

ATTACHMENT E - CONTINGENCY PLAN

CONTINGENCY PLAN

Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, AZ 85128

AZD 081 705 402

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1. INTRODUCTION

Heritage Environmental Services, LLC (“Heritage”) owns and operates a commercial hazardous waste management facility located at 284 East Storey Road (formerly 5122 East Storey Road) in Coolidge, Arizona. A facility drawing is included as Figure E-1 in Appendix E-A. Heritage operates under a Part B Resource Conservation and Recovery Act (RCRA) permit. Heritage is permitted to store and consolidate RCRA hazardous wastes from a wide variety of off-site sources, including but not limited to manufacturing facilities, remediation sites, other waste treatment and storage facilities, and transporters. In general, hazardous wastes managed at the Heritage Coolidge facility include: solids, liquids and sludges; contaminated soils and debris; organic wastestreams such as inks, paints, solvents, and other hydrocarbons; contaminated waters and leachate; lab packs; and treatment residues from other waste treatment and storage facilities. The specific hazardous wastes that Heritage is permitted to manage are listed in the Coolidge facility’s Waste Analysis Plan.

The facility has multiple permitted container storage areas, consolidation areas, and staging areas. The permitted hazardous waste Container Storage Areas are shown in the facility drawing (Figure E-1) and include the following:

- Central Container Storage Area (Central Area),
- East Container Storage Area (East Area),
- Lab Depack Area (Depack Area),
- Hazardous Roll-off Storage Area (Roll-off Area),
- Dock and Van Container Storage Area (Van Area),
- Bulk Loading Area (Tanker and Rail), and
- 800 Area Container Storage (800 Area).

Volumes of the Container Storage Areas are summarized in Table E-1.

Hazardous and nonhazardous wastes are stored in the container storage areas noted above based on compatibility. Waste solids are consolidated into roll-off boxes in the Roll-off Area, the Central Area, or the Van Area. Filter cake solids are blended into roll-offs in the Roll-off Area, typically for off-site metals reclamation. Inert materials (e.g., diatomaceous earth, silica pellets) may be added to meet the specification of the off-site reclamation facility. Liquid and solid wastes are consolidated into railcars at the Bulk Loading Area (Tanker and Rail). Tankers are loaded in the Bulk Loading Area and the Van Loading Area. Liquid wastes are bulked into containers, and totes in the Central Area or the Van Area. Lab pack wastes are consolidated in the Depack Area or another permitted container storage area.

**TABLE E-1
SUMMARY OF PERMITTED STORAGE VOLUMES**

Location	Volume Permitted	Containment Volume
Central Container Storage Area	25,300 gallons	10,552 gallons
East Container Storage Area	6,600 gallons	919 gallons
Lab Depack Area	1,100 gallons	Containment pallets/lab carts
Roll-off Container Storage Area	100 cubic yards	Not required (solids area)
Dock and Van Container Storage Area	10,250 gallons	46,234 gallons
800 Area Container Storage	20,451 gallons	Containment Pallets
Bulk Loading Area (Tanker and Rail)	20,900 gallons	25,847 gallons

This Contingency Plan is intended to minimize hazards to human health and the environment and addresses imminent or actual emergency situations which may lead to a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or surface water. As discussed in this Plan, the designated Emergency Coordinators for the facility are:

Terry Baer (cellular telephone no. 520/280-2926),

Kenneth Payne (cell no. 520/258-2094), and

Amy Vasquez (cell no. 602/293-7189).

The Emergency Coordinators are responsible for coordinating all emergency response measures, and they are authorized to commit the necessary resources to implement this Plan.

Heritage also maintains a separate Procedures to Prevent Hazards document at the facility. A copy of the Table of Contents for the Procedures to Prevent Hazards is provided as Appendix E-E for reference. In summary, the Procedures to Prevent Hazards details security measures, equipment, and preventive procedures implemented at the facility to prevent hazards during daily operations.

For security, a chain link fence with three strands of barbed wire surrounds the facility, with the main gate (located on Storey Road) controlled by electronic key access. The typical operating hours of the facility are 6:00 AM to 5:00 PM, seven days per week. In the event of an evacuation, facility personnel control access to the facility.

Emergency equipment present at the facility includes automatic fire detection devices and manual pull-down fire alarms. When engaged, these devices activate internal horns and strobe lights and automatically notify a third-party security firm. Employees are equipped with two-way radios or have access to air horns to alert key personnel in the event of an emergency.

In addition, the Central Container Storage Area and the 800 Area Container Storage Area are equipped with an automatic fire suppression system that is water-AR-AFFF foam based. There are several water outlets, including fire hydrants, within the facility that may be utilized in an emergency. The facility is also equipped with conventional hand-held A/B/C fire extinguishers, two 125-pound wheeled fire extinguishers rated B/C for flammable liquid and electrical fires (both located in the Central Container Storage Area), and two Class D fire extinguishers (one located in the Lab Depack Area and one located in 800 Area Container Storage by the north door). There are also four 55-gallon containers of AFFF fire suppression foam available for response to a fire (stored outside the southwest corner of the Central Container Storage Area). Heritage personnel have been trained in fire response by the local fire department.

In the event of a power failure, the facility may have to cease operations, but there will be no threat of a release or endangerment to human health or the environment. Emergency lighting is available at the facility. Ingress/egress to/from the facility would be via the man gates or the main gate, which can also be manually opened. The fire pump for the fire suppression system is powered by a diesel engine designed to operate with or without power either in automatic or manual mode.

As examples of preventive procedures, Heritage prohibits certain wastestreams that are considered temperature sensitive from being accepted at the facility during the months of June through September. In addition, water-reactive wastes are only stored in the Lab Depack Area.

Heritage employees have been trained in the Contingency Plan and the Procedures to Prevent Hazards documents established for emergencies at the facility.

CONTINGENCY PLAN DISTRIBUTION

A copy of the Plan and all revisions to the Plan are maintained at the facility and submitted to local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. Copies of the Plan are mailed to the following:

- ADT Security Services, Inc.;
- Coolidge Police Department;
- Pinal County Sheriff's Department;
- Arizona Department of Public Safety;
- Coolidge Fire Department;
- Casa Grande Regional Medical Center;
- Fast Med Urgent Care;
- Kary Environmental Services, Inc.;
- Pinal County Local Emergency Planning Committee c/o Pinal County Office of Emergency Management; and
- Arizona Emergency Response Commission c/o Arizona Division of Emergency Management.

The emergency response contacts are provided notice within 30 days describing any significant changes in volumes of wastes handled or significant design changes to the facility.

2. REVIEW AND AMENDMENT OF CONTINGENCY PLAN

The Plan is reviewed and amended, if necessary, when:

- The facility permit is revised;
- The Plan fails in an emergency;
- The facility changes in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- The list of emergency coordinators changes; or
- The list of emergency equipment changes.

3. EMERGENCY COORDINATOR

3.1. Identification

Heritage has named the personnel listed in Appendix E-B as Primary and Alternate Emergency Coordinators. Heritage has assigned several Emergency Coordinator Alternates to ensure that at least one Emergency Coordinator (or Alternate) will be on-site or on-call at all times.

If the primary Emergency Coordinator is on-site, she will be designated the Emergency Coordinator. If the primary Emergency Coordinator is not on-site, but an Emergency Coordinator Alternate is on-site, the on-site Emergency Coordinator Alternate may be designated as the Emergency Coordinator for the imminent or actual emergency situation.

If no Emergency Coordinator or Emergency Coordinator Alternate is on-site, efforts will be made to reach the Emergency Coordinator or one of the Emergency Coordinator Alternates. For the remainder of this Plan the term "Emergency Coordinator" will refer to the Emergency Coordinator or Emergency Coordinator Alternate or the Emergency Coordinator (or Alternate) "designee" if the Emergency Coordinator (or Alternate) is on-call.

3.2. Responsibility

The Emergency Coordinator is responsible for coordinating all emergency response measures. This Plan describes many emergency response steps that the Emergency Coordinator will take. These actions may be taken by other individuals at the direction of the Emergency Coordinator.

3.3. Authority

The Emergency Coordinator has the authority to commit necessary resources to implement this Plan.

4. IMPLEMENTATION

This section is a description of the steps that will be taken to implement this Plan. Section 6, Emergency Actions, describes specific response procedures for anticipated emergency situations. Whenever an imminent or actual emergency situation develops, the employee discovering the situation should take immediate action to safely prevent or contain the imminent or actual emergency situation and immediately notify the Supervisor on duty. If the Supervisor suspects that an imminent or actual emergency situation exists that could lead to a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water, the Supervisor should immediately notify the Emergency Coordinator (Section 4).

If the Emergency Coordinator determines that an imminent or actual emergency situation exists that could lead to a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water, the Emergency Coordinator will institute specific procedures depending on the type of imminent or actual emergency situation as outlined in Section 6, Emergency Actions. The specific criterion for implementation of this Plan is facility evacuation as described in Section 7, Evacuation Plan.

In the event of a fire, explosion, sudden or non-sudden release that requires implementation of this Plan, the Emergency Coordinator will activate internal facility alarms or communication systems to evacuate personnel (Section 7, Evacuation Plan). The Emergency Coordinator will notify appropriate State or local agencies with designated response roles, if outside help is needed (Section 8, Emergency Telephone Numbers).

