for emergencies call 911, then SLAC Site Security (ext. 5555), then supervisor; for non-emergencies, call supervisor, then SLAC Site Security (security immediately if supervisor is unavailable). This ensures that management will be notified, the spill will be cleaned up safely, waste materials will be disposed of properly, and all reporting and recordkeeping requirements will be met.

4 When

The requirements of this chapter take effect 25 June 2021.

5 Where do I find more information

SLAC Environment, Safety, and Health Manual (SLAC-I-720-0A29Z-001)
- “Chapter 16, Spills”

Or contact the program manager.
Chapter 16

Spills

1 Purpose

The purpose of this program is to ensure all spills, defined as the unintentional release of any material that results in a potential hazard to human health, the environment, and/or property, are contained and cleaned up in a manner that minimizes potential risk and are reported in compliance with Department of Energy (DOE) requirements and state and federal regulations.

It covers spill response from discovery through notification, assessment, response, cleanup, and reporting for all types of spills, from those of domestic water or sewage that enters the storm drain system to radioactive and hazardous materials and waste. It applies to all workers discovering and responding to spills and their supervisors, project managers, field construction and service managers, and points of contact, the spills program manager, Waste Management, Environmental Protection, Radiation Protection, Facilities and Operations, SLAC Site Security, subcontractors, and the local fire department.

2 Roles and Responsibilities

Functional roles and general responsibilities for each under this program are listed below. More detailed responsibilities and when they apply are provided in the procedure and requirements.

The roles may be performed by one or more individuals and one individual may play more than one role, depending on the structure of the organizations involved. Responsibilities may be delegated.

2.1 Worker

- Reports all spills using SLAC’s incident notification procedure: for emergencies calls 911, then SLAC Site Security (ext. 5555), then supervisor; in non-emergencies, calls supervisor, then SLAC Site Security (security immediately if supervisor is unavailable)
- Follows proper spill response actions and never attempts to control or cleanup a spill that poses a risk to human health, for which he or she is unsure of hazards posed or ways to mitigate them, or for which he or she has not already been authorized via work planning and control to handle the spilled material
- Wears appropriate personal protective equipment (PPE) and uses compatible spill response material

2.2 Supervisor

- Ensures workers know the notification protocol and carry it out
Ensures workers know how to assess spills and are aware of which types of spills they are authorized to address

Ensures that workers’ work planning and control documentation includes spill hazards and mitigation measures applicable to their job description and that workers complete required training

2.3 Subcontractor

In addition to all responsibilities of a worker, reports all spills to the SLAC project manager and/or field construction manager (FCM) immediately or as soon as reasonably possible

2.4 Project Manager / Field Construction Manager

Includes spill hazards and mitigation measures in relevant work planning and control documentation

2.5 SLAC Site Security

Carries out required notifications whenever a spill is reported (including the SLAC duty officer as part of the incident reporting and investigation process, spills program manager, the Waste Management Group, the Radiation Protection Department, and other appropriate support personnel)

Provides traffic control and/or cordon off a spill area as needed

Assists emergency responders as needed

2.6 Local Fire Department

Provides professional spill response and containment

2.7 Waste Management Group

Provides containers, cleanup material, and equipment to contain spills

Provides guidance for spill equipment

Arranges cleanup of non-emergency spills as needed

Responds to spills during business hours and provide backup during non-business hours

Provides oversight of subcontracted spill responders

Assists emergency responders as needed

2.8 Radiation Protection Department

Responds to radioactive material spills and acts as the ESH contact

Reports radioactive material spills to regulatory agencies as needed

Prepares follow-up written reports, as required
2.9 Facilities and Operations Division

- Responds to water and sewage spills caused by broken pipes or back-ups and assists with cleanup
- Shuts off valves to minimize the spill
- Contacts sanitary sewer plumbing subcontractor as needed to clear pipes

2.10 Spills Program Manager

- Assists personnel in identifying spill prevention measures
- Reviews constructions plans for spill prevention controls
- Documents and evaluates the environmental impact of spills
- Confirms proper cleanup completed
- Meets internal notification and tracking requirements, including completing a spill report form and maintaining a record of spill report information
- For non-radioactive spills that exceed reportable quantities, reports spills to regulatory agencies
- Prepares follow-up written reports as required
- Identifies corrective actions resulting from a spills incident investigation

