

**ANYTOWN USA**  
**EMERGENCY RESPONSE GUIDE**

**1.0 INTRODUCTION**

**1.1 PURPOSE**

The Anytown USA=s emergency response guide is a written set of procedures to define staff responsibilities and outline Standard Operating Procedures (SOP=s) to be followed in response to emergency situations. This guide is intended to: (1) safeguard the health and well being of plant personnel and the public; (2) minimize damage to plant facilities; and (3) reduce discharge violations resulting from the emergency. It should be noted that these objectives are listed above in a hierarchy of decreasing priority; that is, consideration of health and public safety have priority in case of conflict with other considerations. A fourth objective of this document, relating to the others is to assure that local and state emergency management officials receive appropriate and timely notification of emergency situations.

To achieve these objectives, ANYTOWN USA staff should become aware of and periodically refresh their memories of the procedures included in this publication.

**1.2 OBJECTIVES**

This emergency response guide is tailored to identify and provide Standard Operating Procedures (SOP=s) for emergency events that could occur at the Anytown USA Wastewater Treatment Plant on River Street in Anytown USA, and at the remote

pump stations, maintenance shop and other facilities operated by the ANYTOWN USA Facility. Emergency procedures at the plant are discussed in Sections 3 through 9. Remote facilities are specifically addressed in Section 9 of this guide, although many of the procedures discussed in earlier sections are relevant to remote ANYTOWN USA locations.

The guide defines elements of the emergency organization by identifying those positions responsible for emergency response. The names of the staff currently holding these positions are presented in Appendix A. Procedural guides (SOP=s) are presented that are to be observed by these designated positions and response agencies in the event an unexpected situation arises. The emergency response guide addresses the general emergency events outlined in 1.3 below.

### **1.3 SIGNIFICANT EMERGENCY EVENTS**

The following lists the most significant major emergencies that might occur at ANYTOWN USA facilities:

- Accidental injury and medical emergency
- Fire and explosion
- Wind damage and flooding
- Earthquakes
- Release of sewage
- Unauthorized discharge to the ANYTOWN USA system

SOP=s are presented herein for each of these emergencies, as well as for

emergency evacuation of the facilities that may result from such events.

#### **1.4 NEW HAMPSHIRE EMERGENCY RESPONSE PLAN: THE STATE EMERGENCY RESPONSE COMMISSION AND LOCAL EMERGENCY MANAGEMENT COMMITTEES**

The procedures set forth in this guide are designed to mitigate the effects of emergencies and to comply with state and federal laws, and local ordinances established to protect public safety.

Because the ANYTOWN USA utilizes materials that are classified [by Title III of the Superfund Amendment Reauthorization Act (SARA Title III) and other legislation] as hazardous wastes, and because a sewer system is always at risk of receiving an unauthorized discharge of hazardous materials, it is essential that ANYTOWN USA staff be familiar with emergency response procedures. An essential component of emergency response is compliance with the state=s emergency response plan, (*A The New Hampshire Hazardous Materials Incident Emergency Response Plan*) attached to this guide as Appendix B.

A cornerstone of this plan is the Emergency Operations Committee (EOC) set up in the municipality to provide a local focus for *ARight to Know* disclosure and for emergency response to hazardous materials incidents. EOC=s must be informed, via what is called *ATwo Tier SARA Title III reporting* of industrial use of hazardous materials, and the EOC=s and specifically the emergency management director of the local EOC must be given timely notification of emergencies involving such materials, so that he or she may be involved in off-site management of such incidents.

Appendix A-3 is a listing of local Emergency Management Directors/ Emergency Operations Committees that might be involved should a hazardous materials-related emergency response need to be mounted as a result of ANYTOWN USA operations. As can be seen by an inspection of Appendix A-3, fire chiefs (example of chiefs for communities specific to the area) are directors of many local EOC=s. Also, included in the roster is a town manager, a public works director, a police chief, and two road agents.

Should a hazardous materials emergency develop within the ANYTOWN USA, the ANYTOWN USA is required to notify the local EOC/Emergency Management Director of the municipality in which the incident has taken place. The **New Hampshire State Police Communications Center (SPCC) should also be contacted at 1-800-346-4009** to report the incident. The SPCC operates 24 hours a day, 7 days per week. The EOC for Anytown USA, the most likely ANYTOWN USA community in which a hazardous materials emergency would develop, is centered about the Anytown USA Fire Department, also a 24-hour-a-day operation.

## **2.0 EMERGENCY RESPONSE TEAM**

### **2.1 GENERAL**

In the event of a major plant emergency, command structures in the form of Emergency Response Teams (ERT=s) for the plant and for remote locations are established to insure personnel safety and equipment integrity. Staff are expected to follow the directives of the appropriate Emergency Response Team for the duration of

the emergency. The ERT=s for both the plant and for remote locations consist of the members and alternates as shown in paragraphs 2.3 and 2.4 below.