The Emergency Coordinator will identify the character, exact source, amount, and a real extent of any released materials by consulting container labels, tank truck placards, and/or the operating record. Concurrently, the Emergency Coordinator will assess possible hazards to human health and the environment that may result from the imminent or actual emergency situation. This assessment will consider both direct and indirect effects of the release, fire, or explosion.

If the Emergency Coordinator has determined that the facility has had a release, fire, or explosion which could threaten human health or the environment outside of Heritage property, the Emergency Coordinator will notify the Arizona Department of Public Safety Dispatcher, the National Response Center, the Arizona Department of Environmental Quality (ADEQ), and other agencies, as necessary. The report will include:

- Name and telephone number of reporter;
- Name and address of facility;
- Time and type of incident;
- Name and quantity of material(s) involved, to the extent known;
- Extent of injuries, if any; and
- Possible hazards to human health or the environment.

If the Emergency Coordinator's assessment indicates that evacuation of local areas may be advisable, she will immediately notify appropriate local authorities. She will be available to assist appropriate officials in deciding whether local areas should be evacuated (Section 6.6).

During an imminent or actual emergency situation, the Emergency Coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures include, where applicable, stopping operations, collecting and containing released waste, and removing or isolating containers.

If the facility suspends operations in response to a fire, explosion, or release, the Emergency Coordinator will monitor for leaks, pressure buildup, gas generation, or ruptures in containers, as appropriate. The Emergency Coordinator will provide for treatment, storage, or disposal of recovered waste, contaminated soil, contaminated surface water, or any other material that results from a release, fire, or explosion at the facility.

The Emergency Coordinator will ensure that in the affected area(s) of the facility no waste that is incompatible with the released material is stored until cleanup procedures are completed, and all emergency equipment used in the response and listed in the Contingency Plan is cleaned and fit for its intended use or replaced before operations in the affected area are resumed.

The Emergency Coordinator will notify appropriate authorities that the facility is in compliance with the above paragraph of this Plan before operations are resumed in the affected area(s) of the facility.

Heritage will note in the operating record the time, date, and details of any incident that requires implementation of the Contingency Plan. Heritage will submit a written report within 15 days of the incident to the Arizona Department of Environmental Quality (ADEQ). The report will include the following:

- Name, address, and telephone number of the owner or operator;
- Name, address, and telephone number of the facility;
- Date, time, and type of incident (e.g., fire, explosion);
- Name and quantity of material(s) involved;
- The extent of injuries, if any;
- An assessment of actual or potential hazards to human health or the environment, if applicable; and
- Estimated quantity and disposition of recovered material that resulted from the incident.

5. EMERGENCY ACTIONS

The purpose of this section of the Plan is to describe the specific procedures for anticipated imminent or actual emergency situations that could lead to a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water in a clear and concise manner for ease of reference during an emergency. The Supervisor or Emergency Coordinator, with an understanding of the information provided in Section 5, Implementation, will reference the following sections and follow the response steps.

5.1. Fire/Heat Alarm Notification from Monitoring Company Outside Normal Working Hours

- The monitoring company will alert the Fire Department should an alarm or unknown incident occur that engages fire detection devices (see Table E-2, Summary of Permanent Real-Time Monitors)
- The monitoring company will contact the Emergency Coordinator(s) listed
- The first responding Emergency Coordinator is required to respond to the reported incident as soon as practical to assess the situation
- Alarms will be responded to and considered high risk unless visually confirmed otherwise by the Emergency Coordinator and/or the Fire Department
- The Emergency Coordinator and the Fire Department are authorized to utilize any reasonable means and resources necessary to accurately assess and stabilize an incident in accordance with the Contingency Plan

5.2. Fire

The employee discovering the fire will:

- Notify the Supervisor on duty.

A trained employee may:

- Discharge portable or other fire extinguishing equipment; and
- Remove or isolate materials which may contribute to the spread or intensity of the fire, to the extent possible.

The Supervisor will:

- Determine source of fire;
- Determine the type of material(s) involved;
- Notify the Emergency Coordinator immediately; and
- Notify the fire department if the fire cannot be extinguished with portable or other available equipment (Section 8, Emergency Telephone Numbers).

In the event of a fire, the Emergency Coordinator will:

- Assess the situation as described in Section 5 to determine if the Contingency Plan will be implemented.

If the plan is implemented, (as described in Section 5 upon evacuation of the facility) the Emergency Coordinator will:

- Evacuate facility and control access following procedures described in Section 7, Evacuation Plan;

- Notify the fire department if the fire cannot be extinguished with portable or other available equipment (Section 8, Emergency Telephone Numbers);
- Transfer response command to fire responders, as appropriate;
- Determine nature of chemical risks;
- Assess danger of explosion and further ignition;
- Remove or isolate materials which may contribute to the spread or intensity of the fire, to the extent possible;
- Order a controlled and orderly shut down of affected operations, as appropriate;
- Monitor operations which were shut down in response to the emergency for build-up of pressure, leaks, ruptures, etc.; and
- Take steps to contain or prevent the run-off of any fire-fighting water involved in the incident.

Upon resolution of the fire, the Emergency Coordinator will:

- Initiate actions for the clean-up and decontamination of the site;
- Initiate actions for the clean-up, inspection, and/or replacement of the emergency equipment used to respond to the emergency; and
- Provide for the characterization, treatment, storage, or disposal of the wastes and any contaminated debris, water, and soil generated by the fire.

Operations will not be resumed in affected area(s) of the facility until all facility emergency equipment listed in this Plan is present, in good condition, and ready for its intended use.

5.3. Explosion

An employee discovering a potential or actual explosion will immediately notify the Supervisor on duty. The Supervisor will immediately notify the Emergency Coordinator.

In the event of an explosion, the Emergency Coordinator will:

- Implement the Contingency Plan (as described in Section 5).

Upon evacuation of the facility (following procedures set out in Section 7, Evacuation Plan), the Emergency Coordinator will:

- Notify the fire department, if applicable (Section 8, Emergency Telephone Numbers);
- Assess the area and follow the procedures for fires, spills, or releases of toxic gases, fumes, or vapors;
- Determine nature of chemical risks;
- Assess danger of explosion and further ignition;
- Determine and remove the source of the explosion, to the extent possible;
- Remove sources of ignition, to the extent possible;
- Order a controlled and orderly shut down of operations affected by the potential or actual explosion, as appropriate;
- Monitor operations which were shut down in response to the emergency for build-up of pressure, leaks, ruptures, etc.; and
- Assess the potential or actual explosion and consequences relative to facility response equipment to determine if outside help is needed.

Upon resolution of the explosion, the Emergency Coordinator will:

- Initiate actions for the clean-up and decontamination of the site;
- Initiate actions for the clean-up, inspection, and/or replacement of the emergency equipment used to respond to the emergency; and
- Provide for the characterization, treatment, storage, or disposal of the wastes and any contaminated debris, water, and soil generated by the explosion.

Operations will not be resumed in affected area(s) of the facility until all facility emergency equipment listed in this Plan is present, in good condition, and ready for use.

5.4. Transfer Operations Spill

Any employee discovering an actual or potential transfer operations spill will:

- Take immediate action to safely prevent or contain the spill; and
- Notify the Supervisor on duty immediately.

The Supervisor will:

- Determine source of spill;
- Determine the type of material(s) spilled;
- Take immediate action to safely prevent or contain the spill;
- Remove sources of ignition;
- Remove incompatible materials from the immediate area, to the extent possible; and
- Notify the Emergency Coordinator, as appropriate.

The Emergency Coordinator will:

- Assess the situation as described in Section 5, Implementation, to determine if the Contingency Plan will be implemented.
- Solicit assistance from a qualified employee, such as a trained chemist, to assist in managing the spill response.

If the Plan is to be implemented, (as described in Section 5 upon evacuation of the facility) the Emergency Coordinator will:

- Evacuate facility following procedures set out in Section 7, Evacuation Plan;
- Assess the area for potential sources of explosion or ignition;
- Determine nature of chemical risks;
- Remove incompatible materials from the immediate area, to the extent possible;
- Order a controlled and orderly shut down of operations affected by the potential or actual spill, as appropriate;
- Monitor operations which were shut down in response to the emergency for build-up of pressure, leaks, ruptures, etc.;
- Assess the spill and facility response equipment to determine if outside help is needed;
- Ensure that nearby stormwater drains are covered if there is a threat of release beyond containment areas;
- Ensure all connections between the containers and tank truck have been closed (e.g., valves and pumps);
- Direct the removal of any potentially incompatible materials from the immediate area, to the extent possible;
- Assess the spill and facility response equipment to determine if outside help is needed (Section 8, Emergency Telephone Numbers);

- Attempt to transfer material to a second compatible tank truck, if appropriate;
- Move tank truck as necessary to facilitate spill response efforts; and
- Monitor area of spill to ensure that released materials are not escaping the containment area.

Upon containment of the spill, the Emergency Coordinator will:

- Initiate actions for the clean-up and decontamination of the affected area;
- Initiate actions for the clean-up, inspection, and/or replacement of the emergency equipment used to respond to the emergency; and
- Provide for the characterization, treatment, storage, or disposal of the wastes and any contaminated debris, water, and soil generated by the spill.

