



ADMINISTRATIVE DIRECTIVE

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I. **PURPOSE**

To describe the City of Tucson (City) Environmental Management Program's (EMP) policy and procedures:

- To provide the accurate, timely conveyance of information regarding environmental incidents to Mayor and Council, and the City Manager so they may communicate effectively with the public, media and city staff.
- To establish a policy that will provide minimum standards for City operations; clarifying roles, responsibilities, and enabling departments to effectively address environmental incidents and related subsequent remediation activities.

II. **POLICY**

The City's established environmental policy is to conduct its operations in an environmentally responsible and sustainable manner; to comply with Federal, State, and local environmental laws and regulations; to reduce its use of natural resources; limit the generation of waste; and to lead the community by example (see Appendix A). The EMP Governing Board, EMP Coordinator and Environmental Services (ES) Director/Deputy Director with assistance from all other City departments will implement the City's EMP.

In the event of an environmental incident which has real or perceived impacts on human health or the environment, the EMP Coordinator or ES Director/Deputy Director shall adhere to National Incident Management System (NIMS) guidance to provide timely notification of the incident to the City Manager's Office, Chief Information Officer, Mayor and Council, and affected City departments. This policy shall be implemented when an environmental incident exceeds the scope of the City's existing Spill Response Plan as defined in the City's Hazardous Communication Program (S-020). EMP procedures shall comply with the policies established by the City's Office of Emergency Management and Homeland Security (TOEMHS).

III. **DEFINITIONS**

- A. **Environmental Incident** - An event occurring within City limits, or on City owned property, or in the metropolitan area, whether caused by City personnel or others, resulting in an interruption or possible cessation of routine City operations and that has the potential to affect the environment, public health, safety, and the public's confidence in the City's management of such incident. This includes possible non-emergency environmental impacts to the air, soil, groundwater and/or surface water. City owned property includes any real estate, material or equipment operated by, leased or owned by the City.



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- B. **Emergency Incident** - An event occurring within City limits, or on City owned property, or in the metropolitan area, whether man-made or natural, resulting in an interruption or possible cessation of routine City operations that has the potential to affect human health, safety, property, and/or the environment. City owned property includes any real estate, material, or equipment operated by, leased, or owned by the City.

- C. **Environmental Management Program (EMP)** - The consistent application of environmental laws, rules, and regulations throughout the City to safeguard human health, and the environment. A committee of directors, deputy directors, or their designees from all key departments meets quarterly to review environmental issues and ensure departmental compliance with environmental requirements.

- D. **EMP Governing Board** - A subcommittee chaired by the ES Deputy Director, (and/or EMP Coordinator) that is given the responsibility of setting the EMP policy, reviewing incidents, providing revisions and recommendations to the EMP policy, providing training, and managing coordination of environmental issues. The governing board meets monthly, or more often if necessary, and includes staff from the following departments:
 - Environmental Services
 - Water
 - Transportation
 - Human Resources - Central Safety Services
 - Fire
 - City Attorney
 - Tucson Office of Emergency Management and Homeland Security

IV. GENERAL

- A. If the environmental incident is part of an emergency event with an **Incident Command System (ICS)** established [as defined by the **NIMS**]; the dissemination of information and notification process will follow the procedures specified by the City's public information network.

- B. All other environmental incidents shall be reported to the EMP Coordinator or ES Deputy Director (**Office 791-5414 or Cell 403-0295**) **within two (2) hours** of any City departmental/staff awareness of the event. All notifications made/referenced shall initially be **verbal** either in person or by phone, and followed up in written format via email within 24 hours. The EMP Coordinator or ES Deputy Director is responsible for the **initial** notification to the Mayor and Council, City Manager and the City's Chief Information Officer.



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- C. This Administrative Directive has a widespread impact on City operations; therefore:
- Supervisors shall maintain a working knowledge of this directive.
 - All employees are responsible for reviewing, understanding and complying with this directive. This procedure shall be followed for all environmental incidents. (See Incident Notification Procedure flow chart - attached.)

V. **RESPONSIBILITIES**

A. **DEPARTMENT RESPONSIBILITY:**

1. **IF THE SITUATION IS AN EMERGENCY OR LIFE THREATENING; EMPLOYEE/WITNESS SHALL CONTACT 9-1-1 (if within the city's phone network contact 9-9-1-1).**
2. Employee/witness shall notify their immediate supervisor of incident.
3. The supervisor shall notify their department director, deputy director, and emergency management coordinator, following appropriate departmental procedures.
4. The department director/deputy director or emergency management coordinator shall notify the EMP Coordinator (**Office 837-3710, Cell 403-0295**), or the ES Deputy Director at 791-5414 within 2 hours. (**Off-hours call City Communications at 791-4144.**) Notification shall include all details regarding the incident known at the time.

