

ATTACHMENT G
CONTINGENCY PLAN
[270.A (270.14(b)(7))]

SECTION G
CONTINGENCY PLAN

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G CONTINGENCY PLAN

This section of the RCRA Part B permit application has been prepared to fulfill the requirements of A.A.C. R18-8-270.A and 264.A (40 CFR 264.52 and 270.14(b)(7)). This contingency plan consists of implementation and response procedures to be initiated in the case of an emergency. All employees are thoroughly familiar with the contents and trained in evacuation procedures detailed in this contingency plan.

G.1 GENERAL INFORMATION

This Contingency Plan is developed for Clean Harbors Arizona, LLC (Clean Harbors), located at 1340 West Lincoln Street, Phoenix, Arizona, 85007 (the northeast corner of 15th Avenue and Lincoln Street). The primary activities at this site are the consolidation of household and industrial type wastes into containers or tanks and the storage of containers of the same types of wastes. Wastes are shipped to recycling facilities or final disposal sites as full truckload quantities are accumulated on site.

RCRA and non-RCRA regulated hazardous wastes are stored or consolidated at various locations throughout the facility. These locations consist of a tank storage area for bulk liquids and various container storage areas that contain drummed waste. If hazardous waste management units are added, retrofitted, or changed, the contingency plan will be revised to reflect these changes.

Although numerous EPA waste-codes are accepted at the Clean Harbors facility, the general categories of waste stored are:

- (1) Flammable hydrocarbons
- (2) Paints
- (3) Batteries
- (4) Acids, bases, and oxidizers.

Exhibit G-1 provides the location of each storage area and the materials stored.

The Contingency Plan will be reviewed and immediately amended, if necessary, when:

- (1) The facility permit is revised;
- (2) The plan fails in an emergency;
- (3) The facility changes its design, construction, operation, maintenance or other circumstances that potentially increase the potential for fires, explosions or releases of hazardous waste constituents or changes the response necessary in an emergency;
- (4) The list of emergency coordinators changes.
- (5) The list of emergency equipment changes.

Copies of Clean Harbors' Contingency Plan are maintained and stored in the offices of the emergency coordinators. In addition, copies have been provided to the local police department, fire department, Arizona Department of Environmental Quality, Poison Control at Good Samaritan Hospital, Phoenix Memorial Hospital, Local Emergency Planning Committee, and the Department of Emergency Services.

G.2 EMERGENCY COORDINATORS

The list of emergency response contacts is summarized in Exhibit G-2 at the end of this document.

THE PHONE NUMBER OF THE CLEAN HARBORS FACILITY IS: (602) 258-6155

At all times at least one of these employees are either on-site or on-call. The emergency coordinators are ultimately responsible for all response actions implemented. Each emergency coordinator is thoroughly familiar with all aspects of the facility's contingency plan, with all operations and activities at the facility, the location and characteristic of waste handled, the location of all records within the facility, and the facility layout. In addition, the emergency coordinator or any alternate coordinators have the authority to commit the resources needed to carry out the contingency plan.

G.3 IMPLEMENTATION

The Contingency Plan is designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or surface waters. The provisions of the plan must be carried out immediately whenever there is an imminent or actual incident involving fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

The Contingency Plan may be implemented when one or more of the following conditions exist:

- (1) Fire and/or Explosion
 - (a) any fire which cannot be controlled by plant equipment;
 - (b) if an imminent danger exists where an explosion could occur causing a safety hazard because of flying fragments or shock waves;
 - (c) if an imminent danger exists that an explosion could result in the release of toxic material;
 - (d) if an imminent danger exists that could ignite other hazardous waste at the facility.

- (2) Spill or Material Release
 - (a) a spill which could result in the release of flammable liquid or vapor thus causing a potential fire or gas explosion;
 - (b) a spill that could cause the release of toxic liquids or fumes;
 - (c) a spill that can not be contained on-site, posing a threat to off-site features.

All personnel have emergency and contingency plan training. In addition, further emergency training has been provided to personnel who have been assigned to the hazardous waste management areas. Therefore, if there is an imminent or actual incident involving fire, explosion,

or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment, personnel have been trained to immediately assess the situation and act accordingly (i.e. fire prevention, spill control, etc.). Control measures will be implemented as long as the personal health and safety of site personnel are not endangered. If it is determined that additional support is needed or if the immediate personnel are unable to handle the situation, the emergency coordinator will be notified.

G.4 EMERGENCY RESPONSE PROCEDURES

G.4.1 Notification

The facility is equipped with a warning alarm system to notify the emergency coordinator as well as the entire facility that a fire or other extreme emergency has occurred. The alarm warning centers, which include strobes and horns, are located throughout the facility and can be easily observed from any location on site. The alarm pull stations are positioned in easily accessible locations throughout the facility. The alarm system is a dual system with separate pull stations for fire and hazardous materials incidents. The red fire pulls activate the white strobe lights at the warning centers and a "tempura" sound is emitted from the horns. The yellow hazardous materials incident pull stations activate the yellow strobe lights at the warning centers and a constant tone is emitted from the horns. All employees are trained in the activation process of the pull stations and the sound of each tone. The alarm is electrically operated and is equipped with a battery back-up to ensure operation during power outage.

In addition to the alarm, the internal telephone system and public address system (PA) can be used to notify employees regarding the nature of any emergency and the recommended plan of action. Total plant evacuation is initiated by the activation of any alarm pull station. Exhibit G-3 is a diagram indicating the evacuation routes.

In the event of an emergency situation, the emergency coordinator will notify all employees by alarm, public address system, or phone. Upon hearing the warning signal, facility personnel have been trained to initiate their designated responsibilities (e.g., equipment shutdown, close containers,

etc.) and to evacuate the facility by going to a pre-designated area to assist the emergency coordinator. The emergency coordinator will notify all federal, state and local agencies as required or needed, by phone initially and by letter, as required. Exhibit G-2 is a list of emergency response contacts.

G.4.2 Identification of Hazardous Materials

The emergency coordinator will immediately identify the character, exact source, amount and extent of the release. The initial identification method may consist of physical (color, odor, appearance) and visual (location, source) descriptions of the material released. The emergency coordinator, or his designee, may inquire to individuals that were handling the specific waste at the time of the incident or who may have been working in the area at the time. Other means may be available for identification including the type of container, the Clean Harbors' tracking number, the company generating the waste, the manifest, and or the profile of the waste. The types of organic materials handled at the facility (aliphatics, aromatics, alcohols and/or ketone solvents) lend themselves to easy physical and visual identification. In addition, waste materials are stored in specific areas that aid in the identification of the general type material released. If, for some reason, the released material cannot be readily identified, samples will be taken for chemical analysis.