3 Procedures, Processes, and Requirements

These documents describe the detailed requirements for this program and how to implement them:

- Spills: Response, Cleanup, and Reporting Procedures (SLAC-I-750-0A16C-006). Describes procedures for response, cleanup, and reporting for all types of spills

These are the forms and tools for this program:

- Spills: Spill Report Form (SLAC-I-750-0A16J-003). Form for recording spill details and notification

These are other program documents and resources:

- SLAC Spill Prevention, Controls, and Countermeasures Plan (SLAC-I-750-0A16M-001) (includes detailed requirements concerning storage tanks required under 40 CFR 112.2)

4 Training

4.1 Worker

Basic spill awareness training is included in the following course:

- ESH Course 219, Environmental Safety and Health Orientation (ESH Course 219)

Personnel who have completed this course may stop, contain, and cleanup spills of non-hazardous material.
There are multiple courses that address spill response as it applies to a broader subject. For example, Chapter 17, “Hazardous Waste”, Chapter 40, “Chemical Lifecycle Management”, Chapter 52, “Hazardous Materials and Waste Transportation”, Chapter 53, “Chemical Safety”, and Chapter 58, “Laboratory Safety”, have training requirements for workers who have responsibilities for hazardous materials or waste; Chapter 26, “Stormwater”, for those who perform activities outdoors that have the potential to impact stormwater run-off; and Chapter 9, “Radiological Safety”, for those entering radiologically controlled areas or who handle radioactive materials. Information on these courses can be found in the “Training” section of these chapters.

4.2 Oil Handler / SLAC Emergency Responder

Workers who are oil handlers (working with oil in quantities of 55 gallons or greater) or SLAC emergency responders (SLAC personnel whose duties involve responding to emergencies, including oil discharges) must complete this course:

- ESH Course 169, Spill Prevention and Response Training (ESH Course 169)

Emergency spill responders must also have training as defined in 8 CCR 5192.

For more on specialized spill prevention and response training and other requirements, see the SLAC Spill Prevention, Controls, and Countermeasures Plan.

5 Definitions

discoverer. Person(s) who discovers spill and takes appropriate actions (compare with responder and emergency responder)

hazardous material. Any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or threatened hazard to human health and safety or to the environment if released into the workplace or the environment

oil handler. Person working with oil in quantities of 55 gallons or greater, including drums, tanks, generators, or mobile refueling trailers

responder. Person(s) who takes appropriate actions to minimize impacts of spill in accordance with their work planning and control documentation (compare with emergency responder)

responder, emergency. Person(s) with the training and medical surveillance required to respond to chemical releases that could expose them to health hazards, such that the releases are controlled and cleaned up in a safe and healthful manner so as not to endanger themselves or other employees. At SLAC, spills emergency responders are generally the local fire department or a subcontracted spills responder.

responder, SLAC emergency. SLAC personnel whose duties involve responding to emergencies, including oil discharges

safety data sheet (SDS). A document produced by chemical manufacturers and importers to relay chemical, physical, and hazard information about specific substances
spill. The unintentional release of any material that results in a potential hazard to human health, the environment, and/or property. Spills at SLAC are classified as follows:

- **non-emergency.** There is no potential exposure risk to human health, no uncontrollable imminent threat to the environment, and no potential damage to valuable or mission-critical property, and
  - The spill consists of a material the nature and potential hazards of which are known (this includes accidental releases of domestic water and low conductivity water)
  - The spill can be cleaned up with readily available spill response cleanup equipment and supplies

- **emergency.** There is a potential exposure risk to human health or an uncontrollable imminent threat to the environment, and any of the following apply:
  - The spill consists of material that has hazards unfamiliar to personnel
  - The spill is regarded by personnel as posing a potential exposure risk to human health
  - The spill contains a significant amount of hazardous material that cannot be prevented from migrating into a storm drain
  - The spill creates a gas plume with the potential to move off-site into the surrounding community
  - The spill poses a risk of damage to valuable or mission-critical property

## 6 References

### 6.1 External Requirements

The following are the external requirements that apply to this program:

  - Part 110, “Discharge of Oil” (40 CFR 110)
  - Part 112, “Oil Pollution Prevention” (40 CFR 112)
  - Part 117, “Determination of Reportable Quantities for Hazardous Substances” (40 CFR 117)
  - Part 300, “National Oil and Hazardous Substances Pollution Contingency Plan” (40 CFR 300)
  - Part 302, “Designation, Reportable Quantities, and Notification” (40 CFR 302)
  - Part 355, “Emergency Planning and Notification” (40 CFR 355)
  - Chapter 6.67, “Aboveground Storage of Petroleum” (HSC Chapter 6.67)
6.2 Related Documents

SLAC Environment, Safety, and Health Manual (SLAC-I-720-0A29Z-001)
- Chapter 9, “Radiological Safety”
- Chapter 17, “Hazardous Waste”
- Chapter 26, “Stormwater”
- Chapter 37, “Emergency Management”
- Chapter 40, “Chemical Lifecycle Management”
- Chapter 43, “Industrial Wastewater”
- Chapter 52, “Hazardous Materials and Waste Transportation”
- Chapter 53, “Chemical Safety”
- Chapter 58, “Laboratory Safety”

Other SLAC Documents
- Chemical Management Services (includes safety data sheets)
- Emergency Management Plan (SLAC-I-730-0A14A-003)
- Incident Reporting and Investigation Process (SLAC-I-701-O03-006-00)
Chapter 16: Spills

Response, Cleanup, and Reporting Procedures

1 Purpose

The purpose of these procedures is to ensure spills, defined as the unintentional release of any material that results in a potential hazard to human health, the environment, and/or property, are handled in a safe manner and properly reported. They cover response, cleanup, and reporting for all types of spills. They apply to all workers discovering and responding to spills and their supervisors, project managers, field construction and service managers, and points of contact, the spills program manager, Waste Management, Environmental Protection, Radiation Protection, Facilities and Operations, SLAC Site Security, subcontractors, and the local fire department.

2 Procedures

The discoverer is the person who discovers a spill. The responder is the person who responds to and/or cleans up a spill. In some cases these two roles are played by the same person, in others by different persons.

It is essential that

- Only workers who have already been authorized via work planning and control to handle the spilled material and completed necessary training act as responders
- Waste Management (WM) Group (or after hours the local fire department) determine spills that require specialized spill responders and arrange for cleanup
- External or internal emergency hazardous materials responders such as the local fire department handle uncontrollable spills with the potential to cause serious harm to human health or the environment

For an overview of spill response, see Figure 1.
Figure 1 Spill Response Flow Chart

2.1 Notification

2.1.1 Emergency Spills

A spill is an emergency when it poses a serious threat to human health or the environment. Emergency spills must be handled by external or internal emergency hazardous materials responders.

<table>
<thead>
<tr>
<th>Step</th>
<th>Person</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Discoverer</td>
<td>Moves to a safe location</td>
</tr>
<tr>
<td>2.</td>
<td>Discoverer</td>
<td>Calls 911 immediately and provides the following information to the operator:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Location</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Any injuries</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Spilled material description</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Quantity spilled</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Any potentially radioactive material</td>
</tr>
</tbody>
</table>
### 2.1.2 Non-Emergency Spills

A spill is a non-emergency when it is not life threatening and will not result in serious environmental damage.

<table>
<thead>
<tr>
<th>Step</th>
<th>Person</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Discoverer</td>
<td>Notifies supervisor (subcontractor notifies supervisor and SLAC project manager / field construction manager); goes to step 2 immediately if supervisor is unavailable</td>
</tr>
<tr>
<td>2.</td>
<td>Discoverer</td>
<td>Calls SLAC Site Security (ext. 5555 or 650-926-5555 from a cell phone) to report:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Location</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Any injuries</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Spilled material description</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Quantity spilled</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Any potentially radioactive material</td>
</tr>
<tr>
<td>3.</td>
<td>SLAC Site Security</td>
<td>Notifies required responders as needed, plus</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- SLAC duty officer (as part of the incident reporting and investigation process)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Spills PM, WM and others such as RP and Facilities, as needed</td>
</tr>
</tbody>
</table>
### 2.2 Spill Response and Cleanup

