

Desecheo Operational Plan

Bait Spill Protocol

The purpose of this document is to describe the actions that will be taken if a spill of bait occurs during rat eradication activities for the Desecheo Island Restoration Project, which takes place within the Desecheo National Wildlife Refuge (NWR). **Human safety takes precedence over all response activities.** The Material Safety Data Sheet for Brodifacoum 25W & 25D Conservation must be attached to this document for handling and management in case of an accidental release.

The objectives of the Bait Spill Response Plan are to:

- Ensure the safety of personnel and resource users
- Control the source of the spill
- Contain and recover spilled material
- Inform partners and agencies with jurisdiction

This response plan is divided into two sections:

- (1) General response plan procedures
- (2) Flow chart defining the organizations that are to be informed in each spill event.

1. General Response Procedures

Human Safety is the primary concern in any emergency. Before any action evaluate the scene to ensure it is safe for personnel to enter. Take all necessary precautions for human safety. Refer Flow chart (Fig 1) below.

Minor Spill on Mainland Puerto Rico or Desecheo

If the amount of spilled bait is small on mainland Puerto Rico and/or Desecheo, and can be cleaned up safely and quickly, then the following procedures should be followed:

1. Notify Site Controller (External Loads) or Air Ops Supervisor (Bait Application).
2. Retrieve the bait spill kit and initiate clean up and recovery of material.
3. Sweep up spilled material immediately and place in properly labeled container for disposal or re-use.
4. Collect spillage without creating dust.(all personnel to wear appropriate PPE)
5. Wash contaminated surfaces with water

Large spill on Desecheo

If the amount of spilled bait is large on Desecheo and cannot be quickly and easily cleaned up with a reasonable amount of effort, then the following procedures may be followed, based in the Safety Data Sheet (SDS) for Brodifacoum 25W & 25D Conservation.

1. Inform the Operation Sections Chief and Incident Commander
2. Evaluate the scene and make sure the area is safe for people to enter. Take all necessary precautions for human safety. If necessary stop helicopter operations until the spill is cleaned up.
3. Determine if any personnel are injured and take appropriate steps to assist individual(s) if it can be done safely (refer to *Injured Persons Action Plan: on-island (Desecheo island)* and *Injured Persons Action Plan: off-island*).
4. Consult with the pilot the location of spill (GPS coordinates if available)
5. Retrieve industrial strength garbage bags from the Bait Spill Kit and personnel assigned will arrived to the spill area and start the clean up. All personnel to wear appropriate PPE.
6. Once the spilled bait is picked up, the bags will be transported in an external load to a suitable area for additional containment.

Spill into the Marine Environment

1. If bait is spilled into the marine environment, the Operations Section Chief must inform the Incident Commander; the Incident Commander will authorize an appropriate response procedure (see Section 2 Flow Chart). If the spill involves a helicopter incident – safety of the pilot is paramount.

Large spill on Mainland Puerto Rico

In the event of a large spill on mainland Puerto Rico, the Incident Commander will be responsible for disseminating information to, and coordinating with, the appropriate response agencies and available project staff. Information required will include:

- Any personnel injuries and if emergency medical assistance is required
 - Time and location of spill (GPS coordinates if available)
 - Approximate amount of bait that spilled
 - Any actions taken to date.
 - Equipment available and where located
1. Control the source of the spill by containing un-spilled bait in existing container, or transfer to a reliable vessel to prevent further spillage. Appropriate Personal Protective Equipment (PPE) should be worn when handling the bait. Dispose of all wastes in accordance with all local, regional and national regulations or following the SDS measures.
 2. Place spilled material into labeled receptacle. Do not allow bait to enter drains or water courses. Where there is contamination of streams, rivers or lakes contact the appropriate environment agency (see Section 2 – Flow Chart).

Bait Spill Response Kit Contents

One Bait spill response kit will be available at each operational bases at PREPA Bonus Plant for the external loads and on Desecheo Island for the bait loading base. A bait spill response kit will be provided to the bait transporting company as requested.

Marine Spill:

- 1 box industrial strength garbage bags and ties (X gallon)
- 1 box nitrile gloves (size XL to accommodate all hand sizes)
- 1 box labels
- 2 Sharpie
- 1 storage bin (for supplies)
- 3 medium hand nets
- 1 garbage bin or 4 plastic buckets (5gl)
- 1 laminated copy of the bait label for PPE and disposal references (Include English and Spanish)

Terrestrial Spill:

- 3 brooms
- 3 dust pans
- 4 shovels
- 1 box industrial strength garbage bags & ties
- 1 box labels
- 2 Sharpies
- 1 Storage bin (for supplies)
- 1 garbage bin or 4 plastic buckets (5gl)
- 1 laminated copy of the bait label for PPE and disposal references (Include English and Spanish)

Personal Protective Equipment:

- 6 eye wash bottles
- 2 emergency showers
- 1 box of particle size dust masks
- 1 box nitrile gloves (Size XL to accommodate all hand sizes)
- 4 pair long-sleeved shirts and long trousers
- 4 safety goggles

2. Agency and personnel contacts in the event of an unplanned bait spill.