G.4.3 Hazard Assessment

The emergency coordinator will determine the actions needed to contain or control any emergency. The policy at Clean Harbors is to protect human life first, then the environment and, finally, the plant equipment. Upon identifying the type of waste, the emergency coordinator will assess the situation for potential hazards. Such hazards could include irritating, toxic, or asphyxiating gases being generated from the incident or the flow of liquids from the facility. If the emergency coordinator determines that the facility has had a release, fire or explosion which could threaten human health or the environment outside the facility, then he/she will proceed with the appropriate actions called for in this Contingency Plan.

G.4.4 Control Procedures

G.4.4.1 Fire and/or Explosion

The following steps will be taken if an uncontrolled fire and/or explosion occurs:

- (1) All activity on the site will be immediately halted.
- (2) All personnel not directly involved in containing the fire will be notified by the alarm system and evacuated from the facility.
- (3) The emergency coordinator or designee, will notify the City of Phoenix Fire Department at the time of the fire or explosion and provide the dispatcher with all available information.
- (4) All appropriate product feed lines will be closed.
- (5) All injured persons will be removed, if possible, and medical treatment will be administered by qualified personnel.
- (6) All personnel will be accounted for by the emergency coordinator or designee.

If there is a risk of an impending explosion or uncontrollable fire, evacuation of the surrounding areas will be accomplished in cooperation with the local police or fire department.

Firefighting will not be done at the risk of injury to facility employees. However, every reasonable effort will be made to contain a fire prior to the arrival of outside help. All areas of the facility can be readily accessed from two sides by firefighting equipment and other emergency vehicles.

Nonessential personnel will not be allowed on-site until the emergency is over. Clean-up crews will be given assignments, and all emergency equipment will be cleaned and restocked prior to resumption of facility operations.

G.4.4.2 General Spill/Release Requirements

When any spill occurs, only those persons directly involved in clean-up activities will be permitted

within the designated hazard area. No off-site personnel, other than emergency response teams and contractors, will be permitted in the area. All facility employees, except office workers, are trained in emergency procedures for spills. The emergency coordinator will utilize as many facility employees as necessary to contain, control and clean-up the release.

Waste is always stored or transported on concrete secondary containment or paving. The site has several catchment basins in the concrete traffic areas and a low point catchment basin to prevent releases from the site.

Fire fighting water should be relatively free of hazardous constituents as areas of fire would be limited to secondary containment areas with sprinklers that should quench the fire quickly or the tank farm that has a large secondary containment capacity. The loading dock and tanker loading area also have secondary containment for containing fire response water. If water was being released from site, the water would primarily be "cooling" water, to keep other buildings cool, while something else is burning and be free of hazardous constituents.

If for some reason a chemical spill cannot be contained within the secondary containment system, the material will be isolated with either absorbent soil-like material, earthen dikes, or commercially available cloth "pigs" designed for such containment. This will prevent further migration of the spill.

Should the spill directly threaten the storm drains beneath 15th Avenue or Lincoln Street, a second set of dikes will be built at the entrance to the drains to further ensure that no liquid enters the drainage system.

The dikes will be removed only after the area has been decontaminated to ensure that no hazardous rinsate enters the storm drain system. The material used to construct the dikes will be treated as hazardous waste and disposed of in accordance with all applicable rules and regulations.

A review of the profile of the waste released, and any other information, including MSDS, chemical handbooks, or knowledge of the personnel available, it may be determined that the incident has the

potential to create a release of toxic, irritating or asphyxiating gasses that pose a threat to the health and welfare of the residents of the surrounding area. Evacuation procedures would be performed in conjunction with the local police and fire departments.

The emergency coordinator will evaluate the situation to determine if the site has the resources to regain control of the situation. To make this determination, the following criteria must be considered: Are there adequately trained personnel onsite to respond? Are there adequate supplies located onsite to respond effectively? Also, will employees be placed into life threatening situations by responding? If site personnel are not capable of responding, assistance would be summoned from the following emergency response contractor, who is available on a 24/7 basis:

MP ENVIRONMENTAL SERVICES, INC.
3045 S. 51st Avenue
Phoenix, Arizona 85043

(602) 278-6233

The active portions of the facility, anywhere waste would be present, is paved with a minimum of 6 inches of concrete. Thus, it is not anticipated that a major on-site release would result in contamination of soil. If the soil should become contaminated, it would be removed and disposed of in accordance with all applicable rules and regulations.

G.4.4.2.1 Small Leak or Spill On-Site

A small leak or spill is defined as a release that can be easily contained with absorbent or a tank truck and that poses no threat to public health, the environment or the facility.

When a small spill or leak is discovered, facility personnel will immediately contain the liquid using absorbent material. If the spill requires a tank truck to remove the liquid, the emergency coordinator will supervise the clean-up operations. Industrial grade lime is available for neutralization of acids. Used absorbent and calcium hydroxide by-products will be packed in drums, sealed, labeled in accordance with all applicable regulations and properly disposed. Any liquid pumped into a facility

truck will be sampled, analyzed and placed either in a secure container or tank until it can be processed.

G.4.4.2.2 Major Spill or Release On-Site

A major spill or chemical release is defined as a release that poses an immediate threat to the public health, the environment or the facility, and which threatens to migrate outside the secondary containment system.

When a major chemical spill or release is discovered, the emergency coordinator will immediately notify the fire department and provide all available information regarding the release. The emergency coordinator will obtain the following information regarding the spilled or released materials:

- (1) The type of material spilled.
- (2) The location of the release.
- (3) The estimated quantity and rate of release.
- (4) The direction and potential for fire from any vapors released.
- (5) Any injuries involved.
- (6) The potential for fire, explosion or environmental contamination.

The preceding information will help the emergency coordinator and outside agencies to assess the magnitude and seriousness of the spill or release.

In the event of a leak or spill in the tank storage area, all vehicular loading or unloading will cease. The containment wall surrounding the tank storage area has a capacity of greater than 68,000 gallons plus the volume of a 25 year, 24 hour rainfall.

Immediately after a spill is detected, facility employees will begin procedures to control and contain the spill or release and determine if outside assistance is required. In the event that there is a spill or release from a tank, the emergency coordinator will be notified and will make a determination if

there has been a release to the environment. If a spill greater than one pound of hazardous waste is leaked or spilled and not immediately contained and cleaned up, the emergency coordinator or his designee will immediately notify the National Response Center or the Director of the Arizona Department of Environmental Quality or his/her designee within 24 hours of detection of the leak or spill. The information to be reported is outlined in Exhibit G-7.

In the event that facility personnel and equipment are unable to handle the volume of material released, the emergency coordinator will contact MP Environmental Services, Inc., a full-service site-remediation and hazardous waste tanker and rolloff supplier, for assistance.