<table>
<thead>
<tr>
<th>Step</th>
<th>Person</th>
<th>Action</th>
</tr>
</thead>
</table>
| 1.   | Discoverer | Proceeds to clean up spill (goes to step 2), only if all of the following conditions are met:  
- Is already authorized via work planning and control to handle spilled material  
- Appropriate personal protective equipment (PPE) is available  
- Compatible spill response material is readily available in sufficient quantity  
- Cleaning up the spill is safe  
**Warning:** if any of these conditions are not met, does not attempt to clean up the spill, stays in a safe area, and waits for specialized responders |
| 2.   | Responder | Controls access; prevents passersby from entering the spill area  
Takes steps as needed:  
- Requests any needed spill cleanup materials and waste containers from Waste Management (WM)  
- Refers to [safety data sheet (SDS)] for applicable PPE and hazard information  
- Refers to spill kit instructions  
- Prevents spilled material from entering storm drains by placing berms or other suitable material  
- Prevents spilled material from entering the sanitary sewer system (floor drains, sinks) by placing absorbent pads or other suitable material |
| 3.   | WM | Provides requested spill cleanup materials and waste containers |
| 4.   | Responder / WM / Radiation Protection Department (RP) | Captures all impacted media:  
- May involve spreading absorbent material on entire spill area  
- If spill area includes hazardous material on an unpaved surface, removes all affected soil  
**Note:** sampling may be required to ensure adequate cleanup. |
| 5.   | Responder / WM / RP | Places all spilled material and absorbent material in provided waste container(s)  
**Note:** sample analysis may be required to determine appropriate disposal. |
| 6.   | Responder / WM | Unplugs storm drains, floor drains, and sink drains, if applicable |
| 7.   | Responder / WM / RP | Ensures PPE and spill cleanup equipment is appropriately managed  
- Decontaminates equipment as needed  
- Places disposables and expendables in appropriate waste containers |
| 8.   | Responder | If needed, requests waste container pickup using the [Hazardous Waste Pick-Up and Empty Container Request Form](#) |
| 9.   | WM / RP | Arranges for waste pickup and management |
| 10.  | Spills program manager | Ensures reporting requirements are met (see below) |
2.3 Reporting

The following reporting requirements apply to all types of spills.

<table>
<thead>
<tr>
<th>Step</th>
<th>Person</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Spills program manager</td>
<td>Confirms proper cleanup completed</td>
</tr>
<tr>
<td>2.</td>
<td>Spills program manager</td>
<td>Evaluates spill to determine regulatory notification requirements and meets them, as listed on the spill report form</td>
</tr>
<tr>
<td>3.</td>
<td>Spills program manager</td>
<td>Completes a <a href="#">spill report form</a></td>
</tr>
<tr>
<td>4.</td>
<td>Spills program manager</td>
<td>Records spill details</td>
</tr>
<tr>
<td>5.</td>
<td>RP</td>
<td>For spills that involve radioactive materials, meets regulatory agency reporting requirements</td>
</tr>
</tbody>
</table>

3 Forms

The following forms and systems are required by this procedure:

- [Spills: Spill Report Form](#) (SLAC-I-750-0A16J-003). Form for recording spill details and notification

4 Recordkeeping

The following recordkeeping requirements apply to all spills:

- For every spill, the spills program manager completes and maintains a spill report form and records the details

5 References

**SLAC Environment, Safety, and Health Manual** (SLAC-I-720-0A29Z-001)

- Chapter 16, “Spills”
  
  - [SLAC Spill Prevention, Controls, and Countermeasures Plan](#) (SLAC-I-750-0A16M-001) (includes detailed requirements concerning storage tanks required under [40 CFR 112.2](#))

- Chapter 17, “Hazardous Waste”
  
  - [Hazardous Waste Pick-Up and Empty Container Request Form](#) (SLAC-I-800-0A08R-001)

Other SLAC Documents

- [Chemical Management Services](#) (includes safety data sheets)
- [Incident Reporting and Investigation Process](#) (SLAC-I-701-O03-006-00)
## Instructions
This form is to be completed and retained by the ESH spills program manager following the Spills Response, Cleanup, and Reporting Procedures (SLAC-I-750-0A16C-006).