**2.2 EMERGENCY RESPONSE TEAM LEADER**

In an emergency situation, the ERT leader is responsible for the initial assessment of the emergency. At the ERT leader=s command, personnel will be notified to begin evacuation in a safe and orderly fashion to the emergency assembly area. The emergency assembly area is the location for obtaining head counts and administering necessary first aid. These activities will be coordinated through ERT members as shown below.

**2.3 ERT MEMBERS: ANYTOWN USA TREATMENT PLANT, RIVER STREET PUMP STATION, AND SPILLS TO THE SEWER SYSTEM**

<u>POSITION</u>	<u>DESIGNATE</u>	<u>ALTERNATE(S)</u>
Leader	Superintendent	Administrator/Chief Operator
Member	Chief Operator	Operations Supervisor
Member	Operations Supervisor	Operator II
Member	Industrial Pretreatment Coordinator	Engineering Technician IV
Member	Plant Safety Officer	

**2.4 ERT MEMBERS: REMOTE LOCATIONS (EXCEPT RIVER STREET PUMP STATION AND SPILLS TO THE SEWER SYSTEM)**

<u>POSITION</u>	<u>DESIGNATE</u>	<u>ALTERNATE(S)</u>
Leader	Mechanical Maintenance Manager	Machinist Foreman
Member	Electrical/Electronics Supervisor	Machinist Foreman
Member	Superintendent	Administrator
Member	Plant Safety Officer	

A current listing of ERT members and other key emergency personnel (ANYTOWN USA EMERGENCY MATRIX) is included as an Appendix A-1 to this Guide.

**3.0 EMERGENCY EVACUATIONS – ANYTOWN USA WWTP**  
**STANDARD OPERATING PROCEDURES**

**3.1 EVACUATION PLAN - GENERAL**

**3.1.1** There may be emergency situations where it becomes necessary to evacuate the plant.

**3.1.2** In order to prepare for such an event, an emergency evacuation plan map is

posted near the ARight-To-Know≅ area of the plant. This plan map identifies the emergency primary and secondary assembly areas and the evacuation routes to be taken to safely leave the facility.

**3.1.3** Personnel will be instructed to evacuate the plant via announcement on the plant=s PA system (beige phones).

**3.1.4** Employees evacuating the plant will meet at the designated assembly area. The primary assembly area, to be used in most evacuation emergencies is the front gate (River Street) of the treatment plant compound.

**3.1.5** The PA announcement of the impending evacuation will note the character of the emergency.

**3.1.6** Should a training session be held at the training center, an ERT member or designate shall supervise the evacuation of persons at the training center.

**3.1.7** Outside contractors working on-site or visitors should sign-in at the visitor=s register. The register should include the ANYTOWN USA staff person with whom the visitor/contractor is visiting. Visitors should be verbally briefed on actions they should take if an evacuation of the facility occurs during their visit.

### **3.2 EVACUATION PLAN - FIRE AND EXPLOSION STANDARD OPERATING PROCEDURE**

**3.2.1** If a fire is detected in the plant, the person observing the fire will notify the ERT leader or other ERT member via the PA system, including in this notification an assessment of the fire/explosion. Only in the incipient stage may fire be fought and then only with a fire extinguisher appropriate for the fire. Developed fires should be left to the Anytown USA Fire Department. (See SOP for fire and explosion emergency, paragraph 5.2.)

**3.2.2** Persons will evacuate the plant if so instructed by the ERT leader or ERT member in charge. Evacuation orders will be announced on the PA system. Should the training center be conducting classes, an ERT member will proceed to the training center to supervise evacuation.

**3.2.3** All persons evacuating the plant should meet at the primary assembly area (front gate). Supervisors will be responsible for head counts of their subordinate staffs. Should a supervisor be unavailable, that supervisor's supervisor will assume this responsibility. Should the training center be evacuated, the attendance list for that day's class will be used for the head count, which will be taken by the class supervisor.

**3.2.4** *All persons on the plant compound will be counted at the assembly area as in*

*3.2.3 immediately after the evacuation has been completed.* The names of persons who remain unaccounted for after this head count will be provided to the fire department staff called to the plant for the emergency.

#### **4.0 ACCIDENTAL INJURY OR MEDICAL EMERGENCY - STANDARD OPERATING PROCEDURE**

In the event of personal injury or medical emergency, assess the nature of the emergency. It is important that the injured person not be moved if the injury is severe enough that moving will aggravate the injury. **Also, rescuers must not place themselves in danger by entering an area (for example, a confined space) to remove an injured co-worker except in compliance with Standard Operating Procedures for entering those areas.** With these exceptions, which admittedly require some judgment, injured workers should be removed from any recurring danger, and medical emergency response summoned.