B. **ENVIRONMENTAL MANAGEMENT PROGRAM and ENVIRONMENTAL SERVICES DEPARTMENT RESPONSIBILITY:**

1. When the environmental incident is part of an emergency event, upon notification, the EMP Coordinator or ES Deputy Director will respond as necessary to the incident as a technical advisor to the Incident Commander under NIMS procedures following standard ICS protocols.
2. When the environmental incident is not part of an emergency event, the EMP Coordinator or ES Deputy Director shall:
 - Return the call from the notifying department and/or respond on-site within two (2) hours of notification.
 - Evaluate the situation for potential City involvement and determine if the incident meets the criteria defined above in Section III. A.



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3. If the incident meets the definition, the EMP Coordinator and/or the ES Deputy Director shall:
 - Report the incident to the Mayor and Council, City Manager and City's Chief Information Officer within two (2) hours of initial report.
 - Contact other impacted City departments as necessary to address incident concerns.
 - Notify the EMP Governing Board within two (2) hours of department notification.
 - After the incident has stabilized, the EMP shall coordinate environmental remediation or clean up activities between impacted City departments, regulatory agencies, contractors, subcontractors, or involved private-sector entities.

D. FOLLOW-UP NOTIFICATION PROCEDURES:

Affected departments shall adhere to the following regarding notification:

1. If the environmental incident is part of an emergency, the on-scene public information officer, or representative from the Joint Information Center will coordinate and disseminate all public information releases, and notifications within the City's chain of command.
2. If the environmental incident is **not** part of an emergency, the affected departments and the **EMP Coordinator or ES Deputy Director** will continue to coordinate and disseminate information within the City's departments, regulatory agencies, contractors or subcontractors.
3. The affected department is responsible for notifying the EMP Coordinator or the ES Deputy Director of changes to environmental concerns and conditions regarding the incident and their department.
4. Once the incident has stabilized, and can be addressed by the affected department's standard operating procedures, communications will be the responsibility of the affected department's public information officer.

E. RECORD KEEPING:

Affected departments shall keep written records of environmental incidents for 25 years or longer as required by statute.



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Attachments

- A - City EMP Policy Statement
- B - EMP Incident Notification Procedure Flow Chart

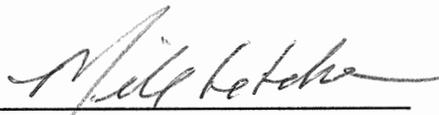
References

Central Safety Services: Hazardous Communication Program (S-020) – Appendix H: Hazardous/Spill Response Program.
 (<http://intranet.ci.tucson.az.us/css/other/spill/sld001.htm>)
 National Incident Management System (NIMS)
 Tucson Office of Emergency Management and Homeland Security (TOEMHS)

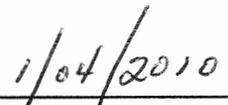
Review Responsibility and Frequency

The Environmental Services Director or Deputy Director and the Environmental Management Program Coordinator shall review this directive annually.

Authorized



 City Manager



 Date

City of Tucson Environmental Management Program Policy Statement

The City of Tucson is committed to protecting human health and the environment; meeting or exceeding Federal, State, and local laws, regulations, codes, and guidelines; and employing sustainable pollution prevention practices. The City will minimize environmental impacts and continually improve environmental performance by:

- Maintaining a policy of commitment to environmental excellence.
- Considering environmental impacts when making policy, planning, purchasing, and operating decisions.
- Identifying and complying with pertinent requirements in Federal, State, and local laws and regulations.
- Requesting the necessary resources to successfully carry out goals, meet objectives, and targets.
- Educating City staff of their environmental roles and responsibilities, providing appropriate training, and holding employees accountable for their performance and actions, including recognizing them for outstanding performance.
- Effectively communicating environmental issues with employees and the general public, while soliciting their input in developing and achieving goals and objectives.
- Routinely monitoring environmental operations and conducting periodic, inspections, and reviews to ascertain that applicable standards are being met, and that programs are effective.
- Correcting identified deficiencies in a timely manner and taking appropriate steps to prevent their recurrence.
- Developing annual goals, objectives, and targets to advance program performance in terms of both regulated and unregulated impacts.



**City of Tucson Environmental Management Program
Incident Notification Procedure**

Attachment B
A.D. 8.01-1