### SPILL / RELEASE DESCRIPTION

<table>
<thead>
<tr>
<th>Substance released:</th>
<th>CAS No. (if available)</th>
<th>Approx. quantity released</th>
<th>Reportable quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Spill date (mo/day/yr)**
- Spill start time: [ ] a.m.  [ ] p.m.
- Spill end time: [ ] a.m.  [ ] p.m.
- Continuous flow
- Intermittent flow
- Discrete release

- Occurring at time of discovery? [ ] Yes  [ ] No

**Primary mass contacted** (check all that apply)
- Asphalt
- Concrete
- Soil
- To atmosphere

**The primary mass entered** (check all that apply)
- Sewer, manhole number:
- Storm drain, catch basin number:
- Creek
- Atmosphere

**Location (area, building number, room no. if applicable)**
Attach photos and/or spill area diagram to the report.

**Describe the circumstances leading to the spill.**

**List immediate actions taken to stop / control / contain the spill and describe the results. (calls made, equipment used)**

**Proper cleanup completed?** [ ] Yes  [ ] No

**Initials of the reviewer:** ____________

**Cleanup method used:**

### CONTACT INFORMATION

**Person reporting spill (name):**
- Title:  
- Directorate / Dept:  
- Ext:  
- Mailstop:

**Person initiating form (name):**
- Title:  
- Directorate / Dept:  
- Ext:  
- Mailstop:

### NOTIFICATION AND REPORTING

If a spill exceeds a reportable quantity, the ESH spills program manager will immediately notify the appropriate regulatory agency (contact information below).

Provide details by phone or website and follow up with a report, as required.

<table>
<thead>
<tr>
<th>Substance</th>
<th>Reportable Quantity</th>
<th>State Office of Emergency Services (OES)</th>
<th>State Water Resources Control Board(SWRCB)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chemicals</td>
<td>See 40 CFR 302</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Mercury (into environment)</td>
<td>1 pound</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Oil (in or on state waters)</td>
<td>42 gallons</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Sewage</td>
<td>Any</td>
<td>See SSO flowchart</td>
<td>See SSO flowchart</td>
</tr>
<tr>
<td>Other spills</td>
<td>See spill reporting binder (red) in Building 041, Room 1044 (EP Library), EPA I.D. No. CA8890016126</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Agency Contact Log (to be completed by the ESH spill program manager)

<table>
<thead>
<tr>
<th>Agency</th>
<th>Contact</th>
<th>Contact Person</th>
<th>EP Contact Person</th>
<th>Time</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>State Office of Emergency Services (OES)</td>
<td>800-852-7550</td>
<td>OES control #</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>State Water Resources Control Board (SWRCB)</td>
<td>ciwqs.waterboards.ca.gov/</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Causal Analysis
- Design / engineering
- Equipment / material
- Human performance / error

**Significance Level**
- Serious
- Important
- Minor

**Responsibility for Spill**
- Non-SLAC
- Subcontractor
- SLAC Department

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25 June 2021

SLAC-I-750-0A16J-003-R004
Sanitary Sewer Overflow (SSO) Reporting Requirements

Did SSO enter channel or surface water (or unable to recover from drain system)?

No

Category 1 SSO

Yes

Greater than 1000 gallons?

No

Category 2 SSO

Yes

Within 2 hours, notify CalOES: (800) 852-7550

Category 3 SSO

Greater than 50,000 gallons?

No

Water quality sampling is required within 48 hours. Submit technical report via CIWQS within 45 calendar days of the SSO end date.

No

Draft report required via CIWQS within 3 business days. Certified report required via CIWQS within 15 calendar days of the SSO end date.

Yes

Certified report required via CIWQS within 30 calendar days of end of calendar month in which SSO occurs.