Make the worker as safe, warm and comfortable as possible. Aside from administering artificial respiration, cardiopulmonary resuscitation (CPR), or stopping severe bleeding, allow the medical emergency response personnel when they arrive to provide medical attention and, if necessary, transportation to the hospital. The emergency phone number for **medical response and ambulance service, is 911.** Remember that while the 911 system will know the phone number and location from which you are phoning, you should provide the dispatcher your name, nature and location of the emergency, and at what phone number you may be reached if you are

leaving the phone from which you called.

First Aid Centers are located at the plant, just outside the cafeteria, and at the maintenance shop, in the men=s bathroom. All of the ANYTOWN USA=s service trucks, and the van, contain first aid kits.

## **5.0 FIRE AND EXPLOSION**

### **5.1 GENERAL**

It is important to note that there are no fire and/or smoke detection systems in operation at the Anytown USA Treatment Plant, the maintenance shop or the pumping stations. Such alarms will be an integral part of the new supervisory control and data acquisition (SCADA) system currently being designed for the ANYTOWN USA, but construction for the SCADA system is not going to be completed until the middle of the year 2000.

Because there are no alarms, ANYTOWN USA personnel will likely have no advance warning of a fire, and should be prepared to identify a fire by the sight of smoke or flames in the plant or pump stations. The fire may be identified by the scent of smoke or the heat it gives off. Remember that any equipment malfunction alarm may be the result of a fire at or near that equipment, and be alert to this potential whenever you respond to an alarm.

Fires or explosions that may occur at ANYTOWN USA facilities will probably be caused by short circuits or by burning motors, by methane gas produced in the treatment plant digesters, or by flammable materials discharged to sanitary sewers.

## 5.2 FIRE AND EXPLOSION - STANDARD OPERATING PROCEDURE

Personnel discovering a fire should assess the potential for the fire spreading throughout and outside the limits of the plant. They should consider whether or not they should attempt to extinguish the fire themselves or if they should abandon the area and allow the local fire department to extinguish it using the following criteria which admittedly require the employee to exercise his or her best judgment:

Should an employee encounter an incipient fire (that is, a fire that is just getting started), the employee may attempt to extinguish the fire using the fire extinguishers and other tools available at the plant, but only if he is familiar with the use of such equipment. **If initial attempts fail at containing the fire, or if the fire is developed when discovered,** (and remember that inasmuch as the plant is not provided with fire detection systems, it is likely that fires, when discovered, will be more developed than incipient) **the fire department should be called from the Anytown USA plant or by paging the appropriate ERT leader and asking him to contact 911. In other facilities, the call to 911 should be made directly by the person discovering the fire.** After calling, but before help arrives, personnel may continue in their attempts to control the fire, but only if doing so does not endanger themselves. Explosive or flammable materials in the vicinity of the fire may be moved to a safe place where they will be out of the reach of the flames, providing the action does not endanger the personnel. If the fire is widespread, it may be necessary for the personnel to move to safety, and the facilities may have to be evacuated as provided in section 3.2 or section 9.3.

An employee arriving at the plant when it is not staffed (e.g. during a callback) should immediately call 911, using phones at the facility if possible, or a nearby phone if the facility is involved in fire. For example, an employee called back to the Anytown USA plant after hours to respond to an alarm, upon noticing smoke or fire would determine by inspection whether the Operations Building (where phones are located) was involved. If not, the employee would phone 911 from the plant, and would then contact the ERT leader. Should the Operations Building be involved, the employee would call 911 and the ERT from an alternate location: the River Street Pump Station.

Damage to the facilities, if any, should be assessed as soon as possible after a fire. If a fire has affected the process of the plant or the functioning of a pump station, the New Hampshire DES/federal EPA should be informed of the extent of the damage and application made for an emergency discharge permit. Steps should be taken to provide interim treatment to the highest degree possible until complete repairs have returned the plant to its original treatment efficiency.

## **6.0 HURRICANES, HIGH WIND AND FLOODING**

### **6.1 FLOODING - STANDARD OPERATING PROCEDURE**

It is unlikely that a severe flood will have any direct effect on the wastewater facilities inasmuch as Anytown, and Whatyamacallit Rivers are regulated by dams, and the facilities are sited well above the flood elevations. The rainfall causing the flooding, however, might cause a hydraulic surge through the plant or pump stations. At the plant, it may be necessary to add a clarifier on line, change recirculation rates of the

RAS system, or reduce the air supply or even shut off the aeration system to prevent solids from washing out of the plant. The use of an off-line secondary clarifier is an effective means of reducing solids washout, one that has few or no potential negative effects; it should be considered whenever the plant's high flows are causing it to blow solids out. All of the pumping stations have considerable excess pumping capacity, and none should experience difficulty in high flow situations. There are several areas in the ANYTOWN USA interceptor sewer system where excess rainfall may be a concern: these areas are discussed in Section 9.6 of this document.