There are three major categories of materials that could be released:

- (1) Flammable, ignitable or combustible wastes.
- (2) Corrosive wastes.
- (3) Oxidizers and reactives.

Flammable, Ignitable or Combustible Wastes

Facility personnel assigned to contain and clean-up the released material will wear protective clothing suitable for the materials being handled.

If the release is a result of a leaking drum, the spill will be contained with absorbent material. The remaining liquid will be transferred either to a secure drum or a facility tank truck. Hand tools used will be spark resistant. The spill will be packaged in a drum, sealed, labeled and transported to a facility authorized to accept the waste for recycling, for use as an alternative fuel, or for final disposal.

If the spill or leak occurs in a tank, the flow of liquids into the tank system will be halted, if any is flowing into the tanks, and the system inspected to determine the cause of the leak. Within 24 hours of detection of the leak, waste will be removed from the tank to prevent further release and allow inspection and repair of the tank. If the spill results from a defective valve, fitting and/or hose, the

situation will be corrected after the spill area is secure. If material is pumped into tank trucks it will be sampled, tested and placed in a storage tank containing compatible material, in secure drums or in a process tank.

Any material released to secondary containment will be removed within 24 hours or as timely a manner as possible to prevent harm to human health or the environment. The containment area floor and walls affected by the release will be decontaminated with a pressurized, hot-detergent spray device. The rinsate will be pumped into a facility truck, sampled and tested. The test results will determine if the rinsate will be recycled, reused or disposed of in accordance with all applicable rules and regulations. Any visible contamination of soil or surface water will be removed and properly disposed of. Emergency equipment will be decontaminated before reuse.

After the secondary containment area has been secured, the floor will be inspected to ensure that the concrete sealant is intact. If the sealant is damaged, procedures to repair the coating will be implemented in accordance with the manufacturer's recommendation.

Corrosive Wastes

Facility personnel assigned to contain and clean-up the released material will wear protective clothing that is appropriate for the material. Appropriate protective clothing will be based on various guides to chemical hazards, MSDS, and profiles of the waste released.

The collected materials from the release will be neutralized and cleaned up with absorbent. Contaminated solids will be placed in open-top drums or roll-offs. The pH will be checked and, if at an acceptable level, the drums will be prepared for disposal in accordance with all applicable rules and regulations.

The spill area will be decontaminated with a pressurized, hot-detergent spray device. The rinsate will be pumped into a facility truck, sampled, tested, neutralized (if required) and transported to an approved facility for final disposal. Emergency equipment will be decontaminated before reuse.

After the secondary containment area has been secured, the floor will be inspected to ensure that the concrete sealant is intact. If the sealant is damaged, procedures to repair the coating will be implemented in accordance with the manufacturer's recommendation.

Oxidizers and Reactives

The chemical nature of oxidizers and reactives is that they have the potential to react with a wide array of compounds or they can react with what would appear as such benign things as air and water. The emergency coordinator will identify the particular container of concern and provide emergency response procedures on a case by case situation. Most oxidizers and reactives are in lab pack quantities with rare instances of containers up to a 55 gallon capacity. Facility personnel assigned to contain and clean-up the released material will wear protective clothing that is appropriate for the material. Appropriate protective clothing will be based on various guides to chemical hazards, MSDS, and profiles of the waste released.

The collected materials from the release will be neutralized and cleaned up with an appropriate absorbent. Contaminated solids will be placed in open-top drums and, if necessary, preventative solutions added to prevent further reactions. The drums will be prepared for disposal in accordance with all applicable rules and regulations.

The spill area will be decontaminated with a non-reactive appropriate cleaning solution. The decontamination material will be collected sampled, tested, and transported to an approved facility for final disposal. Emergency equipment will be decontaminated before reuse.

After the secondary containment area has been secured, the floor will be inspected to ensure that the concrete sealant is intact. If the sealant is damaged, procedures to repair the coating will be implemented in accordance with the manufacturer's recommendation.

Mercury

Mercury spills will be clean up by using a vacuum specifically designed for collecting mercury. Mercury decontamination powder will be used to capture mercury allowing it to be vacuumed. A mercury monitor will be used before and after cleaning to determine clean up effectiveness.

G.4.5 Prevention of Recurrence or Spread of Fires, Explosions or Releases

During the course of an emergency event, personnel may be directed to perform tasks to prevent the spread of wastes or recurrence of the situation at the facility. The personnel will be wearing appropriate personal protection equipment for the potential hazard and at no time will they be directed to perform tasks that would put them in immediate danger. If the situation is being controlled by a non-employee incident commander, e.g., Phoenix Fire Dept. officer, the directive will be approved in conjunction with the emergency coordinator.

In the event of a spill or release, these actions may include such items as ensuring the operations have ceased, collecting and containing released waste and removing or isolating containers. If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator will monitor for leaks, unscheduled or unanticipated pressure buildup, or damage to other equipment. Pressure buildup may occur in closed containers in close proximity to a heat source. Hoses or pipes may overpressure if they have closed valves at each end. Valves on adjacent tanks may crack or break due to thermal or shock stress created by a fire or explosion.

If the cause of the release from a tank did not damage the integrity of the system, which includes the secondary containment, the tank may be returned to service after any released waste is removed and any necessary repairs are made. A thorough visual inspection will be conducted on any impacted secondary containment for signs of deterioration, observing breaks, bulges, or missing pieces of the secondary containment coating. The concrete containment structure will also be inspected for signs of damage, which may include cracking or deformity from impact. Any necessary repairs will be made prior to returning the tank system to service. If repairs to components of the tank system are extensive, the component will not be returned to service until the tank has been certified by an independent, qualified, registered professional engineer in accordance with § 270.11(d) that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. If any portion of the tank system cannot be repaired, it must be closed in accordance with the procedures of § 264.197.

G.4.6 Storage and Treatment of Released Material

Immediately following an emergency event, the emergency coordinator will make certain that all recovered waste is scheduled for disposal or recycling and that any contaminated soil is disposed of in accordance with all applicable rules and regulations. The emergency coordinator shall also ensure resultant surface water is placed in a drum or tanker, sealed, labeled, sampled and recycled, burned for energy recovery or sent for final disposal in accordance with all applicable rules and regulations.

The affected containment area floor and walls will be decontaminated with a pressurized, hot-detergent spray device. The rinsate will be pumped into a facility truck, sampled and tested. The test results will determine if the rinsate will be recycled, reused or disposed of in accordance with all applicable rules and regulations. Emergency equipment will be decontaminated before reuse.

After the secondary containment area has been secured, the floor will be inspected to ensure that the concrete sealant is intact. If the sealant is damaged, procedures to repair the coating will be implemented in accordance with the manufacturer's recommendation.