Operations will not be resumed in the affected area of the facility until all facility emergency equipment listed in this Plan is present, in good condition, and ready for use.

5.5. Container Leaks and/or Spills

Hazardous waste container storage is conducted indoors in the Central Container Storage Area, the East Container Storage Area, and the Lab Depack Area. Containers may be stored outdoors in the Hazardous Roll-off Storage Area, the Dock and Van Container Storage Area, and the Bulk Loading Area (Tanker and Rail). Any wastes that Heritage can treat or store on-site may be present in containers on-site.

Any employee discovering an actual or potential container spill will:

Take immediate action in accordance with the facility Standard Operating Procedure (SOP) for managing container spills to safely prevent or contain the spill (e.g., rotate the container); and

- Notify the Supervisor on duty immediately.

The Supervisor will:

- Determine source of spill;
- Determine the type of material(s) spilled;
- Remove sources of ignition, to the extent possible;
- Remove incompatible materials from the immediate area, to the extent possible;
- Take immediate action to safely prevent or contain the spill; and
- Notify the Emergency Coordinator, as appropriate.

The Emergency Coordinator will:

- Assess the situation as described in Section 5, Implementation, to determine if the Contingency Plan should be implemented.
- Solicit assistance from a qualified employee, such as a trained Field Chemist, to assist in managing the spill response.

If the Plan is to be implemented, (as described in Section 5 upon evacuation of the facility) the Emergency Coordinator will:

- Evacuate facility following procedures set out in Section 7, Evacuation Plan;
- Assess the area for potential sources of explosion or ignition;
- Determine nature of chemical risks;
- Remove incompatible materials from the immediate area, to the extent possible;

- Order a controlled and orderly shut down of operations that would be affected by the potential or actual spill, as appropriate;
- Monitor operations which were shut down in response to the emergency situation for build-up of pressure, leaks, ruptures, etc.;
- Direct the removal of any potentially incompatible materials from the immediate area, to the extent possible;
- Assess the spill and facility response equipment to determine if outside help is needed; and
- Monitor area of spill to ensure that released materials are not escaping from the containment area.

Upon containment of the spill, the Emergency Coordinator will:

- Initiate actions for the clean-up and decontamination of the affected area;
- Initiate actions for the clean-up, inspection and/or replacement of the emergency equipment used to respond to the emergency; and
- Provide for the characterization, treatment, storage, or disposal of the wastes and any contaminated debris, water, and soil generated by the spill.

Operations will not be resumed in the affected area of the facility until all facility emergency equipment listed in this Plan is present, in good condition, and ready for use.

5.6. Toxic Vapors, Gases, or Fumes

When it is determined, either by visual observation or olfactory sensation, that an incident involving toxic vapors, gases, or fumes may exist, an employee will:

- Notify his Supervisor.

The Supervisor will:

- Conduct a cursory survey of the area;
- Evacuate the affected area, as determined necessary;
- Remove sources of ignition, if applicable;
- Notify the Emergency Coordinator, as appropriate.

The Emergency Coordinator will:

- Assess the situation as described in Section 5, Implementation, to determine if the Contingency Plan should be implemented.

If the Plan is implemented, (as described in Section 5 upon evacuation of the facility) the Emergency Coordinator will:

- Evacuate the facility, following procedures set out in Section 7, Evacuation Plan;
- Determine nature of chemical risks;
- Notify the fire department, if applicable (Section 8 Emergency Telephone Numbers)
- Assess the area for danger of explosion or ignition;
- Order a controlled and orderly shut down of operations in areas where employees would be affected by the potential or actual toxic vapors, gases, or fumes, as appropriate;
- Conduct real-time air quality monitoring for pertinent chemicals or properties to determine the need to notify or evacuate areas of the surrounding community;

- Monitor operations which were shut down in response to the emergency for build-up of pressure, leaks, ruptures, etc.;
- Take steps to contain the release of toxic vapors, gases, or fumes, such as controlled shut down of operations that are the source of the vapors, gases, or fumes;
- Remove potentially incompatible materials from the immediate area, to the extent possible
- Assess facility response equipment to determine if outside help is needed; and
- Determine if addition of chemicals would control the unwanted reactions releasing vapors, gases, or fumes.

Upon cessation of the release of the toxic vapors, gases, or fumes, the Emergency Coordinator will:

- Initiate actions for the clean-up and decontamination of the affected area;
- Initiate actions for the clean-up, inspection, and/or replacement of the emergency equipment used to respond to the emergency; and
- Provide for the characterization, treatment, storage, or disposal of the wastes and any contaminated debris, water, and soil generated by the release.

Operations will not be resumed in the affected area of the facility until all facility emergency equipment listed in this Plan is present, in good condition, and ready for use.

TABLE E-2
SUMMARY OF PERMANENT REAL-TIME MONITORS

Monitor/ Alarm Type	Activation	Alarm Type	Location
Pull Fire Alarm	Employee grabs the handle and slides it straight down in a single, firm motion.	Shrill beeping noise at facility and electronic notification to security monitoring firm.	Throughout the facility.
Smoke Fire Sensors	Alarm sounds when smoke is detected.	Shrill beeping noise and white strobe light and notification to security monitoring firm.	Throughout the facility.
Heat Detection Devices	Alarm sounds when excessive heat is detected.	Shrill beeping noise and white strobe light and notification to security monitoring firm.	Dock and Van Container Storage Area, Tanker Loading Area.

6. EVACUATION PLAN

The Emergency Response Team (ERT) will provide the Emergency Coordinator with assistance in facility evacuation. The ERT is described in Section 9 of this Plan, and the ERT training is outlined in the Personnel Training Plan. If the Emergency Coordinator determines that the facility will be evacuated, the Emergency coordinator will:

- Open all personnel and vehicle gates;
- Determine wind direction. Windsocks are located on facility grounds.
- Alert personnel of evacuation via the paging system and/or air horns. One long blast indicates a plant evacuation. An example announcement follows:

"Attention all personnel, evacuate the building through the [north and south] exit(s), closest to your location. Proceed across street or to rail car guard shack."

The statement directing personnel to specific exit(s) will be dependent upon the possibility of airborne contamination and the wind direction. In the event that the telephone paging system does not work, the facility evacuation alarm will be used.

An evacuation route plan is included in Figure E-2 in Appendix E-A.

Level I ERT members, Office staff, contractors, truck drivers, and visitors will:

- Evacuate the building as directed and close all exterior doors and the fire door between the drum storage area and office area;
- Proceed to rally points designated during the announcement; and
- Leave the designated rally point only with explicit Emergency Coordinator approval.

Level II ERT members will:

- Check all areas to ensure all personnel, contractors, truck drivers, and visitors are aware of the evacuation;
- Conduct roll-call at rally points to account for all plant personnel, office staff, contractors, truck drivers, and visitors;
- Notify Emergency Coordinator if anyone is not accounted for;
- Allow facility access to emergency personnel and vehicles only; and
- Leave the property only with explicit Emergency Coordinator approval.

Level III ERT members will:

- Conduct roll-call to account for all Level III ERT members; and
- Follow Emergency Coordinator's directions to respond to imminent or actual emergency situation.

Upon resolution of the emergency situation, the Emergency Coordinator will:

- Signal that the evacuation is over.

The Facility Environmental Compliance Manager maintains a list that specifies the names of the employees and their ERT levels.

7. EMERGENCY TELEPHONE NUMBERS

Ambulance	911/520-836-0208
Coolidge Fire Department.....	911/520-723-5311
Pinal County Sheriff's Department.....	911/520-866-6800
Coolidge Police Department	911/520-723-5311
Pinal County Local Emergency Planning Committee	911/520-868-6411
National Response Center.....	800-424-8802
Fast Med Urgent Care	520-868-0573
Casa Grande Regional Medical Center.....	520-426-6300
Arizona Department of Public Safety.....	800-641-5005
Arizona Department of Environmental Quality	602-771-2330 or 800-234-5677
Chemtrec.....	800-424-9300

8. EMERGENCY RESPONSE TEAM

8.1. Purpose

The purpose of the Emergency Response Team (ERT) is to perform rescue of injured personnel, control fires and releases, and assist outside agencies. The ERT team will respond to emergencies, accept direction of the Emergency Coordinator if the Contingency Plan is implemented, and participate in follow-up activities.

8.2. Levels of Training

Level I ERT members receive the training required by their job description (see Personnel Training Plan). The Level II and Level III responders receive additional training and take on additional responsibilities. The additional training and responsibilities of ERT responders are addressed in the Personnel Training Plan.

9. ARRANGEMENTS WITH LOCAL AUTHORITIES

Appendix E-C includes the most recent letters sent to the local police departments, fire department, hospital, contractor, and State and local emergency response teams. The following institutions may be called upon to provide emergency services:

- ADT Security Services, Inc.;
- Coolidge Police Department;
- Pinal County Sheriff's Department;
- Arizona Department of Public Safety;
- Coolidge Fire Department;
- Casa Grande Regional Medical Center;
- Fast Med Urgent Care;
- Kary Environmental Services, Inc.;
- Pinal County Local Emergency Planning Committee c/o Pinal County Office of Emergency Management; and
- Arizona Emergency Response Commission c/o Arizona Division of Emergency Management.