## **6.2 HIGH WINDS - STANDARD OPERATING PROCEDURE**

A greater direct hazard to the plant during such weather is the high wind associated with such storms. When high winds are anticipated, personnel should secure or pick up all outside objects which may become hazards during high winds, and lock all outside doors so that they do not open and sustain damage during high winds. All vehicles possible should be put inside buildings to prevent them from sustaining damage from flying debris.

High winds may result in loss of power or interruption of the ANYTOWN USA's supervised phone lines. The former consideration will result in standby power generators kicking into operation, and either condition will result in alarms being sounded and employee callbacks.

## **7.0 EARTHQUAKE**

### **7.1 GENERAL**

While not many would consider the surrounding area to be an earthquake prone area, in fact the whole of central New Hampshire is located in a seismic impact zone, defined as an area which has a 10 percent or greater probability that the horizontal ground level acceleration of the base rock in an area exceeds 10 percent of gravity once in 250 years. According to geotechnical experts, the question is not whether the region will suffer a serious earthquake, but when such a quake will occur.

### **7.2 DURING THE EARTHQUAKE**

**7.2.1 If already inside a building, DO NOT go outside the building unless the building poses a more dangerous situation.**

**7.2.2 Get under a sturdy desk, table, or door frame. Stay near the center of the building, away from glass doors and windows. STAY UNTIL THE SHAKING STOPS ENTIRELY.**

**7.2.3 If in the LAB - GET OUT!** The glass and chemicals pose a serious hazard. CLOSE the lab doors to contain any spilled chemicals and subsequent vapors. Go out to the corridor staying away from the glass windows and doors.

**7.2.4 IF ALREADY OUTSIDE:** Go to the nearest building and stand inside the door frame. Stay out of the building - the door frame will provide adequate protection without endangering you to potential problems inside the building.

**7.2.5 IF IN THE UNDERGROUND TUNNELS:** While the tunnel structure would probably be successful in resisting collapse during an earthquake, the overhead utilities in the tunnels represent a hazard, and should a pipeline break, these areas could represent a hazard from flooding or electrical dangers. Therefore, upon sensing an earthquake, an employee should exit the tunnels and stand inside the door frame of the entrance/exit.

#### **7.2.6 WHILE ATTEMPTING TO MOVE TO A SAFE BUILDING DOOR FRAME**

**a)** Watch for falling debris - most casualties during a quake result from falling materials.

**b)** Watch for downed or exposed electrical lines - assume all electrical lines are HOT and avoid them.

**c)** Watch for footing hazards, chemical spills or other hazardous situations and avoid them. Go to another area or go to an outside area that is barren of buildings, chemicals, electrical supplies, etc. (i.e., open ground between building and/or processes).

### **.3 AFTER THE SHAKING**

**7.3.1** If the quake has occurred during a period when the facilities are staffed and

have sustained structural damage, a head count as per 3.2.3 and 3.2.4 will be undertaken.

**7.3.2** If the quake was severe, it is important that detailed inspections of all facilities be undertaken to observe and document any evidence of damage resulting from the quake. The ANYTOWN USA holds earthquake insurance on the plant and pump stations, and damage caused by earthquakes must be reported to the insurer.

**7.3.3** Aftershocks may occur and can be as dangerous as the initial quake. Stay out of structures which appear to have been seriously weakened.

## **8.0 RELEASE OF SEWAGE - NOTIFICATION**

### **8.1 GENERAL**

While sewage, in a broad sense, may be considered an etiologic substance, releases of sewage or exceedences of the plant=s permit will not, in general, require SARA Title III reporting to the local EOC or the State Police Communications Center (SPCC). There may be exceptions to this general rule: for example, major and extended failure in a component of the ANYTOWN USA=s facilities resulting in prolonged discharge of untreated or partially-treated effluent to the Anytown River might be justification for contacting the SPCC, so that a coordinated response may be initiated for the benefit of downstream users of the receiving waters. But in general, such releases will be small, and will make no major impact on the receiving water or the uses

to which the water is being put, and accordingly, notification procedures when required can be more efficiently handled by the following in-plant procedures, without the participation of the SPCC.

State Law (RSA 248:3) stipulates that wastewater facilities which experience upset or bypass shall give immediate notice of the bypass or upset to all public or privately-owned water systems drawing water from the same receiving water and located within 20 miles downstream of the point of discharge.≡

There are no drinking water systems drawing from the Anytown River within 20 miles of the discharge location of the Anytown USA Treatment Plant, so this statute would not apply to upsets at the Anytown Treatment Plant.

The Anytown Water treatment Plant, however, does withdraw drinking water from Anytown Bay, and so any significant accidental discharge of wastewater to Lake Whatyamacallit or Anytown Bay from ANYTOWN USA facilities at Anytown Park Pump Station and all locations north (including Lady Cove, Trendy Beach and the Anytown Pump Stations on Lake Whatyamacallit) would require immediate phone notification to the Anytown Water Works, with written notification postmarked within 24 hours or the next business day.

