

**CHAPTER II                      Operations**  
**SUBJECT 1                     Call Out and Investigations**  
**TOPIC 1                        Environmental Crimes Unit**

**A.      OBJECTIVE**

1.      To establish guideline and procedures to be used by company officers, and chief officers when requesting an investigation by the Environmental Crimes Unit (ECU).

**B.      POLICY**

1.      The ECU protects the City of Cincinnati from the financial responsibility associated with remediation of hazardous materials releases, spills, or discharges. The investigators enforce state laws which hold the owner or shipper of the hazardous material financially responsible for the cost of remediation and emergency response. The City of Cincinnati intends to seek restitution for funds expended in the remediation of hazardous materials/hazardous waste responses by city agencies. To this end the ECU has been established within the Cincinnati Fire Department (CFD).

**C.      DUTIES OF THE INCIDENT COMMANDER (I.C.)**

1.      In any situation where the CFD has responded in emergency or nonemergency mode, a determination will be made by the incident commander as to whether a possible or potential environmental crime has occurred at the site. Evidence of such crime might be leaking or damaged barrels, heavy ground staining, abandon drums of hazardous waste or indications of chemical mishandling.
2.      Should a determination be made by the incident commander that a possible environmental crime exists; the I.C. will notify the ECU through fire dispatch. Fire dispatch will contact ECU and advise the investigator of the fire ground and/or phone number to contacting the I.C.
3.      After regular business hours the Incident Commander shall contact fire dispatch which will notify the incident commander of the availability of an ECU investigator. Any radio messages concerning ECU should use the term, "ECU or request that ECU should respond". Should no investigator be available and immediate remediation is not required, the I.C. shall take all necessary

information and submit all reports as usual. The I.C. shall notify the ECU office at 357-7533 on the next business day for follow up investigation.

4. If the original response was initiated by a report of fire, explosion, medical or other emergency and an environmental crime has been revealed; the I.C. will remain on the scene or will assign someone to remain on the scene until the arrival of an ECU investigator. This will help facilitate the investigation, by maintaining control and custody of the scene.
5. The I.C. shall request an ECU investigator on all responses where a hazardous material or hazardous waste has been spilled, leaked or released to the environment in a quantity sufficient to present hazard to the environment, persons or property. This will be a judgment call by the I.C. If in doubt, notify the ECU.
6. The I.C. shall also request an ECU investigator for any abandon drum containing hazardous waste discarded on City or publicly owned property. The Ohio EPA no longer offers the Orphan Drum Program which previously assisted in the remediation of abandon drums.
7. It is the policy of the ECU to have two investigators at any interview/interrogation situation. Should only one ECU investigator be available for an urgent interview/interrogation, the investigator may request that the Fire Investigation Unit Specialist on call respond to assist. That request will be granted unless it would conflict with an ongoing fire investigation.