G.4.7 Post-Emergency Equipment Maintenance

The affected contaminated areas will be properly decontaminated. The decontamination procedures may vary, due to the nature of the chemical released and type of material contaminated. Specific decontamination procedures have been previously described in Section G.4.4.2.2 for each type of waste.

G.5 EMERGENCY EQUIPMENT

The safety equipment layout at the facility is shown on Exhibit G-4, and the list of emergency equipment is identified in Exhibit G-5.

Fire extinguishers at the facility are of the dry chemical variety (ABC) and comply with the

National Fire Code for portable fire extinguishers. Fire extinguishers are inspected weekly by facility employees, and annually or after each use by a service contractor. Inspection records are kept in the operating log.

Following any emergency, fire extinguishers will be recharged or replaced as needed. All protective clothing will either be disposed of or steam cleaned and repacked for future use. All respirators will be checked, cleaned and replaced if necessary. All inventories of spill response materials, industrial absorbent, lime, pigs, etc., will be replenished. Any other equipment used during the emergency will be examined and brought back to standard operating conditions. All the equipment on the standard safety list will be checked and/or replaced.

G.6 COORDINATION REQUIREMENTS

Arrangements have been made with the various local authorities that may be called upon to assist in an emergency. Contingency notification letters have been provided in Exhibit G-6. These local authorities and their responsibilities are as follows:

- Phoenix Police Department - Traffic Control
- Phoenix Fire Department - Fire, initial medical care
- Arizona Department of Environmental Quality - Emergency response and assist in waste identification
- Poison Control at Good Samaritan Hospital - Medical aid (poisoning)
- Phoenix Memorial Hospital - Medical aid (primary care and burns)
- Local Emergency Planning Committee - Emergency response
- Department of Emergency Services - Spill clean-up

In addition, copies of this plan have been sent to MP Environmental Services, Inc. Arrangements have been made with MP Environmental Services, Inc. to assist Clean Harbors in the event facility equipment is not sufficient to control an emergency.

G.7 EVACUATION PLAN

The facility employs a warning alarm with specific sounds for fire or hazardous material incident and strobe lights to initiate evacuation of all plant areas. The alarm warning centers are located throughout the facility and are battery operated to ensure operation during a power outage. All employees are familiar with the location of the alarm pull stations and the warning signals.

In addition to the alarm, the internal telephone system and public address system (PA) are used to notify employees regarding the nature of any emergency and the recommended plan of action. Total plant evacuation is initiated by the activation of the alarm system. Exhibit G-3 is a diagram indicating the evacuation routes.

The following procedures are followed in the evacuation of the facility:

- (1) The signal for plant evacuation is sounded.
- (2) Employees will leave gates open through which they exit the facility. The three truck gates are electronically controlled with manual or battery overrides if there should be a power outage. Personnel gates remain secured 24 hr/day. During non-business hours the gate to the administrative offices are locked. No further entry of visitors, contractors or trucks is permitted. All vehicular traffic within the facility stops to allow the safe exit of personnel and movement of emergency equipment.
- (3) Clean Harbors employees have been trained that when the alarm sounds, to exit the facility and meet at the primary predetermined area or if conditions do not allow, at the secondary predetermined areas. Contractors and visitors are directed by their Clean Harbors escorts to immediately leave the facility through the exit gates and meet at the same predetermined location.
- (4) No person will remain within or re-enter the facility unless specifically authorized by the emergency coordinator. Only fire department personnel or non-facility emergency response teams may remain inside the facility without the authorization of the emergency coordinator.

- (5) All facility personnel will be accounted for by their supervisor and the emergency coordinator. Contractors and visitors will be accounted for by their Clean Harbors escort.
- (6) After identifying whether all personnel are present, each supervisor will compile a list and so notify the emergency coordinator the status of the personnel under their control. The fire department will be immediately notified in the event any facility personnel, visitors, or contractors are unaccounted for.
- (7) Contractors, subcontractors, or vendor personnel and other visitors may not be escorted by facility personnel at all times. If they are not continuously escorted, prior to initiating work, all contractors are briefed on the contingency plan, including evacuation signals, evacuation routes, and applicable site hazards.
- (8) A final personnel tally will be made by the emergency coordinator.
- (9) Re-entry into the fenced area of the facility will be made only after clearance is given by the emergency coordinator.

G.8 REQUIRED REPORTS

The owner or his designee will notify the director of ADEQ or his/her designee and appropriate local authorities that the facility is in compliance with paragraph (h) of 264.56 before operations are resumed in the affected area(s) of the facility. The emergency coordinator will make certain that no waste which may be incompatible with the released material has been treated, stored or disposed of, until all clean-up procedures are completed. All emergency equipment listed in the Contingency Plan will be cleaned and refitted for its intended use.

Clean Harbors facility management will note in the operating record, the time, date and details of any incident that required implementation of the Contingency Plan. Within 24 hours of detection of

the incident, the director of ADEQ or his/her designee will be notified with the following information:

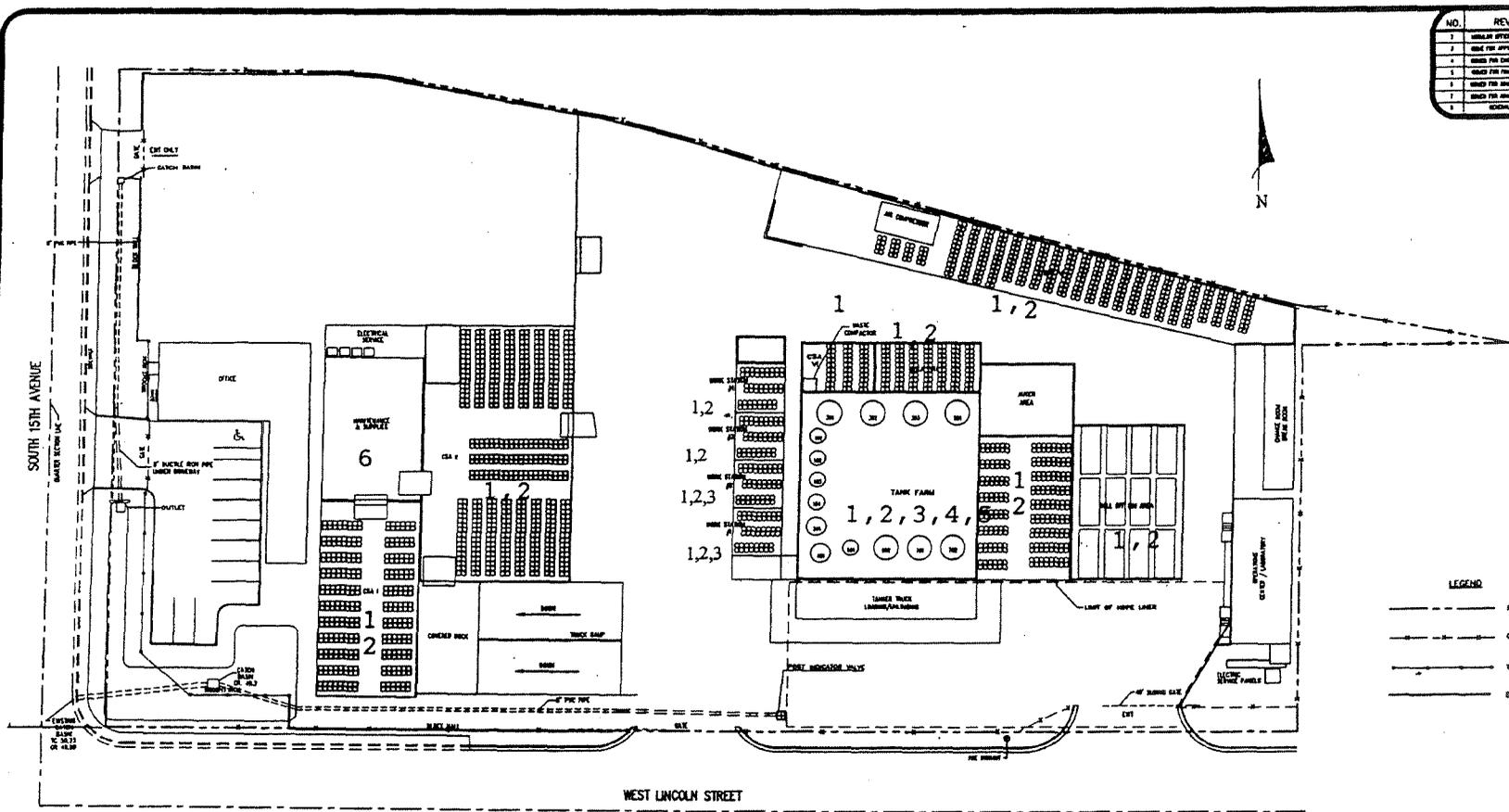
- (1) Name, address and telephone number of the owner or operator.
- (2) Name, address and telephone number of the facility.
- (3) Date, time and type of incident.
- (4) Name and quantity of material(s) involved.
- (5) The extent of injuries, if any.
- (6) An assessment of actual or potential hazards to human health or the environment, if applicable.
- (7) An estimated quantity and disposition of recovered material that resulted from the incident.

Within 30 days of detection of a release to the environment, a report must be submitted to the Director of ADEQ or his designee. The report must include the following information:

- (1) The likely route of migration of the release;
- (2) Characteristics of the surrounding soil;
- (3) Results of any monitoring or sampling connected with the release;
- (4) Proximity to downgradient drinking water, surface water, and populated areas; and
- (5) Description of the response action taken or planned.

EXHIBIT G-1
LOCATION OF STORAGE AREAS

NO.	REVISION	DATE	BY
1	ISSUED FOR PERMIT REVIEW	10/14/93	MSD
2	ISSUED FOR PERMIT REVIEW	10/14/93	MSD
3	ISSUED FOR PERMIT REVIEW	10/14/93	MSD
4	ISSUED FOR PERMIT REVIEW	10/14/93	MSD
5	ISSUED FOR PERMIT REVIEW	10/14/93	MSD
6	ISSUED FOR PERMIT REVIEW	10/14/93	MSD
7	ISSUED FOR PERMIT REVIEW	10/14/93	MSD
8	ISSUED FOR PERMIT REVIEW	10/14/93	MSD
9	ISSUED FOR PERMIT REVIEW	10/14/93	MSD
10	ISSUED FOR PERMIT REVIEW	10/14/93	MSD
11	ISSUED FOR PERMIT REVIEW	10/14/93	MSD
12	ISSUED FOR PERMIT REVIEW	10/14/93	MSD
13	ISSUED FOR PERMIT REVIEW	10/14/93	MSD
14	ISSUED FOR PERMIT REVIEW	10/14/93 </tr	



LEGEND

---	PROPERTY LINE
- - - -	CHAIN LINK FENCE
---	TROUGH IRON FENCE
---	BLOCK WALL



Materials

- 1- Containerized RCRA Waste
- 2- Containerized non-RCRA Waste
- 3- RCRA Bulk Fuel
- 4- RCRA Bulk Waste Water
- 5- Non-RCRA Bulk Oil/Water
- 6- Product Supplies

CleanHarbor
- ENVIRONMENTAL SERVICES -

Location of Storage Areas

CLEAN HARBORS ENVIRONMENTAL SERVICES
1540 WEST LINCOLN STREET
PHOENIX, ARIZONA
PHONE: (602) 256-8153 FAX: (602) 256-8353

DATE PLOTTED	SCALE	DATE	SCALE
DATE INK	SCALE	DATE	SCALE
DATE	SCALE	DATE	SCALE
DATE	SCALE	DATE	SCALE

EXHIBIT G-2
LIST OF EMERGENCY RESPONSE CONTACTS

- **List of Emergency Response Contacts**

Emergency Type	Agency/Firm	Phone Number
Injury	Phoenix Paramedics	911
	Phoenix Memorial Hospital (1201 S. 7th Ave.)	602-258-5111
Fire/Explosion	Phoenix Fire Department	911
Spill or Hazardous Material Release	Arizona Dept. of Environmental Quality	602-771-2330
	Phoenix Fire Department	911
(off-site)	National Response Center	800-424-8802 202-267-2165 (fax)
(off-site)	U.S. Environmental Protection Agency	866-EPA-WEST (866-372-9378)
	MP Environmental Services, Inc.	602-278-6233
Poison	National Poison Control Center	800-362-0101
	Samaritan Regional Poison Center (1441 N. 12th Street)	602-253-3334
Emergency Event	Arizona Dept. of Environmental Quality	602-771-2330
	Phoenix Police Department	911