In addition to these statutory requirements, the ANYTOWN USA will notify by phone and mail the health officer of any community in which untreated wastewater from a ANYTOWN USA pump station or interceptor is released to surface waters. Health officers for all ANYTOWN USA communities are listed in the Appendix A-2 in this Guide, which also contains the phone number of the Anytown Water Works.

Finally, accidental discharges of wastewater to surface water anywhere in the ANYTOWN USA system, or upsets at the Anytown Plant resulting in noncompliance with the plant's discharge permit required notification to both EPA and the DES-Water Quality Permits and Compliance Bureau. Appendix A-4 contains phone numbers and mailing addresses of these agencies.

## **8.2 REPORTING - STANDARD OPERATING PROCEDURE**

### **8.2.1 NPDES REPORTING**

**a)** As a condition of the ANYTOWN USA's NPDES permit, the following information must be orally (or electronically) reported to the EPA Permits Branch within 24 hours from the time we became aware of the incident, or the next working day:

- Any unanticipated Bypass≅ which causes a violation of any effluent limitation in the permit; or
- Any Aupset≅ which causes a violation of any effluent limitation in the permit; or
- Any violation of a maximum daily discharge limitation for any of the pollutants specifically listed in the permit

The EPA may waive the written report on a case-by-case basis if the oral report has been received within 24 hours or the next working day.

**b)** Except as provided above, written submission must also be provided within five (5) days of the time the Anytown USA becomes aware of the incident. The written submission will contain a description of the noncompliance and its cause; the period of

noncompliance, including exact date and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. Appendix C contains a suggested format for these non-compliance reports.

**c)** The oral and written reports of paragraphs **a** and **b** above must also be supplied to the DES Water Quality Permits and Compliance Bureau in Concord.

**d)** Phone numbers and addresses of EPA and DES contacts are provided in the Appendix A-4.

**8.2.2** Any major noncompliance event at the treatment plant that has the potential to result in discharges from the facility that may endanger health of downstream users of the river will be reported immediately to the health officers in the affected communities. (See listing of phone numbers and contact persons in Appendix A-2.) The notification will contain the information in the Template: ANOTIFICATION OF DISCHARGE VIOLATION≡ which is included in Appendix C. A copy of this notification will be sent by first-class mail to the health officers on the next business day following the violation.

**8.2.3** In the unlikely event that an upset or bypass at the Anytown Treatment Plant is so great or occurs for such an extended period that downstream users of the river might be affected, the State Police Communications Center (1-800-346-4009) should be used to facilitate the coordination of notification to downstream users. The information given to the SPCC should be similar to the information

required in 8.2.2.

**8.2.4** Any untreated (raw) wastewater discharges from ANYTOWN USA facilities to surface waters will be reported to the health officers of the community in which the discharge takes place as per the procedure discussed in 8.2.2.

**8.2.5** Any significant untreated (raw) wastewater discharges from ANYTOWN USA facilities to Lake Whatyamacallit or Anytown Bay will be reported immediately to the Anytown Water Works with written notification by first-class mail on the next business day using the format of Appendix C. The phone number of the Anytown Water Works is shown in Appendix A-2.

**8.2.6** Notifications to be provided under this section for the treatment plant, River Street Pump Station and the interceptor system from Rt. 1800 to the treatment plant will be undertaken by the plant's chief operator or his designate. Notification for discharges at all other pump station sites, and in the interceptor sewer system north and east of Route 1800 will be undertaken by the ANYTOWN USA's superintendent.

## **9. REMOTE ANYTOWN USA FACILITIES**

### **9.1 GENERAL**

While the potential for emergency response situations developing at the treatment plant is greater than at any other ANYTOWN USA location; there is nonetheless considerable potential for emergencies developing at the pump stations,

maintenance shop, and other facilities operated by the ANYTOWN USA. Such emergencies as fires and explosions, high wind, earthquakes, and sewage releases might all occur at remote facilities.

## **9.2 EMERGENCY RESPONSE TEAM - REMOTE LOCATIONS**

At all remote locations except for the River Street pump station, the Emergency Response Team command center will be at the Anytown Maintenance Shop, and the Emergency Response Team leader will be the shop=s maintenance manager. The River Street Pump Station, because of its proximity to the treatment plant, will utilize the Emergency Response Team at the Anytown Wastewater Treatment Plant. Section 2 lists the positions who comprise these two teams, and Appendix A-1 (ANYTOWN USA EMERGENCY MATRIX) contains the names and home phone numbers of the individuals currently holding these positions.

## **9.3 EMERGENCY EVACUATIONS - REMOTE LOCATIONS - STANDARD OPERATING PROCEDURE**

### **9.3.1 MAINTENANCE SHOP**

**a)** An emergency evacuation plan map is posted near the ARight-To-Know= area of the shop. This map identifies the emergency assembly area and the evacuation routes to be taken to safely leave the facility.