A copy of the current inventory list of hazardous wastes is maintained at the main access gate for use by emergency response agencies. The inventory list is updated on a weekly basis. The inventory report is updated within 24 hours of when a bulk rail car is full. The report includes a specific section of the report for the Bulk Loading Area (Tanker and Rail) that provides information concerning the location of the Bulk Loading Area (Tanker and Rail) and new waste streams as well as the specified types of hazardous waste and the volume stored.

10. EMERGENCY EQUIPMENT

Appendix E-D contains a list of emergency equipment on-site available to respond to an imminent or actual emergency situation; equipment locations are shown in Figure E-2 in Appendix E-A. Emergency equipment will be inspected weekly, as well as after use, to insure that it is cleaned and fit for its intended use. New or updated equipment may be purchased and installed as it becomes available. Equipment may be replaced with functionally equivalent equipment.

APPENDIX E-A

Figure E-1 Facility Drawing

Figure E-2 Emergency Evacuation Plan and Equipment Locations

FIGURE E-1

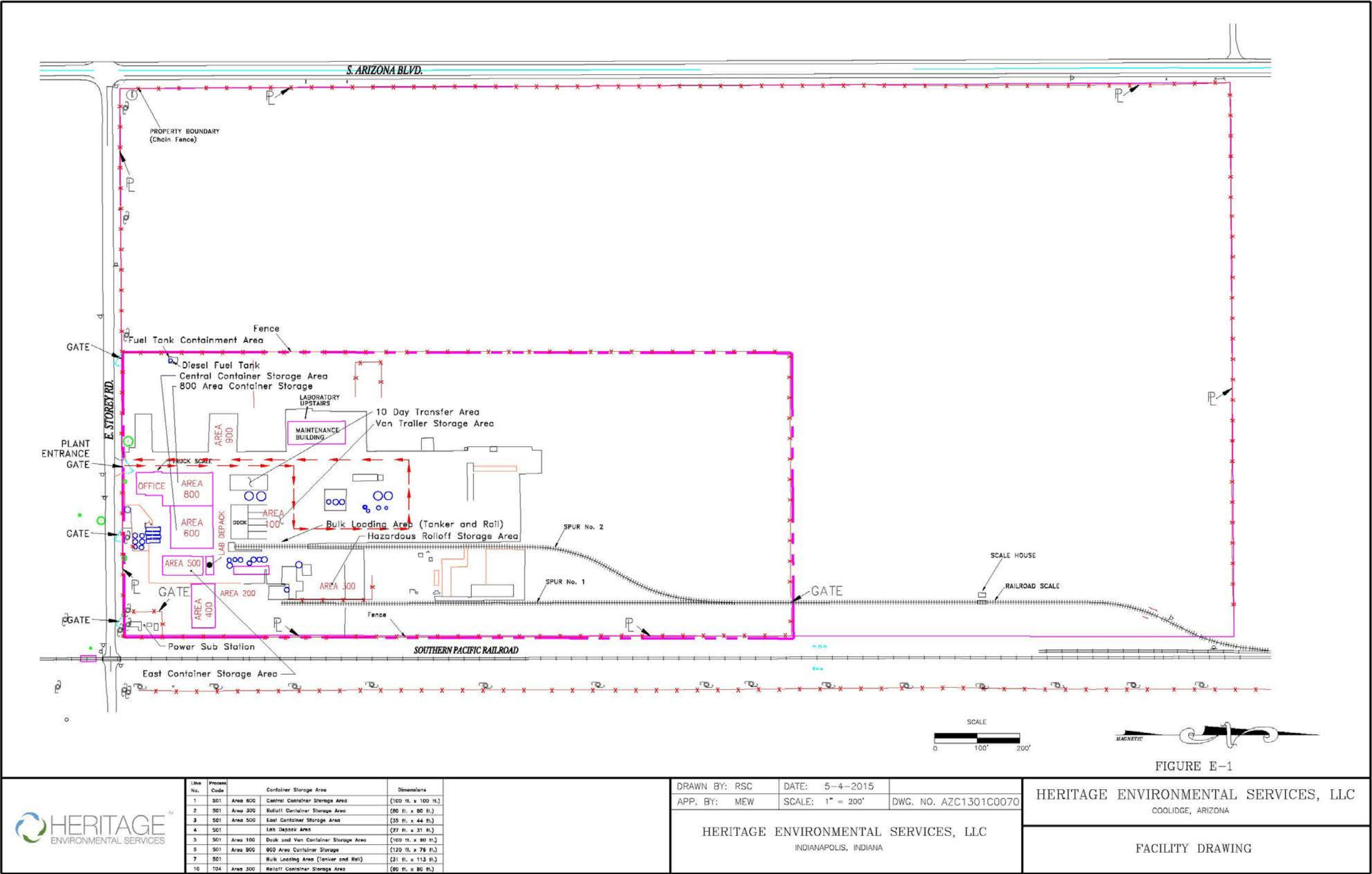
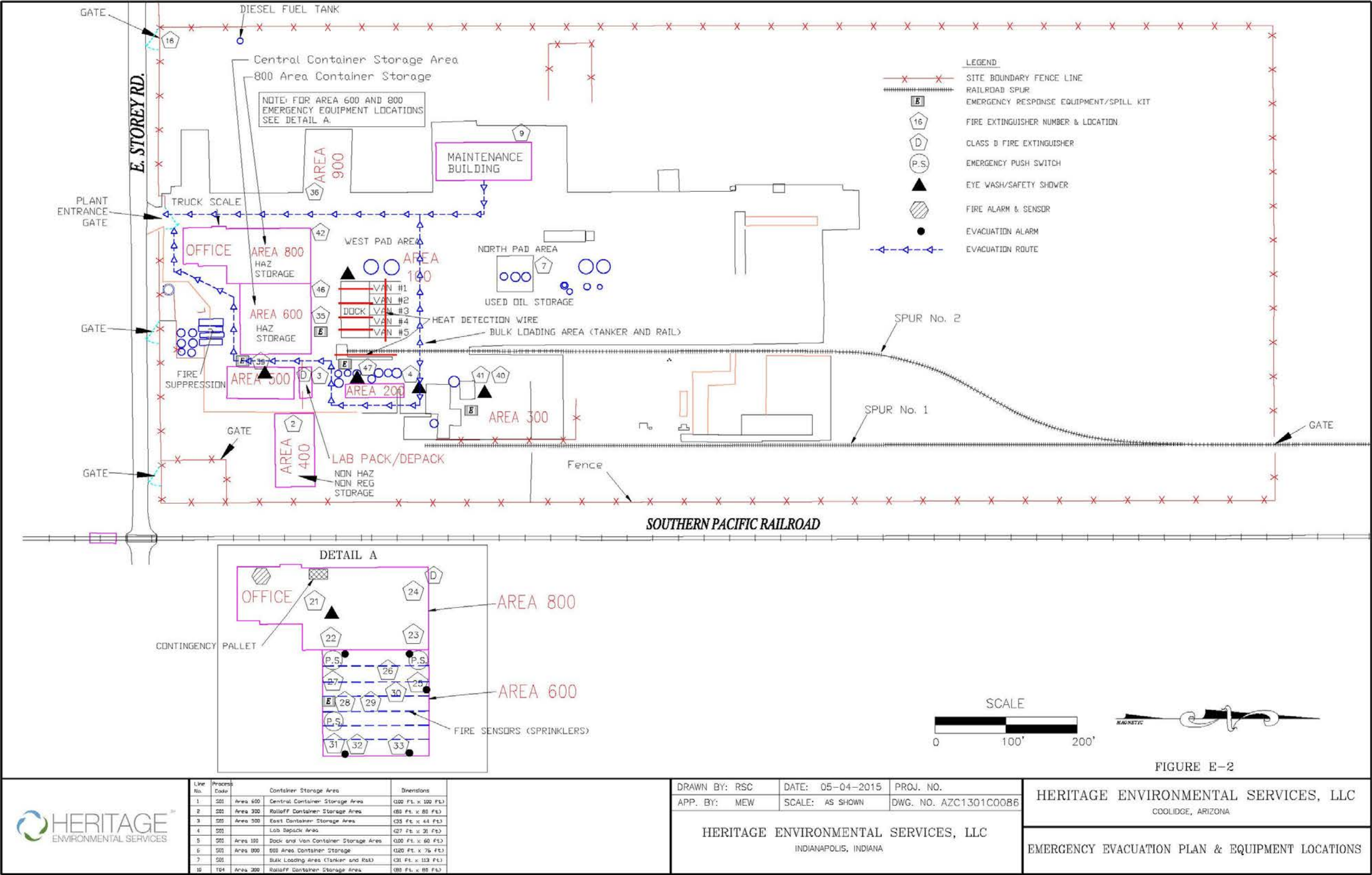


FIGURE E-2



APPENDIX E-B

LIST OF EMERGENCY COORDINATORS

LIST OF EMERGENCY COORDINATORS

Primary Contact:

Terry Baer	Area Manager
Office Phone:	(520) 723-4167 x222
Cell Phone:	(520) 280-2926
Home Phone:	(520) 836-5789
Home Address:	297 W. Hawthorne Drive Casa Grande, Arizona 85122

Alternate Contact(s):