Abbreviations and contact information:

Cal OES = California Office of Emergency Services, (800) 852-7550
SSO = sanitary sewer overflow

The Water Resources Control Board order on which this flow chart is based is available here:
# 851>Cal/OSHA Implementation Plan: Spills

This form is for documenting changes to a program and the program’s supporting resources (ESH Manual chapter or similar program description, training courses, databases, and so on) resulting from the adoption of the model Revolutionary Working Group (RWG) contract (see below) and the associated DOE variance from 10 CFR 851, “Worker Safety and Health Program”. The purpose is to ensure consistent, concise descriptions of the resulting changes. The form is to be completed by the program manager and sent to the DOE as a cover sheet with the revised documents. The general process is as follows:

1. Program manager completes form
2. Changes to program resources made and reviewed following normal revision processes
3. DOE sent draft form and revisions
4. Changes to program resources published
5. DOE sent final form and revisions

## 1 Introduction

The RWG model contract and 10 CFR 851 variance are intended to simplify and improve the implementation of worker safety and health requirements by tailoring the laws, regulations, and standards that apply while achieving a level of protection equivalent to the requirements of 10 CFR 851. This mostly entails replacing federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910 and 1926) with Cal/OSHA regulations (8 CCR) as external requirements to be complied with but may also involve other laws and regulations and either different versions of industry standards than those cited in 10 CFR 851 or entirely different standards. (One purpose of this form is to capture the specific changes in external requirements for each program.) (For more information on this effort, see the variance application in 851>Cal/OSHA resources.)

## 2 Plan

<table>
<thead>
<tr>
<th>Field Number</th>
<th>Field Name</th>
<th>Field</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Program name</td>
<td>Spills</td>
</tr>
<tr>
<td>2.</td>
<td>Program manager</td>
<td>Hug, Michael B.</td>
</tr>
<tr>
<td>3.</td>
<td>LBNL counterpart</td>
<td>Not listed (SME list) (LBNL Phonebook)</td>
</tr>
</tbody>
</table>
| 4.           | Program documents   | The following is a list of existing program documents, to be reviewed by the program manager to determine which will need to be revised to reflect 851>Cal/OSHA changes.  
  - ESH Manual Chapter 16: Spills  
  - Spills: Quick Start Summary  
  - Spills: Response, Cleanup, and Reporting Procedures  
  - Spills: Spill Report Form  
  - SLAC Spill Prevention, Control and Countermeasures Plan |
| 5.           | Training courses    | The following is a list of existing training courses, to be reviewed by the program manager to determine which will need to be revised to reflect 851>Cal/OSHA changes.  
  *Course materials are available for review.*  
  - ESH Course 219, Environmental Safety and Health Orientation (ESH Course 219) |
6. Other program resources

- None

7. Current external requirements

- Title 33, United States Code, “Navigation and Navigable Waters”, Chapter 26, “Water Pollution Prevention and Control” (33 USC Chapter 26)
9. Proposed external requirements

List all the external requirements that will apply to this program. To determine, start by looking up existing external requirements in [851>Cal/OSHA resources (variance, gap analysis, and contract) and finding replacements (for example a specific section in 29 CFR 1910 to a specific section in 8 CCR or a current version of an industry standard)](29 CFR 1910.119). Where Cal/OSHA requirements are less stringent than those of 10 CFR 851, check with Jeremy Sawyer on which to use. **Enter “no changes” if none.**

- Remove “Hazardous Waste Operations and Emergency Response” (29 CFR 1910.120)
- Remove WAT 13200–13272
- Remove 24 CCR Part 9, Chapter 34
- Remove 24 CFR Part 9, Chapter 27

9. Proposed substantive changes

Describe (list) the substantive changes to be made in the program, based on the new external requirements. **Enter “no changes” if none.**

- No changes

10. Additional proposed substantive changes

Describe (list) the substantive changes to be made in the program, in addition to those based on the new external requirements. For example, those due to stakeholder input, other reviews and audits, operating experience. **Enter “no changes” if none.**

- No changes

11. Affected program documents

List program documents affected by the changes above. **Enter “no changes” if none.**

- Spill Chapter

12. Affected training courses

List training courses affected by the changes above. **Enter “no changes” if none.**

- No changes

13. Other affected program resources

List other program resources affected by the changes above. **Enter “no changes” if none.**

- No changes

14. Comments/Questions/Issues

Any comments or questions regarding applicable requirements or changes. **Add any comments or questions regarding applicable requirements or changes.**

- No changes

15. Status

- [ ] Initial draft (proposed changes)
- [ ] Draft (for DOE review)
- [ ] Final (published changes)

16. Date completed

Date (of form, PM to complete)