CLEAN HARBORS ARIZONA, LLC
1340 W LINCOLN ST.
PHOENIX, ARIZONA

List of Emergency Coordinators

Primary Emergency Coordinator

Brian Parker

Business: (602) 258-6155

General Manager

Residence: (480) 703-9066

45613 W Dutchman Drive

Mobile: (602) 721-7238

Maricopa, Arizona

Alternate

Robert Woods

Business: (602) 258-6155

Facility Foreman

Residence: (520) 705-0366

42742 W Hillman Dr

Mobile: (480) 262-2463

Maricopa, Arizona

Alternate

Paul Steber

Business: (602) 258-6155

Facility Foreman

Residence: (480) 899-9422

2380 E Fairview St.

Mobile: (602) 209-2294

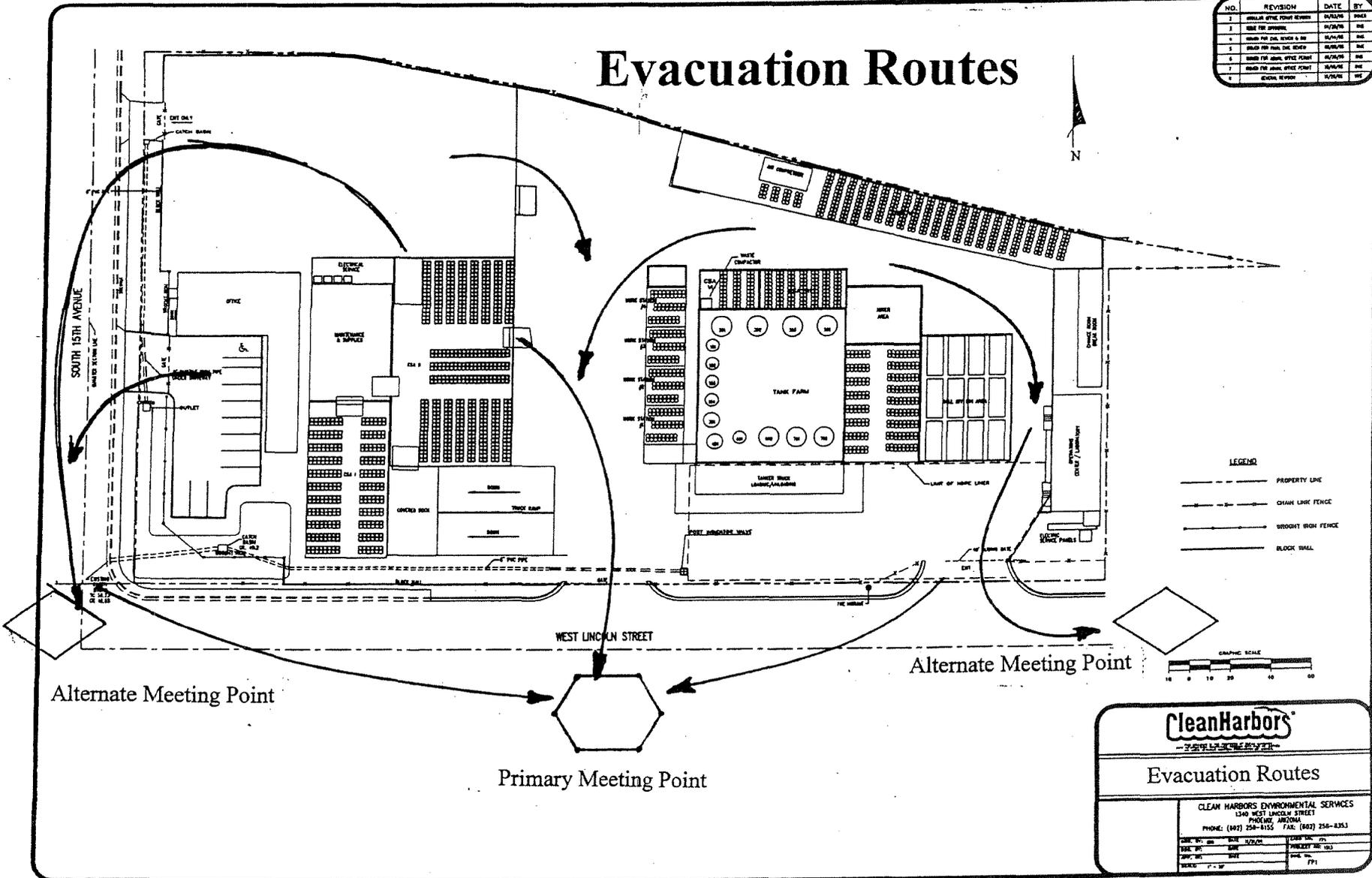
Chandler, Arizona

Section G
Revision No. 10
Date: 09/26/08

EXHIBIT G-3
EVACUATION ROUTES

Evacuation Routes

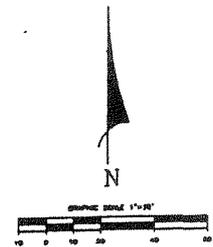
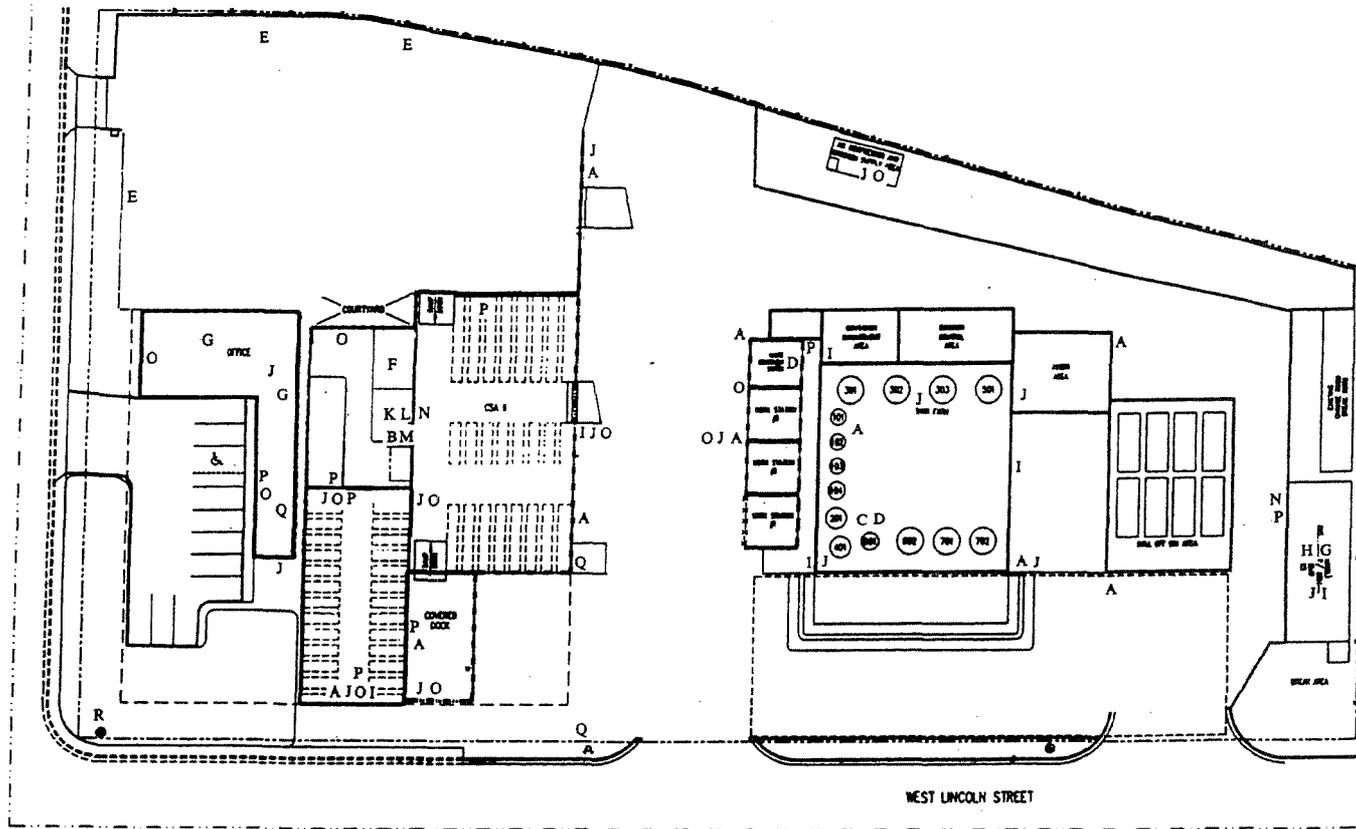
NO.	REVISION	DATE	BY
1	ISSUE FOR PERMITS	02/20/08	MEG
2	ISSUE FOR PERMITS	02/20/08	MEG
3	ISSUE FOR PERMITS	02/20/08	MEG
4	ISSUE FOR PERMITS	02/20/08	MEG
5	ISSUE FOR PERMITS	02/20/08	MEG
6	ISSUE FOR PERMITS	02/20/08	MEG
7	ISSUE FOR PERMITS	02/20/08	MEG
8	ISSUE FOR PERMITS	02/20/08	MEG