Kenneth Payne	Facility Supervisor
Office Phone:	(520) 723-4167 x228
Cell Phone:	(520) 258-2094
Alternate Phone:	(520) 510-3061
Home Address:	22347 E. Villa del Palo Queen Creek, Arizona 85142
Amy Vasquez	Regional Compliance Manager
Office Phone:	(520) 723-4167 x223
Cell Phone:	(602) 293-7189
Alternate Phone:	(480) 540-2754
Home Address:	6679 S. Pewter Way Chandler, Arizona 85249

Arizona Department of Environmental Quality (ADEQ) Emergency Response Duty Office:

1-800-234-5677

APPENDIX E-C

ARRANGEMENTS WITH LOCAL AUTHORITIES

The following pages include copies of the most recent letters sent to the local police departments, fire department, hospital, contractor, and State and local emergency response teams. These institutions may be called upon to provide emergency response services:

- ADT Security Services, Inc. (Contact = Wendi Fuller);
- Coolidge Police Department (Communication Department);
- Pinal County Sheriff's Department (Sheriff Paul Babeu);
- Arizona Department of Public Safety
- Coolidge Fire Department (Fire Chief Mickey McHugh);
- Casa Grande Regional Medical Center;
- Fast Med Urgent Care (Dr. Erik Cohen);
- Kary Environmental Services, Inc. (Jeff Kary);
- Pinal County Local Emergency Planning Committee c/o Pinal County Office of Emergency Management (Pete Weaver); and
- Arizona Emergency Response Commission c/o Arizona Division of Emergency Management.



VIA CERTIFIED MAIL - RETURN RECEIPT
ARTICLE NUMBER: 7010 1670 0000 5722 8866

January 24, 2014

Dr. Erik Cohen
Fast Med Urgent Care
495 N. Pinal Parkway, Suite 106
Florence, AZ 85132

Re: Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, Arizona 85128
Contingency Plan

Dear Dr. Cohen:

The purpose of this letter is to provide your organization with a revised Contingency Plan and request your assistance in arranging coordination of emergency services in the event of a chemical or waste incident involving the implementation of the Contingency Plan at Heritage Environmental Services, LLC ("Heritage").

A copy of our most recent version of the Heritage Contingency Plan is enclosed. Heritage has updated the list of emergency coordinators and the local authorities who may be called upon to provide emergency services. The Contingency Plan outlines our emergency response procedures. Heritage is required by federal and state regulations as well as our RCRA Part B permit issued by the Arizona Department of Environmental Quality to provide you with an up-to-date copy of the Contingency Plan. The permit and federal and state regulations also require Heritage to document arrangements made with the local authorities who may be called upon during an emergency at our facility.

If you have not done so already, we invite you and other appropriate representatives in your organization to tour our facility so that we may familiarize your personnel with the following aspects of our facility:

- overall layout of the facility and its operations, including evacuation routes,
- areas where chemicals and wastes may be located,
- properties of the chemicals and wastes handled and associated hazards.

In addition, Heritage requests that your organization be available to provide health care services in the event that such assistance is necessary during or after an emergency event at our facility. A reply form and a self-addressed, stamped envelope are enclosed. Please indicate whether or not this arrangement is acceptable to your organization.

www.heritage-enviro.com

13MW4067_I18

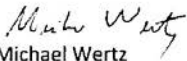
PEOPLE PROVIDING SOLUTIONS

Dr. Erik Cohen
January 24, 2014
Page 2

Thank you for your cooperation in this matter. Please contact Amy Vasquez, our Regional Compliance Manager, at (520) 723-4167 or me at (317) 486-2778 if you wish to schedule a site tour and/or if you have any questions regarding this letter or the information contained in the Contingency Plan.

Yours truly,

HERITAGE ENVIRONMENTAL SERVICES, LLC


Michael Wertz
Program Manager, Corporate Compliance

Enclosure

13MW4067_I18

www.heritage-enviro.com

PEOPLE PROVIDING SOLUTIONS

**EMERGENCY SERVICES ORGANIZATION
FAST MED URGENT CARE**

Please check one space and return using the enclosed self-addressed, stamped envelope.

_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and will serve as an emergency health care provider in the event these services are required.

_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and refuse to make arrangements to familiarize my firm (or a designated individual) in the event emergency health care services are required.

_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and will serve as an emergency provider for health care services in the event these services are required. In addition, I desire to schedule a site visit to become familiar with the facility. I will be contacting Amy Vasquez of Heritage Environmental Services, LLC at (502) 723-4167 to schedule a site visit and review the facility's emergency preparedness program.

Signature

Printed Name and title

Date

Please return to: Amy Vazquez
Regional Compliance Manager
Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, AZ 85128

13MW4067_118

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 Restricted Delivery Fee (Endorsement Required)
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Dr. Erik Cohen
 Fast Med Urgent Care
 495 N. Pinal Parkway, Suite 106
 Florence, AZ 85132

PS Form 3811, February 2004

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery 1/27/14</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>
<p>1. Article Addressed to:</p> <p>Dr. Erik Cohen Fast Med Urgent Care 495 N. Pinal Parkway, Suite 106 Florence, AZ 85132</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Transfer from service label)</p> <p>7010 1670 0000 5722 8866</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540



VIA CERTIFIED MAIL -RETURN RECEIPT
ARTICLE NUMBER: 7010 1670 0000 5722 8873

January 24, 2014

Case Grande Regional Medical Center
1800 East Florence Boulevard
Casa Grande, AZ 85122

Re: Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, Arizona 85128
Contingency Plan

To Whom It May Concern:

The purpose of this letter is to provide your organization with a revised Contingency Plan and request your assistance in arranging coordination of emergency services in the event of a chemical or waste incident involving the implementation of the Contingency Plan at Heritage Environmental Services, LLC ("Heritage").

A copy of our most recent version of the Heritage Contingency Plan is enclosed. Heritage has updated the list of emergency coordinators and the local authorities who may be called upon to provide emergency services. The Contingency Plan outlines our emergency response procedures. Heritage is required by federal and state regulations as well as our RCRA Part B permit issued by the Arizona Department of Environmental Quality to provide you with an up-to-date copy of the Contingency Plan. The permit and federal and state regulations also require Heritage to document arrangements made with the local authorities who may be called upon during an emergency at our facility.

If you have not done so already, we invite you and other appropriate representatives in your organization to tour our facility so that we may familiarize your personnel with the following aspects of our facility:

- overall layout of the facility and its operations, including evacuation routes,
- areas where chemicals and wastes may be located,
- properties of the chemicals and wastes handled and associated hazards.

In addition, Heritage requests that your organization be available to provide health care services in the event that such assistance is necessary during or after an emergency event at our facility. A reply form and a self-addressed, stamped envelope are enclosed. Please indicate whether or not this arrangement is acceptable to your organization.

13MW4067_118

www.heritage-enviro.com

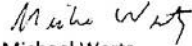
PEOPLE PROVIDING SOLUTIONS

Casa Grande Regional Medical Center
January 24, 2014
Page 2

Thank you for your cooperation in this matter. Please contact Amy Vasquez, our Regional Compliance Manager, at (520) 723-4167 or me at (317) 486-2778 if you wish to schedule a site tour and/or if you have any questions regarding this letter or the information contained in the Contingency Plan.

Yours truly,

HERITAGE ENVIRONMENTAL SERVICES, LLC



Michael Wertz
Program Manager, Corporate Compliance

Enclosure

13MW4067_J18

www.heritage-enviro.com

PEOPLE PROVIDING SOLUTIONS

**EMERGENCY SERVICES ORGANIZATION
CASA GRANDE REGIONAL MEDICAL CENTER**

Please check one space and return using the enclosed self-addressed, stamped envelope.

- _____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and will serve as an emergency health care provider in the event these services are required.
- _____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and refuse to make arrangements to familiarize my firm (or a designated individual) in the event emergency health care services are required.
- _____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and will serve as an emergency provider for health care services in the event these services are required. In addition, I desire to schedule a site visit to become familiar with the facility. I will be contacting Amy Vasquez of Heritage Environmental Services, LLC at (502) 723-4167 to schedule a site visit and review the facility's emergency preparedness program.

Signature

Printed Name and title

Date

Please return to: Amy Vasquez
Regional Compliance Manager
Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, AZ 85128

13MW4067_I18

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 Restricted Delivery Fee (Endorsement Required)
 Total 8.91

Postmark
 Hang
 JAN 24 2014
 INDOLE PARK FLETCHER SP 46241
 USPS

Sent to Case Grande Regional Medical Center
 Street 1800 East Florence Boulevard
 City, S Casa Grande, AZ 85122

PS Form 3811, February 2004 Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <i>[Signature]</i> <input type="checkbox"/> Agent</p> <p>B. Received by (Printed Name) <i>Carol Durant</i></p> <p>C. Date of Delivery <i>1-28-14</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Case Grande Regional Medical Center 1800 East Florence Boulevard Casa Grande, AZ 85122</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7010 1670 0000 5722 8873</p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102505-02-M-1540</p>	



7901 West Morris Street
Indianapolis, Indiana 46231

VIA CERTIFIED MAIL - RETURN RECEIPT
ARTICLE NUMBER: 7010 1670 0000 5722 8880

January 24, 2014

Sheriff Paul Babeu
Pinal County Sheriff's Office
971 Jason Lopez Circle, Building C
Florence, AZ 85132

Re: **Heritage Environmental Services, LLC**
284 East Storey Road
Coolidge, Arizona 85128
Contingency Plan

Dear Sheriff Babeu:

The purpose of this letter is to provide your organization with a revised Contingency Plan and request your assistance in arranging coordination of emergency services in the event of a chemical or waste incident involving the implementation of the Contingency Plan at Heritage Environmental Services, LLC ("Heritage").

