



PERMIT NO. ALS000032

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# Spill Prevention & Response

*Permit Part II B.6.*



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# SPILL PREVENTION & RESPONSE

## PERMIT PART II B.6.

The primary purpose of this program is to prevent, contain, and respond to spill occurrences that have the potential to discharge into the City's MS4. The City has implemented this program in compliance with the requirements of its National Pollutant Discharge Elimination System (NPDES) permit, including development of a hotline for reporting spills, identifying response staff roles and responsibilities and providing spill reporting information on the City's Stormwater Management website. This document details the City's procedures for spill prevention and spill response.

### Reporting Protocols:

- ❖ Emergency
  - Dial 911
- ❖ Non-Emergency
  - Dial 311
- ❖ Jefferson Co. EMA
  - (205) 254-2039
- ❖ Shelby Co. EMA
  - (205) 669-3999
- ❖ ADEM
  - (205) 942-6168

## SPILL PREVENTION AND RESPONSE PROGRAM SUMMARY

In accordance with the City's National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit, issued on March 1, 2018, the City is required to develop or revise and a program to prevent, contain, and respond to spills that may discharge into the City's MS4. The program shall include at a minimum, the following elements:

- ✓ Investigate, respond, and conduct response actions or coordinate with other agencies that may provide response actions
- ✓ Develop a mechanism to track spills, response, and cleanup activities for all spills
- ✓ Use GIS to identify spill locations, locations for inspections, and chronic problem areas
- ✓ Implement a spill prevention and response plan
- ✓ Provide training of appropriate personnel in spill and response procedures and techniques to mitigate pollutant discharges from spills to the MS4
- ✓ Establish procedures to ensure that all spills are able to be promptly reported to appropriate authorities

### ***SPILL PREVENTION AND SPILL RESPONSE PLAN:***

The Birmingham Fire Department (BFD) conducts Pre-Fire Surveys (Protocol provided in Exhibit A) at facilities that are included in the SARA Title III, Tier II program. The Fire Department performs a walk-through of each site to identify where hazardous materials are stored and then develop a plan to prevent the release of hazardous materials during an emergency. The Birmingham Fire Department also conducts fire inspections at a number of industrial facilities within the City of Birmingham to assess fire prevention and hazardous materials storage procedures. As a part of these comprehensive inspections, the spill



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prevention, control and countermeasure (SPCC) and storm water pollution prevention (SWPP) plans of those facilities are reviewed as well as any NPDES storm water permits issued by ADEM. The Fire Inspection Reports are provided in Exhibit B. Currently the SPCC and SWPP plans for City facilities are being reviewed and revised to comply with the requirements of the MS4 permit. The facilities that are included in this review are the Sixth Avenue Municipal Complex and the fueling stations listed in the Table 1-1 below.

**TABLE 1-1 Fuel Site Locations**

Site	Address	Fuel Type
Southside – Site #11	515 6 <sup>th</sup> Avenue South	Unleaded and Diesel
Downtown – Site #12	1700 1 <sup>st</sup> Avenue North	Unleaded
North – Site #13	2413 27 <sup>th</sup> Street North	Unleaded and Diesel
East – Site #14	301 96 <sup>th</sup> Street North	Unleaded and Diesel
Ensley – Site #15	1044 Avenue W	Unleaded and Diesel
Legion Field – Site #16	800 Graymont Avenue	Unleaded
5 Points West – Site #17	2200 Avenue W Ensley	Unleaded and Diesel
New Georgia – Site #18	2500 47 <sup>th</sup> Avenue North	Diesel
Eastern Area	2787 Alton Road	Diesel
Botanical Gardens	2612 Lane Park Road	Unleaded

Spills are reported in various ways and because of such there is a need to document how various spill types are handled. In all cases, the Birmingham Fire and Rescue Department (BFD) has primary responsibility for responding to spills that occur in the City limits. The Birmingham Fire Department is dispatched to contain the spill in order to prevent any threats to human health and life. Protocol for Spill Responses are provided in Exhibit C. As necessary, the BFD coordinates its efforts with the Jefferson County Emergency Management Agency (JCEMA) as well as with pertinent city staff for both hazardous and non-hazardous spills. When spills that may directly or indirectly impact the receiving waters occur, the staff responsible for the management of the stormwater program is alerted to direct any and all necessary stormwater related field response work. When a spill is reported, the City staff will assess the situation with concern to the City's MS4 and receiving water pollution. The Fire Department prepares incident reports and those reports are forwarded to the JCEMA. Spill response and clean up reports shall also be requested from ADEM, by City Stormwater Management staff. Birmingham Fire Department is responsible for maintain a record of tracking all spills that occur within the city limits.

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***TRAINING PROGRAM ELEMENT:***

The training division is responsible for providing monthly training assignments through the Training Calendar issued at least one week before the beginning of each month. The training calendar shall specify all necessary information for personnel for the scheduling of the assigned drills including makeup requirements. There is also a comprehensive program of on-going training for Haz-Mat team members. All are trained at the HAZWOPER Technician level and each team member attends the annual refreshers necessary to maintain this level of training.

**CONCLUSIONS*****Section Contributors:***

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***Program Strengths:***

The high caliber of the Haz-Mat team personnel and the high level of training are strengths of the City's spill response capability.

***Future Direction:***

Stormwater staff will develop and deliver a training program for in house personnel to respond to spills, as well as, preventing spills.

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# Exhibit A

## Pre-Survey Protocol

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# Exhibit B

## Pre-Fire Survey Form



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# Exhibit C

## Spill Response Protocol