Section G
Revision No. 10
Date: 09/26/08

EXHIBIT G-4
SAFETY EQUIPMENT LAYOUT

SOUTH 15TH AVENUE



- | | | |
|------------------|------------------------------|---------------------------|
| A - absorbent | G - emergency lights | M - emergency phone |
| B - neutralizer | H - first aid supplies | N - P. A. speakers |
| C - hoses | I - emergency eyewash/shower | O - alarm pull stations |
| D - static lines | J - fire extinguishers | P - alarm warning centers |
| E - supply drums | K - blower | Q - annunciator panels |
| F - PPE supplies | L - SCBA's | R - fire hydrant |

Clean Harbors Arizona

SAFETY EQUIPMENT LAYOUT

1340 West Lincoln Street
Phoenix, AZ 85007

EXHIBIT G-5
EMERGENCY EQUIPMENT

EXHIBIT G-5

EMERGENCY EQUIPMENT

EMERGENCY EQUIPMENT	MINIMUM QUANTITY	FUNCTION
Eye Wash/Shower Stations	5	Immediate first aid (rinsing/dowsing) for exposure
Protective Clothing (Tyvek)	10	Full body protection from solids and minimal splashing
Protective Clothing (acid and solvent resistant suits)	10	Full body protection from liquids
Protective Gloves (Leather)	20 pair	Hand protection from abrasion
Protective Gloves (PVC)	20 pair	Hand protection from solvents
Protective Gloves (Neoprene)	20 pair	Hand protection from corrosives
Chemical Resistant Overshoe Footwear	5 pair	Foot protection from liquids
Eyeglasses with sideshields	10 pair	Eye protection
Fire Extinguisher (Type ABC)	10	Fire control
Static Lines	2	Prevention of static buildup
Fresh Air Blower (3000 CFM)	1	Air circulation
Telephones in Plant	1	Emergency communication
PA Speakers	2	Normal & emergency communication
Alarm Warning Centers	7	Emergency notification
Alarm Pull Stations	10	Emergency notification
Shovel, spark proof	4	Spill containment
Hand tools, spark proof bung wrench, hammer, 1 1/18"socket	1	Tools for opening and closing drums
Emergency Lighting	3	Provide lighting in case of power Failure
Forklifts	2	Transportation of drums and Equipment
Standard Industrial Absorbent	500 lbs	Clean-up small spills except acid
Standard Calcium Hydroxide	200 lbs	Neutralize acid spills and clean-up acid spills

EMERGENCY EQUIPMENT
(Continued)

EMERGENCY EQUIPMENT	QUANTITY	FUNCTION
Steel Drums - 55 gallon	10	Waste containment
Polypropylene Drums - 55 gallon	5	Waste containment
Polypropylene Drums - 85 gallon	10	Waste containment
Face Shields or Protective Eye Glasses	5	Face and eye protection
Air Purifying Respirator w/chemical multigas cartridges (NIOSH)	10	Respiratory tract protection
SCBA Units	2	Respiratory tract protection
Line Air System with 2 respirators	1	Respiratory tract protection
Portable Diaphragm Pumps	2	Transfer liquids
Hoses w/ quick couples	5	Hoses for pumps
First Aid Supplies	1 Kit	Personnel protection
Mercury Vacuum	1	Mercury spill response
Mercury Monitor	1	Monitor air for mercury operations
Mercury Decontamination Powder	5 Gallons	Mercury spill response

EXHIBIT G-6
CONTINGENCY PLAN NOTIFICATION LETTERS



140 West Lincoln Street
Phoenix, AZ 85007
602.258.6155
Fax 602.462.2391

January 12, 2007

Certified Mail Receipt No.
7000 0520 0021 6578 8227

Emergency Response Unit
Arizona Department of Environmental Quality
1110 W Washington Street
Phoenix, AZ 85007

RE: Contingency Plan

Attention Emergency Responder:

Please find enclosed an updated Contingency Plan and updates to the List of Emergency Coordinators. Our methods of operation remain the same. The plan is supplied to you as a requirement of The Resource Conservation and Recovery Act (RCRA), more specifically as outlined in 40 CFR Parts 264 and 265 Subpart D. The Plan should be used by your organization to determine an appropriate response should an emergency occur at our facility.

This plan will be amended whenever applicable regulations are revised; the plan fails in an emergency; the facility changes in its design, operation, or the response necessary in an emergency; the list of emergency coordinators changes; or the list of emergency equipment changes.

If, after review of this Plan, you believe information in the Plan needs to be changed, added, or deleted, please feel free to call me at 602-258-6155 so that we can improve this document. No response from your organization signifies that the Contingency Plan is acceptable at this time.

Sincerely,

Lon Stewart
Regulatory Compliance Manager

enclosure



40 West Lincoln Street
Phoenix, AZ 85007
602.258.6155
Fax 602.462.2391

January 12, 2007

Certified Mail Receipt No.
7000 0520 0021 6578 8234

MP Environmental Services
3045 S. 51st Avenue
Phoenix, AZ 85043

RE: Contingency Plan

Attention Emergency Responder:

Please find enclosed an updated Contingency Plan and updates to the List of Emergency Coordinators. Our methods of operation remain the same. The plan is supplied to you as a requirement of The Resource Conservation and Recovery Act (RCRA), more specifically as outlined in 40 CFR Parts 264 and 265 Subpart D. The Plan should be used by your organization to determine an appropriate response should an emergency occur at our facility.