A copy of our most recent version of the Heritage Contingency Plan is enclosed. Heritage has updated the list of emergency coordinators and the local authorities who may be called upon to provide emergency services. The Contingency Plan outlines our emergency response procedures. Heritage is required by federal and state regulations as well as our RCRA Part B permit issued by the Arizona Department of Environmental Quality to provide you with an up-to-date copy of the Contingency Plan. The permit and federal and state regulations also require Heritage to document arrangements made with the local authorities who may be called upon during an emergency at our facility.

If you have not done so already, we invite you and other appropriate representatives in your organization to tour our facility so that we may familiarize your personnel with the following aspects of our facility:

- overall layout of the facility and its operations, including evacuation routes,
- areas where chemicals and wastes may be located,
- properties of the chemicals and wastes handled and associated hazards.

In addition, Heritage requests that your organization be available to provide police-related services in the event that such assistance is necessary during or after an emergency event at our facility. A reply form and a self-addressed, stamped envelope are enclosed. Please indicate whether or not this arrangement is acceptable to your organization.

www.heritage-enviro.com

13MW4067_I18

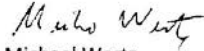
PEOPLE PROVIDING SOLUTIONS

Sheriff Paul Babeu
January 24, 2014
Page 2

Thank you for your cooperation in this matter. Please contact Amy Vasquez, our Regional Compliance Manager, at (520) 723-4167 or me at (317) 486-2778 if you wish to schedule a site tour and/or if you have any questions regarding this letter or the information contained in the Contingency Plan.

Yours truly,

HERITAGE ENVIRONMENTAL SERVICES, LLC



Michael Wertz
Program Manager, Corporate Compliance

Enclosure

13MW4067_I18

www.heritage-enviro.com

PEOPLE PROVIDING SOLUTIONS

**EMERGENCY SERVICES ORGANIZATION
PINAL COUNTY SHERIFF'S DEPARTMENT**

Please check one space and return using the enclosed self-addressed, stamped envelope.

_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and will provide police-related services in the event these services are required.

_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and refuse to make arrangements to familiarize my firm (or a designated individual) in the event police-related services are required.

_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and will serve as the police authority in the event these services are required. In addition, I desire to schedule a site visit to become familiar with the facility. I will be contacting Amy Vasquez of Heritage Environmental Services, LLC at (502) 723-4167 to schedule a site visit and review the facility's emergency preparedness program.

Signature

Printed Name and title

Date

Please return to: Amy Vazquez
Regional Compliance Manager
Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, AZ 85128

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Sent to Sheriff Paul Babeu
Street, Apt. or PO Box Pinal County Sheriff's Office
City, State 971 Jason Lopez Circle, Building C
Florence, AZ 85132

PS Form 3811, February 2004

7010 1670 0000 5722 8880

INDY'S PARK FLETCHER BR 102595-02 M-1540
JAN 24 2014
Here
USPS

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none">■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.■ Print your name and address on the reverse so that we can return the card to you.■ Attach this card to the back of the mailpiece, or on the front if space permits.	A. Signature X <i>Alissa Lopez</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee
1. Article Addressed to: Sheriff Paul Babeu Pinal County Sheriff's Office 971 Jason Lopez Circle, Building C Florence, AZ 85132	B. Received by (Printed Name) <i>Alissa Lopez</i> C. Date of Delivery <i>1/28/14</i>
	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
	3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes
2. Article Number (Transfer from service label)	7010 1670 0000 5722 8880
PS Form 3811, February 2004	Domestic Return Receipt 102595-02 M-1540



7901 West Morris Street
Indianapolis, Indiana 46231

VIA CERTIFIED MAIL - RETURN RECEIPT
ARTICLE NUMBER: 7010 1670 0000 5722 8897

January 24, 2014

Mr. Jeff Kary
Kary Environmental Services, Inc.
641 S. Drew Street
Mesa, AZ 85210

Re: Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, Arizona 85128
Contingency Plan

Dear Mr. Kary:

The purpose of this letter is to provide your organization with a revised Contingency Plan and request your assistance in arranging coordination of emergency services in the event of a chemical or waste incident involving the implementation of the Contingency Plan at Heritage Environmental Services, LLC ("Heritage").

A copy of our most recent version of the Heritage Contingency Plan is enclosed. Heritage has updated the list of emergency coordinators and the local authorities who may be called upon to provide emergency services. The Contingency Plan outlines our emergency response procedures. Heritage is required by federal and state regulations as well as our RCRA Part B permit issued by the Arizona Department of Environmental Quality to provide you with an up-to-date copy of the Contingency Plan. The permit and federal and state regulations also require Heritage to document arrangements made with the local authorities who may be called upon during an emergency at our facility.

If you have not done so already, we invite you and other appropriate representatives in your organization to tour our facility so that we may familiarize your personnel with the following aspects of our facility:

- overall layout of the facility and its operations, including evacuation routes,
- areas where chemicals and wastes may be located,
- properties of the chemicals and wastes handled and associated hazards.

In addition, Heritage requests that your organization be available to provide spill response and related services in the event that such assistance is necessary during or after an emergency event at our facility. A reply form and a self-addressed, stamped envelope are enclosed. Please indicate whether or not this arrangement is acceptable to your organization.

13MW4067_I18

www.heritage-enviro.com

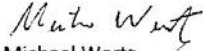
PEOPLE PROVIDING SOLUTIONS

Mr. Jeff Kary
January 24, 2014
Page 2

Thank you for your cooperation in this matter. Please contact Amy Vasquez, our Regional Compliance Manager, at (520) 723-4167 or me at (317) 486-2778 if you wish to schedule a site tour and/or if you have any questions regarding this letter or the information contained in the Contingency Plan.

Yours truly,

HERITAGE ENVIRONMENTAL SERVICES, LLC



Michael Wertz
Program Manager, Corporate Compliance

Enclosure

13MW4067_I18

www.heritage-enviro.com

PEOPLE PROVIDING SOLUTIONS

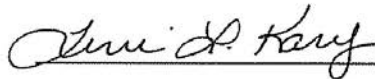
EMERGENCY SERVICES ORGANIZATION
KARY ENVIRONMENTAL SERVICES, INC.

Please check one space and return using the enclosed self-addressed, stamped envelope.

_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and will serve as spill response provider in the event these services are required.

_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and refuse to make arrangements to familiarize my firm (or a designated individual) in the event spill response and related services are required.

X_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and will provide spill response and related services in the event these services are required. In addition, I desire to schedule a site visit to become familiar with the facility. I will be contacting Amy Vasquez of Heritage Environmental Services, LLC at (502) 723-4167 to schedule a site visit and review the facility's emergency preparedness program.



Signature

Terri L. Kary, Secretary of the Corporation

Printed Name and title

January 28, 2014

Date

Please return to: Amy Vasquez
Regional Compliance Manager
Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, AZ 85128

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Return Receipt Fee (Endorsement Required) 2.53
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees 8.97

Sent to: Mr. Jeff Kary
Kary Environmental Services, Inc.
641 S. Drew Street
Mesa, AZ 85210

7010 1670 0000 5722 8897

INDPT'S PARK FIELD OFFICE
JAN 2 2008

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none">Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.Print your name and address on the reverse so that we can return the card to you.Attach this card to the back of the mailpiece, or on the front if space permits.	A. Signature <input checked="" type="checkbox"/> X <u>[Signature]</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee
1. Article Addressed to: Mr. Jeff Kary Kary Environmental Services, Inc. 641 S. Drew Street Mesa, AZ 85210	B. Received by (Printed Name) <u>[Signature]</u> C. Date of Delivery D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
2. Article Number (Transfer from service label) <u>7010 1670 0000 5722 8897</u>	3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540



7901 West Morris Street
Indianapolis, Indiana 46231

VIA CERTIFIED MAIL - RETURN RECEIPT
ARTICLE NUMBER: 7010 1670 0000 5722 8903

January 24, 2014

Fire Chief Mickey McHugh
City of Coolidge Fire Department
103 W. Pinkley Avenue
Coolidge, AZ 85128

Re: Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, Arizona 85128
Contingency Plan

Dear Fire Chief McHugh:

The purpose of this letter is to provide your organization with a revised Contingency Plan and request your assistance in arranging coordination of emergency services in the event of a chemical or waste incident involving the implementation of the Contingency Plan at Heritage Environmental Services, LLC ("Heritage").

A copy of our most recent version of the Heritage Contingency Plan is enclosed. Heritage has updated the list of emergency coordinators and the local authorities who may be called upon to provide emergency services. The Contingency Plan outlines our emergency response procedures. Heritage is required by federal and state regulations as well as our RCRA Part B permit issued by the Arizona Department of Environmental Quality to provide you with an up-to-date copy of the Contingency Plan. The permit and federal and state regulations also require Heritage to document arrangements made with the local authorities who may be called upon during an emergency at our facility.