**b)** Personnel will be instructed to evacuate the shop via announcement on the shop=s P.A. system.

c) Employees evacuating the shop will meet at the emergency assembly area, in front of the greenhouse structures.

d) Supervisors will be responsible for headcounts of their subordinate staffs. Should a supervisor be unavailable, that supervisor's supervisor will assume this responsibility.

e) All personnel working in the shop will be accounted for at the assembly area immediately after the evacuation has been completed.

### **9.3.2 OTHER REMOTE LOCATIONS (PUMP STATIONS)**

a) Pumping stations are not staffed continuously, but only when maintenance or inspection of the facilities is being undertaken. With few exceptions, such activities involve small crews of two staff persons, minimum, and rarely greater than three or four.

b) In the event that a fire or explosion results in a need to evacuate a pumping station, the employees should immediately proceed to leave the station and assemble outside the station.

c) Supervisors will be responsible for head counts of their subordinate staff.

d) All personnel working at the station will be accounted for immediately after the evacuation has been completed.

## **9.4 ACCIDENTAL INJURY OR MEDICAL EMERGENCY - REMOTE LOCATION**

The procedures of Section 4 of this Guide will be followed for accidental injuries or medical emergencies at the maintenance shop, pump stations, or other locations.

Note that the 911 Emergency number is valid throughout the system and the state. **In an emergency, remember to give the dispatcher your name and the location and nature of the emergency as well as the number that the dispatcher would use to call you back.** Also, at the earliest opportunity, the Emergency Response Team leader should be contacted and appraised of the emergency.

#### **9.5 FIRE AND EXPLOSION - REMOTE LOCATIONS**

The procedures of Section 5 of this guide are applicable to ANYTOWN USA remote locations. **Emergency 911** will summon fire assistance to all ANYTOWN USA locations.

#### **9.6 HURRICANES, HIGH WIND AND FLOODING - REMOTE LOCATIONS**

The procedures to be employed for flooding and high wind which are presented in Sections 6.1 and 6.2 are applicable to all ANYTOWN USA facilities.

None of the pump stations nor the maintenance shop are in locations where flooding is likely to be a concern. But all of the stations may be affected by heavy rainfall, since excessive rain will affect groundwater and will cause infiltration into the sewer to increase, and thereby increase flows through most of the stations.

High rainfall may result in flooding in certain areas of the interceptor sewer if drainage structures in the railroad embankment (in which the interceptor is constructed) are unable to drain the upstream side of the embankment. Chronic trouble-spot areas include: the easterly shore of Whatyamaqcallit Lake, just North of Futile Road in North

Anytown, the embankment near Industry-T, and the areas in East Anytown off of Cross Road and near Sargent Street. These areas should be checked before heavy rains are expected in order to assure that the culverts are flowing properly. They should also be inspected after such storms inasmuch as the storm may have resulted in one or more of the drainage structures becoming blocked. It is the responsibility of the ANYTOWN USA=s chief operator to assign staff to make these pre-and post storm inspections for chronic trouble-spots South and West of Interstate 1800 and for the Industry-T and Gulf Brook Areas. The ANYTOWN USA=s mechanical maintenance manager has responsibility for assigning staff for locations North and East of the Industry-T drainage structure.

## **9.7 EARTHQUAKES - REMOTE LOCATIONS**

The procedures of Section 7 of this Guide are applicable in responding to earthquake emergencies at ANYTOWN USA remote locations.

Remember, that a serious earthquake may result in widespread power failure and phone line disruption, with attendant interruption of the alarm system and operation of standby generators. Attending to these issues will likely dominate staff activities in the time following an earthquake. As soon as these activities have been addressed, inspections of the interceptor routes should be undertaken to assure that no structural damage has occurred, and that the lines are intact.

## **9.8 RELEASE OF SEWAGE - REMOTE LOCATIONS**

The notification procedures of Section 8 of this Guide are applicable throughout the ANYTOWN USA system. Remember that any sewage spills, even minor ones, require that the ANYTOWN USA notify both the federal and state officials who monitor the plant's operating permit, and health officers from local community in which the spill took place. Health officers for all ANYTOWN USA communities are listed in the Appendix A-2. And any significant sewage spill into Lake Whatyamacallit requires that the Anytown Water Works be notified, as provided in Section 8.

## **10.0 SPILLS INTO THE ANYTOWN USA SYSTEM**

### **10.1 GENERAL**

Chemical spills from industrial plants and oil or gasoline spills from service stations and oil trucks are examples of possible sources of accidental or intentional spills that might find their way into the wastewater collection system. These materials have the potential of endangering employees, or of damaging the facilities. The danger of explosion is always a concern during such events. Additionally, the chemical, once discharged to a sewer, will ultimately arrive at the treatment plant where the material, in addition to these hazards, may be responsible for disrupting the treatment process, poisoning the sludge, or passing through the plant to the river, and being released to the environment.