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Sincerely,

A handwritten signature in black ink, appearing to read "Lon Stewart", is written over a white background.

Lon Stewart
Regulatory Compliance Manager

enclosure



40 West Lincoln Street
Phoenix, AZ 85007
602.258.6155
Fax 602.462.2391

January 12, 2007

Certified Mail Receipt No.
7000 0520 0021 6578 8241

Materials Management Section
Phoenix Memorial Hospital
1201 S 7th Avenue
Phoenix, AZ 85007

RE: Contingency Plan

Attention Emergency Responder:

Please find enclosed an updated Contingency Plan and updates to the List of Emergency Coordinators. Our methods of operation remain the same. The plan is supplied to you as a requirement of The Resource Conservation and Recovery Act (RCRA), more specifically as outlined in 40 CFR Parts 264 and 265 Subpart D. The Plan should be used by your organization to determine an appropriate response should an emergency occur at our facility.

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Sincerely,

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Lon Stewart
Regulatory Compliance Manager

enclosure



40 West Lincoln Street
Phoenix, AZ 85007
602.258.6155
Fax 602.462.2391

January 12, 2007

Certified Mail Receipt No.
7000 0520 0021 6578 8333

Phoenix Fire Department
City of Phoenix
150 S 12th Street
Phoenix, AZ 85034

RE: Contingency Plan

Attention Emergency Responder:

Please find enclosed an updated Contingency Plan and updates to the List of Emergency Coordinators. Our methods of operation remain the same. The plan is supplied to you as a requirement of The Resource Conservation and Recovery Act (RCRA), more specifically as outlined in 40 CFR Parts 264 and 265 Subpart D. The Plan should be used by your organization to determine an appropriate response should an emergency occur at our facility.

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Sincerely,

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Lon Stewart
Regulatory Compliance Manager

enclosure



40 West Lincoln Street
Phoenix, AZ 85007
602.258.6155
Fax 602.462.2391

January 12, 2007

Certified Mail Receipt No.
7000 0520 0021 6578 8340

Chief of Police
City of Phoenix Police Department
620 W Washington Street
Phoenix, AZ 85003

RE: Contingency Plan

Attention Emergency Responder:

Please find enclosed an updated Contingency Plan and updates to the List of Emergency Coordinators. Our methods of operation remain the same. The plan is supplied to you as a requirement of The Resource Conservation and Recovery Act (RCRA), more specifically as outlined in 40 CFR Parts 264 and 265 Subpart D. The Plan should be used by your organization to determine an appropriate response should an emergency occur at our facility.

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Sincerely,

Lon Stewart
Regulatory Compliance Manager

enclosure



1740 West Lincoln Street
Phoenix, AZ 85007
602.258.6155
Fax 602.462.2391

January 12, 2007

Certified Mail Receipt No.
7000 0520 0021 6578 8357

Mr. David Mathews
Local Emergency Planning Committee
2035 N 52nd Street
Phoenix, AZ 85008

RE: Contingency Plan

Attention Emergency Responder:

Please find enclosed an updated Contingency Plan and updates to the List of Emergency Coordinators. Our methods of operation remain the same. The plan is supplied to you as a requirement of The Resource Conservation and Recovery Act (RCRA), more specifically as outlined in 40 CFR Parts 264 and 265 Subpart D. The Plan should be used by your organization to determine an appropriate response should an emergency occur at our facility.

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Sincerely,

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Lon Stewart
Regulatory Compliance Manager

enclosure



1340 West Lincoln Street
Phoenix, AZ 85007
602.258.6155
Fax 602.462.2391

January 12, 2007

Certified Mail Receipt No.
7000 0520 0021 6578 8364

Mr. Dan Roe
Hazardous Materials Section
Department of Emergency Services
5636 E McDowell Road
Phoenix, AZ 85008

RE: Contingency Plan

Attention Emergency Responder:

Please find enclosed an updated Contingency Plan and updates to the List of Emergency Coordinators. Our methods of operation remain the same. The plan is supplied to you as a requirement of The Resource Conservation and Recovery Act (RCRA), more specifically as outlined in 40 CFR Parts 264 and 265 Subpart D. The Plan should be used by your organization to determine an appropriate response should an emergency occur at our facility.

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Sincerely,

Lon Stewart
Regulatory Compliance Manager

enclosure



1340 West Lincoln Street
Phoenix, AZ 85007
602.258.6155
Fax 602.462.2391

January 12, 2007

Certified Mail Receipt No.
7000 0520 0021 6578 8371

Samaritan Regional Poison Center
1441 N 12th Street
Phoenix, AZ 85006

RE: Contingency Plan

Attention Emergency Responder:

Please find enclosed an updated Contingency Plan and updates to the List of Emergency Coordinators. Our methods of operation remain the same. The plan is supplied to you as a requirement of The Resource Conservation and Recovery Act (RCRA), more specifically as outlined in 40 CFR Parts 264 and 265 Subpart D. The Plan should be used by your organization to determine an appropriate response should an emergency occur at our facility.

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Sincerely,

Lon Stewart
Regulatory Compliance Manager

enclosure



1340 West Lincoln Street
Phoenix, AZ 85007
602.258.6155
Fax 602.462.2391

January 12, 2007

Certified Mail Receipt No.
7000 0520 0021 6578 8388

Mr. Anthony Leverock
Waste Programs Permits
Arizona Department of Environmental Quality
1110 W Washington Street
Phoenix, AZ 85007

RE: Contingency Plan

Attention Emergency Responder:

Please find enclosed an updated Contingency Plan and updates to the List of Emergency Coordinators. Our methods of operation remain the same. The plan is supplied to you as a requirement of The Resource Conservation and Recovery Act (RCRA), more specifically as outlined in 40 CFR Parts 264 and 265 Subpart D. The Plan should be used by your organization to determine an appropriate response should an emergency occur at our facility.

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Sincerely,

Lon Stewart
Regulatory Compliance Manager

enclosure

EXHIBIT G-7
INCIDENT REPORTING PROTOCOL

Incident Reporting Protocol

- (1) Name, address and telephone number of the owner or operator;

Clean Harbors Arizona, LLC

1340 W. Lincoln Street

Phoenix, AZ 85007

602-258-6155

- (2) Name, address and telephone number of the facility;

Same as number (1) above.

- (3) Date, time and type of incident (e.g., fire or explosion);
- (4) Name and quantity of material(s) involved;
- (5) The extent of injuries, if any;
- (6) An assessment of actual or potential hazards to human health or the environment, if applicable; and,
- (7) An estimated quantity and disposition of recovered material that resulted from the incident.