If you have not done so already, we invite you and other appropriate representatives in your organization to tour our facility so that we may familiarize your personnel with the following aspects of our facility:

- overall layout of the facility and its operations, including evacuation routes,
- areas where chemicals and wastes may be located,
- properties of the chemicals and wastes handled and associated hazards.

In addition, Heritage requests that your organization be available to provide emergency fire response in the event that such assistance is necessary during or after an emergency event at our facility. A reply form and a self-addressed, stamped envelope are enclosed. Please indicate whether or not this arrangement is acceptable to your organization.

13MW4067_I18

www.heritage-enviro.com

PEOPLE PROVIDING SOLUTIONS

Fire Chief Mickey McHugh

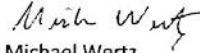
January 24, 2014

Page 2

Thank you for your cooperation in this matter. Please contact Amy Vasquez, our Regional Compliance Manager, at (520) 723-4167 or me at (317) 486-2778 if you wish to schedule a site tour and/or if you have any questions regarding this letter or the information contained in the Contingency Plan.

Yours truly,

HERITAGE ENVIRONMENTAL SERVICES, LLC



Michael Wertz
Program Manager, Corporate Compliance

Enclosure

13MW4067_118

www.heritage-enviro.com

PEOPLE PROVIDING SOLUTIONS

EMERGENCY SERVICES ORGANIZATION
CITY OF COOLIDGE FIRE DEPARTMENT

Please check one space and return using the enclosed self-addressed, stamped envelope.

_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and will serve as fire responder in the event these services are required.

_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and refuse to make arrangements to familiarize my firm (or a designated individual) in the event emergency fire services are required.

✓ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and will provide emergency fire response in the event these services are required. In addition, I desire to schedule a site visit to become familiar with the facility. I will be contacting Amy Vasquez of Heritage Environmental Services, LLC at (502) 723-4167 to schedule a site visit and review the facility's emergency preparedness program.

M. McHugh

Signature

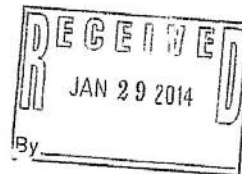
M. McHugh - FIRE CHIEF

Printed Name and title

1-27-14

Date

Please return to: Amy Vasquez
Regional Compliance Manager
Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, AZ 85128



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Sent to: Fire Chief Mickey McHugh
 City of Coolidge Fire Department
 103 W. Pinkley Avenue
 Coolidge, AZ 85128

PS Form 3811, February 2004

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<p>1. Article Addressed to:</p> <p>Fire Chief Mickey McHugh City of Coolidge Fire Department 103 W. Pinkley Avenue Coolidge, AZ 85128</p>	<p>3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
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PS Form 3811, February 2004

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102595-02-M-1540



7901 West Morris Street
Indianapolis, Indiana 46231

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ARTICLE NUMBER: 7010 1670 0000 5722 8910

January 24, 2014

Communications Department
City of Coolidge Police Department
110 W. Central Avenue
Coolidge, AZ 85128

Re: Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, Arizona 85128
Contingency Plan

To Whom It May Concern:

The purpose of this letter is to provide your organization with a revised Contingency Plan and request your assistance in arranging coordination of emergency services in the event of a chemical or waste incident involving the implementation of the Contingency Plan at Heritage Environmental Services, LLC ("Heritage").

A copy of our most recent version of the Heritage Contingency Plan is enclosed. Heritage has updated the list of emergency coordinators and the local authorities who may be called upon to provide emergency services. The Contingency Plan outlines our emergency response procedures. Heritage is required by federal and state regulations as well as our RCRA Part B permit issued by the Arizona Department of Environmental Quality to provide you with an up-to-date copy of the Contingency Plan. The permit and federal and state regulations also require Heritage to document arrangements made with the local authorities who may be called upon during an emergency at our facility.

If you have not done so already, we invite you and other appropriate representatives in your organization to tour our facility so that we may familiarize your personnel with the following aspects of our facility:

- overall layout of the facility and its operations, including evacuation routes,
- areas where chemicals and wastes may be located,
- properties of the chemicals and wastes handled and associated hazards.

In addition, Heritage requests that your organization be available to provide police-related services in the event that such assistance is necessary during or after an emergency event at our facility. A reply form and a self-addressed, stamped envelope are enclosed. Please indicate whether or not this arrangement is acceptable to your organization.

13MW4067_I18

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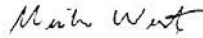
PEOPLE PROVIDING SOLUTIONS

City of Coolidge Police Department
January 24, 2014
Page 2

Thank you for your cooperation in this matter. Please contact Amy Vasquez, our Regional Compliance Manager, at (520) 723-4167 or me at (317) 486-2778 if you wish to schedule a site tour and/or if you have any questions regarding this letter or the information contained in the Contingency Plan.

Yours truly,

HERITAGE ENVIRONMENTAL SERVICES, LLC



Michael Wertz
Program Manager, Corporate Compliance

Enclosure

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PEOPLE PROVIDING SOLUTIONS

**EMERGENCY SERVICES ORGANIZATION
CITY OF COOLIDGE POLICE DEPARTMENT**

Please check one space and return using the enclosed self-addressed, stamped envelope.

_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and will provide police-related services in the event these services are required.

_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and refuse to make arrangements to familiarize my firm (or a designated individual) in the event police-related services are required.

_____ I have received the Heritage Environmental Services, LLC, Coolidge, Arizona Contingency Plan and will serve as the police authority in the event these services are required. In addition, I desire to schedule a site visit to become familiar with the facility. I will be contacting Amy Vasquez of Heritage Environmental Services, LLC at (502) 723-4167 to schedule a site visit and review the facility's emergency preparedness program.

Signature

Printed Name and title

Date

Please return to: Amy Vasquez
Regional Compliance Manager
Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, AZ 85128

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City of Coolidge Police Department
110 W. Central Avenue
Coolidge, AZ 85128

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1. Article Addressed to: Communications Department City of Coolidge Police Department 110 W. Central Avenue Coolidge, AZ 85128	3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
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VIA CERTIFIED MAIL - RETURN RECEIPT
ARTICLE NUMBER: 7010 1670 0000 5722 8927

January 24, 2014

Arizona Emergency Response Commission
c/o Arizona Division of Emergency Management
5636 East McDowell Road
Phoenix, AZ 85002

Re: Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, Arizona 85128
Contingency Plan

To Whom It May Concern:

The purpose of this letter is to provide your organization with a revised Contingency Plan and request your assistance in arranging coordination of emergency services in the event of a chemical or waste incident involving the implementation of the Contingency Plan at Heritage Environmental Services, LLC ("Heritage").

A copy of our most recent version of the Heritage Contingency Plan is enclosed. Heritage has updated the list of emergency coordinators and the local authorities who may be called upon to provide emergency services. The Contingency Plan outlines our emergency response procedures.

If you have not done so already, we invite you and other appropriate representatives in your organization to tour our facility so that we may familiarize your personnel with the following aspects of our facility:

- overall layout of the facility and its operations, including evacuation routes,
- areas where chemicals and wastes may be located,
- properties of the chemicals and wastes handled and associated hazards.

Thank you for your cooperation in this matter. Please contact Amy Vasquez, our Regional Compliance Manager, at (520) 723-4167 or me at (317) 486-2778 if you wish to schedule a site tour and/or if you have any questions regarding this letter or the information contained in the Contingency Plan.

Yours truly,

HERITAGE ENVIRONMENTAL SERVICES, LLC


Michael Wertz
Program Manager, Corporate Compliance

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 c/o AZ Division of Emergency Mgmt.
 5636 East McDowell Road
 Phoenix, AZ 85002

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<p>1. Article Addressed to:</p> <p>AZ Emergency Response Commission c/o AZ Division of Emergency Mgmt. 5636 East McDowell Road Phoenix, AZ 85002</p>	<p>3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
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VIA CERTIFIED MAIL -RETURN RECEIPT
ARTICLE NUMBER: 7010 1670 0000 5722 8934

January 24, 2014

Mr. Pete Weaver, Director
Pinal County Office of Emergency Management
31 N. Pinal Street, Building F
Florence, AZ 85132

Re: Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, Arizona 85128
Contingency Plan

Dear Mr. Weaver:

The purpose of this letter is to provide your organization with a revised Contingency Plan and request your assistance in arranging coordination of emergency services in the event of a chemical or waste incident involving the implementation of the Contingency Plan at Heritage Environmental Services, LLC ("Heritage").

A copy of our most recent version of the Heritage Contingency Plan is enclosed. Heritage has updated the list of emergency coordinators and the local authorities who may be called upon to provide emergency services. The Contingency Plan outlines our emergency response procedures.

If you have not done so already, we invite you and other appropriate representatives in your organization to tour our facility so that we may familiarize your personnel with the following aspects of our facility:

- overall layout of the facility and its operations, including evacuation routes,
- areas where chemicals and wastes may be located,
- properties of the chemicals and wastes handled and associated hazards.

Thank you for your cooperation in this matter. Please contact Amy Vasquez, our Regional Compliance Manager, at (520) 723-4167 or me at (317) 486-2778 if you wish to schedule a site tour and/or if you have any questions regarding this letter or the information contained in the Contingency Plan.