The persons or industrial concerns responsible for the spill are legally and morally obligated to notify the plant whenever they or their industrial operations are

responsible for an unauthorized discharge to the sewer. The ANYTOWN USA's Industrial Pretreatment Program (IPP) has worked with the area's industries and with member municipalities so that there is a good likelihood that accidental discharges will be reported early-on during the emergency to IPP staff. It is essential that IPP staff, upon hearing of an unexpected discharge, immediately inform Anytown operations staff, so that in-plant measures to deal with the discharge may be promptly implemented. Should notice of the discharge be received not from the industry or other responsible party, but from ANYTOWN USA staff in North Anytown, or municipal officials, it is equally important that notification to the chief operator and his staff of the emergency be given first priority.

Remember that there is little in the way of early warning systems in the collection system to provide advance warning of mystery discharges. The pH meters located at the River Street and Whatyamacallit Stations, and at the headworks of the plant, have been less than totally reliable in operation, and in any case, even when functioning, they do not provide real-time alarms, but only records of when discharges having high or low pH occurred. (This information is useful in trying to track down where an unauthorized discharge may have originated, but not in providing advance or even timely notification of it). Also, as inspections of the stations have been reduced in frequency, early warning to the plant from ANYTOWN USA staff has become less likely.

## **10.2 ERT'S FOR CHEMICAL OR OTHER SPILLS TO THE ANYTOWN USA**

## **SYSTEM**

Inasmuch as the major focus in a mystery spill to the treatment plant is mobilization of treatment plant resources to mitigate the effects to the plant and the environment from such a spill, the ERT for such an emergency will be the team-designated in Section 2.3 as having responsibility for emergency management at the treatment plant. It is possible, for example, if a discharge of gasoline were to result in an explosion at a pumping station, that both ERT=s might be activated: the Aremote location≅ ERT to manage the pump station emergency, and the Atreatment plant≅ ERT to mitigate its effects at the plant.

### **10.3 SPILLS TO THE ANYTOWN USA SYSTEM - STANDARD OPERATING PROCEDURE**

**10.3.1** The ANYTOWN USA staff person, upon notification or discovering the spill should try to ascertain as much information as possible (and consistent with the notification procedure of 10.3.2) regarding the material spilled, quantity and location of spill etc., more completely described on the HAZARDOUS MATERIAL INCIDENT RESPONSE CHECK LIST, APPENDIX E.

**10.3.2** Immediate notification of the spill should be provided to the ERT at the Franklin Treatment Plant.

**10.3.3** The ERT leader will first notify the Anytown EOC (Fire Department) and then the State Police Communications Center (1-800-346-4009) which is responsible for notifying all appropriate state and local agencies of hazardous material spills 24 hours a day, 7 days a week. Calling the EOC/SPCC allows ERT members to focus on the immediate task of containing the spill and minimizing its effects. The ERT leader contacting the EOC/SPCC should provide the following information.

**a) Caller=s name, call back number**

**b) Nature of emergency i.e., oil spill, explosive material (gasoline), hazardous chemical. REMEMBER: that in the absence of information to the contrary, any unknown chemical should be regarded as hazardous.**

**c) Physical surroundings**

**d) Actions taken to stabilize incident**

**e) Extent of injuries**

**f) Extent of or threat to neighbors or the environment**

The SPCC will provide emergency notification to interested and affected parties according to the criteria of Appendices A and B (pps 23-24) of the New Hampshire Hazardous Materials Incident Emergency Response Plan. (Included as Appendix B of this Guide.)

**10.3.4** The plant=s chief operator and operations supervisor are key members of the plant=s ERT, and they should immediately initiate actions to protect the plant, its processes, the environment, and most of all, ANYTOWN USA staff. For unauthorized

spills, the major lines of defense that are possible include containing the spill in the collection system, or diverting and containing it once it has arrived at the plant. The existence at the plant of several empty process tanks provides an opportunity to isolate and contain a spill of limited duration. For example, an off-line primary clarifier can store the plant's average flow of 5.0 million gallons per day for 3.75 hours. The two unused aeration tanks together provide another 7.15 hours. Together, these unused facilities could contain the spill - i.e. prevent it from entering the biological portion of the plant or from being discharged to the river - for more than 10 hours at the plant average flow. An off-line secondary clarifier would add an additional 4.85 hours.

**10.3.5** ERT members should direct staff to protect ANYTOWN USA facilities and the environment as follows:

**a) Oil Spills –**

1. **Remote** - Attempt to isolate and contain the spill. For example, an oil spill in the collection system that has not reached the treatment plant may possibly be contained using absorbent pads, booms, decanting etc. Oil entering wet wells may be contained by limiting pump wet well draw down and pumping the oil from the wet well to a container. This would be handled on an emergency basis through a New Hampshire DES HAZMAT outside contractor such as Clean Harbors, Inc. The Aplant's ERT will need to coordinate its response - and should enlist the assistance of the Aremote location's ERT in this effort. Also, calls to the local EOC (see Appendix A-2) and the State Police communications center (1-800-346-4009) should be made.

If the oil spill reaches the treatment plant, the flow should be diverted to an empty primary clarifier, if available, to protect the process and prevent discharge to the river. This action will provide three-to-eight (3-8) hours of time (depending on flow) during which time decisions can be made about utilizing additional off-line tankage for additional isolation of the flow, and the use of such techniques as booms, absorbent materials, etc. The goal should be to protect the process, and to prevent release of the chemical to the River. These goals are not inconsistent with each other.

2. **Locally (at any ANYTOWN USA facility)** – Attempt to isolate and contain the spill using whatever means are available to prevent material from entering a floor drain. For example, a small oil spill that has occurred in the treatment plant's wash bay area has not reached the bay 's floor drains may possibly be contained using absorbent pads, "socks", etc. Once containment is in place, clean up the affected spill area using the absorbent pads (located on top of the maintenance oil storage cabinet) and then dispose of the oily pads into the yellow 'oily waste can' located in the shop.

If a larger spill occurred, the potential for it to reach the floor drain is evident. Immediately place the NEW PIG-Drain Blockers™ (located on top of the maintenance oil storage cabinet) over each of the floor drains to prevent the oil from entering the floor drain traps and ultimately the Operations Building drain pump system. Once containment is in place, clean up the affected spill area using the absorbent pads, booms, etc. and then dispose of the oily items into the yellow 'oily waste can'. If a quantity of oil did enter the floor drain system prior to setting the Drain Blockers in place, see to it that the OB drain pump system is off, (you should probably enlist the plant ERT

leader or a co-worker to help with these tasks), and cease pressing on any other operations (including bathroom and laboratory water use) which would flow to the OB drain. Contact the Anytown Public Works to ask for its vector to come to Anytown Treatment Plant to remove the oil from the O.B. drains. Then remove the material on the floor and clean up the floor area before the drain blockers are removed. Following the clean up of the floor, remove the blockers and brass wire grate off the floor drain(s) and by using a pump or vacuum system, remove the oil-laden water from the floor drain traps. Dispose of this waste into an oil disposal drum. After the traps have been cleaned out, add water to the traps in order to create a water seal and prevent the release of sewer gases into the area. Clean the drain blockers (follow the cleaning procedure specified on the package by the manufacturer) before returning them to their storage pouch. If the ERT leader has not been involved in the incident, report the incident to the “plant” ERT leader in order to determine what further steps/actions, if any, are required.

**b) Explosive Material** - In order to protect facilities, it may be necessary to shut down various equipment. This decision will be made by the plant superintendent or chief operator and/or the Anytown Fire Department. Evacuate all ANYTOWN USA personnel from explosive areas. Isolate the flow off-line. Cooperate with Anytown Fire Department, State Fire Marshall, and NH DES HAZMAT team.

**c) Hazardous Chemicals** - Take precautions that may be possible to protect plant process and equipment. (Isolate flow off-line as discussed above.)

Evacuate personnel from vulnerable areas until the nature of the hazardous

chemical is determined.

Cooperate with Anytown Fire Department, and New Hampshire DES HAZMAT team.

## **11.0 TRAINING AND FOLLOW UP**

### **11.1 PRE EMERGENCY TRAINING**

**11.1.1** It is the Town's policy that all ANYTOWN USA personnel be trained in the contents of this Emergency Response Plan. All training shall be documented by employee signature on a training session attendance form, which will be kept by the Plant Safety Officer and the ANYTOWN USA's secretary. Refresher training will be conducted on an annual basis, and documented as indicated above. New employees shall be trained in the contents of this Emergency Response Plan during the first week of employment.

**11.1.2** The ANYTOWN USA administers several health and safety programs such as Confined Space Training, Hearing Conservation, Hazardous Communications, etc. The requirements and documentation of each of these programs are maintained by the Plant Safety Officer and are not included in this Emergency Response Plan.

**11.1.3** CPR training, certification, and renewal of certification is encouraged but is not required for all staff. Training will be scheduled so that staff wishing to do so may

maintain their certification (every other year training).

## **11.2 POST EMERGENCY FOLLOW-UP**

Following an actual emergency which has required an Emergency Response Team to be engaged, an evaluation of the response process will be made by those who have participated in the response. Issues which will be considered in this evaluation will include: 1) Did the ERT function as a real team, 2) were staff promptly notified and effectively managed, 3) were all the notifications given as required, and 4) did this Emergency Response Plan provide insight into the emergency that aided in its management. Suggestions to improve the response should be brainstormed. A brief report with conclusions and recommendations should be coordinated by the ERT leader and prepared within two (2) weeks of the event. This guide will be revised as necessary to accommodate any such recommendations.