Yours truly,

HERITAGE ENVIRONMENTAL SERVICES, LLC

Michael Wertz
Program Manager, Corporate Compliance

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Pinal County Office of Emergency Mgmt.
31 N. Pinal Street, Building F
Florence, AZ 85132

PG For: _____

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1. Article Addressed to: Mr. Pete Weaver, Director Pinal County Office of Emergency Mgmt. 31 N. Pinal Street, Building F Florence, AZ 85132		3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
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VIA CERTIFIED MAIL - RETURN RECEIPT
ARTICLE NUMBER: 7010 1670 0000 5722 8941

January 24, 2014

Arizona Department of Public Safety
2102 W. Encanto Boulevard
Phoenix, AZ 85009-2847

Re: Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, Arizona 85128
Contingency Plan

To Whom It May Concern:

The purpose of this letter is to provide your organization with a revised Contingency Plan and request your assistance in arranging coordination of emergency services in the event of a chemical or waste incident involving the implementation of the Contingency Plan at Heritage Environmental Services, LLC ("Heritage").

A copy of our most recent version of the Heritage Contingency Plan is enclosed. Heritage has updated the list of emergency coordinators and the local authorities who may be called upon to provide emergency services. The Contingency Plan outlines our emergency response procedures.

If you have not done so already, we invite you and other appropriate representatives in your organization to tour our facility so that we may familiarize your personnel with the following aspects of our facility:

- overall layout of the facility and its operations, including evacuation routes,
- areas where chemicals and wastes may be located,
- properties of the chemicals and wastes handled and associated hazards.

Thank you for your cooperation in this matter. Please contact Amy Vasquez, our Regional Compliance Manager, at (520) 723-4167 or me at (317) 486-2778 if you wish to schedule a site tour and/or if you have any questions regarding this letter or the information contained in the Contingency Plan.

Yours truly,

HERITAGE ENVIRONMENTAL SERVICES, LLC

Michael Wertz
Program Manager, Corporate Compliance

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INDEPENDENCE, AR 72427

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Street or PO Box
City, State
PS Form 3811, February 2004

Arizona Department of Public Safety
2102 W. Encanto Boulevard
Phoenix, AZ 85009-2847

uctions

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1. Article Addressed to: Arizona Department of Public Safety 2102 W. Encanto Boulevard Phoenix, AZ 85009-2847	B. Received by (Printed Name) Keith Robertson C. Date of Delivery #709227
2. Article Number (Transfer from service label) 7010 1670 0000 5722 8941	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
	3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

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VIA CERTIFIED MAIL - RETURN RECEIPT
ARTICLE NUMBER: 7010 1670 0000 5722 8958

January 24, 2014

Mr. David W. Barrett
Tyco Integrated Security
3011 S. 52nd Street, Suite 115
Tempe, AZ 85282

Re: Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, Arizona 85128
Contingency Plan

Dear Ms. Fuller:

The purpose of this letter is to provide your organization with a revised Contingency Plan for the Heritage Environmental Services, LLC ("Heritage") facility in Coolidge, Arizona. Heritage recently completed a revision of the Contingency Plan by updating the list of emergency coordinators and the local authorities who may be called upon to provide emergency services. The Contingency Plan outlines our emergency response procedures.

Tyco Integrated Security provides remote detection and alarms for our facility that includes fire detection in many areas of the facility as well as motion detection devices to indicate the presence of intruders in areas of our facility. We provide this Contingency Plan to Heritage employees serving as emergency coordinators (See Appendix E-B), the fire department (City of Coolidge), the county sheriff's department (Pinal County), health care service providers, private emergency response contractor(s), and governmental authorities typically overseeing emergency response activities. The purpose of the Plan is to provide a guideline for response to a facility emergency that includes a fire, explosion, or release of hazardous waste. In the event of an emergency that is detected by the facility detection devices, Tyco Integrated Security will continue to contact facility representatives, and depending on the type of alarm indicated, the fire department or sheriff's department. Heritage is providing a courtesy copy of this Contingency Plan to supplement your current emergency response information for our facility.

Thank you for your cooperation in this matter. Please contact Amy Vasquez, our Regional Compliance Manager, at (520) 723-4167 or me at (317) 486-2778 if you have any questions regarding this letter or the information contained in the Contingency Plan.

Yours truly,

HERITAGE ENVIRONMENTAL SERVICES, LLC

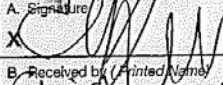
Michael Wertz
Program Manager, Corporate Compliance

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Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	
Total	8.97
Sent to	Mr. David W. Barrett
Street or PO Box	Tyco Integrated Security
City	3011 S. 52 nd Street, Suite 115
PS Form	Tempe, AZ 85282

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none">■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.■ Print your name and address on the reverse so that we can return the card to you.■ Attach this card to the back of the mailpiece, or on the front if space permits.	A. Signature  <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee
1. Article Addressed to: Mr. David W. Barrett Tyco Integrated Security 3011 S. 52 nd Street, Suite 115 Tempe, AZ 85282	B. Received by (Printed Name) <u>David W. Barrett</u> C. Date of Delivery <u>04/04/04</u>
2. Article Number (Transfer from service label)	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
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	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

APPENDIX E-D
LIST OF EMERGENCY EQUIPMENT

UNIT	LOCATION	DESCRIPTION
Eye Wash and Safety Shower	Dock and Van Container Storage Area	Flush eye in the event of foreign substance in contact with eye.
Eye Wash and Safety Shower (2)	200 Area	Flush eye in the event of foreign substance in contact with eye.
Eye Wash and Safety Shower	800 Area	Flush eye in the event of foreign substance in contact with eye.
Eye Wash and Safety Shower	East of Central Storage Area	Flush eye in the event of foreign substance in contact with eye.
Eye Wash and Safety Shower, portable (2)	Located at facility as needed	Flush eye in the event of foreign substance in contact with eye.
Class D Fire Extinguisher	800 Area	Extinguish metal fires (D-type extinguishers).
Class D Fire Extinguisher	Depack Area	Extinguish metal fires (D-type extinguishers).
Fire extinguisher	Central Storage Area	Extinguish fires (ABC- and CO ₂ -type extinguishers).
Fire extinguisher	East Storage Area	Extinguish fires (ABC- and CO ₂ -type extinguishers).
Fire extinguisher	Hazardous Roll-off Storage Area	Extinguish fires (ABC- and CO ₂ -type extinguishers).
Fire extinguisher	Dock and Van Container Storage Area	Extinguish fires (ABC- and CO ₂ -type extinguishers).
Spill kit (Cabinet, absorbent, hand tools, chemical resistant gloves and suit)	Central Storage Area	Absorbent to absorb liquid materials; chemical-resistant gloves and suit to protect personnel from contacting various materials; hand tools to open and close containers.
Spill kit (Cabinet, absorbent, hand tools, chemical resistant gloves and suit)	East Storage Area	Same as spill kit above.
Spill kit (overpack drum, absorbent, hand tools, chemical resistant gloves and suit)	Hazardous Roll-off Storage Area	Same as spill kit above.
Spill kit (Cabinet, absorbent, hand tools, chemical resistant gloves and suit)	Dock and Van Container Storage Area	Same as spill kit above.
Spill kit (Cabinet, absorbent, hand tools, chemical resistant gloves and suit)	Bulk Loading Area (Tanker and Rail)	Same as spill kit above.
Overpack Containers	Dock and Maintenance Building	Contain leaking containers.
Direct reading instruments (infrared thermometer, OVA)	Environmental Compliance Manager's Office	Monitor container temperature, volatile organic compounds.
Foam Drums	West Non-Hazardous Storage Area	Foam used as fire extinguishing material.
Contingency Plan Pallet	Contingency Pallet located in the 800 Area	

Pads, booms, and speedi-dry	Contingency Pallet	Absorb materials (liquids) in the event of a spill.
Chemical Resistant Suits, various sizes	Contingency Pallet	Protect personnel from various materials/chemicals.
Chemical Resistant Gloves	Contingency Pallet	Protect hands from various materials/chemicals.
Disposable boots	Contingency Pallet	Protect feet from various materials/chemicals.
Goggles and safety glasses	Contingency Pallet	Protect eyes from foreign materials.
Hand Tools	Contingency Pallet	Open and close containers; misc. maintenance activities.
Face Shields	Contingency Pallet	Protect face from various materials/chemicals.
Hard Hats	Contingency Pallet	Protect head.
Drum vacuum	Contingency Pallet	Remove material from container / transfer to another container.
Hazard identification tape	Contingency Pallet	Identify hazardous area; secure area from unauthorized personnel
Eye Wash with drench hose, portable	Contingency Pallet	Flush eye in the event of foreign substance in contact with eye.
SCBA	Contingency Pallet	Provide breathing air to personnel responding to emergency.
Flashlights	Contingency Pallet and in each Container Storage Area	Portable light source in the event of power failure.

*Please note that spill equipment in areas that are not in service will not be maintained in the areas until those areas are storing wastes.

APPENDIX E-E

PROCEDURES TO PREVENT HAZARDS – TABLE OF CONTENTS

PROCEDURE TO PREVENT HAZARDS - TABLE OF CONTENTS

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APPENDICES

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