

**APPENDIX E**

**POST-CLOSURE CONTINGENCY PLAN**

**POST-CLOSURE CONTINGENCY PLAN  
FOR  
PAGE-TROWBRIDGE RANCH LANDFILL**

**North 32° 36' 26.87"  
West 110° 53' 45.83"  
(Soil Vapor Extraction Array)**

**University of Arizona  
Risk Management Services  
Township 9 South, Range 14 East, Gila and Salt River  
Base and Meridian, Southern Half of Section 27 and Northern Half of Section 34  
Pinal County, Arizona  
EPA ID NO. AZD980665814**

**REVISED DECEMBER 2011**

# TABLE OF CONTENTS

<b>1</b>	<b>CONTINGENCY PLAN OVERVIEW/FACILITY DESCRIPTION.....</b>	<b>1</b>
	1.A Facility Description .....	1
<b>2.</b>	<b>EMERGENCY COORDINATORS .....</b>	<b>2</b>
<b>3.</b>	<b>CRITERIA FOR CONTINGENCY PLAN IMPLEMENTATION .....</b>	<b>4</b>
<b>4.</b>	<b>EMERGENCY RESPONSE PROCEDURES.....</b>	<b>4</b>
	4.A Local Notification .....	4
	4.B Evacuation Plan .....	5
	4.C Assessment.....	5
<b>4.E.</b>	<b>IDENTIFICATION OF HAZARDOUS MATERIALS.....</b>	<b>6</b>
<b>4.F</b>	<b>CONTROL PROCEDURES .....</b>	<b>7</b>
<b>4.G</b>	<b>PREVENTION OF REOCCURRENCE OR SPREAD OF FIRES, EXPLOSIONS OR RELEASES.....</b>	<b>8</b>
<b>5.0</b>	<b>POST-INCIDENT PROCEDURES.....</b>	<b>8</b>
	5.A Storage and Treatment of Released Materials.....	9
<b>5.B</b>	<b>Emergency Equipment .....</b>	<b>9</b>
<b>5.C</b>	<b>Post-Emergency Equipment Maintenance.....</b>	<b>9</b>
<b>5.D</b>	<b>Required Written Reports.....</b>	<b>9</b>
<b>6.0</b>	<b>CONTINGENCY PLAN UPDATE, DISTRIBUTION AND CONTROL .....</b>	<b>10</b>
	6.A Update.....	10
<b>6.B</b>	<b>DISTRIBUTION.....</b>	<b>10</b>

# EXHIBITS

EXHIBIT 1 .....	11
EXHIBIT 2 .....	13
EXHIBIT 3 .....	15
EXHIBIT 4 .....	17
EXHIBIT 5 .....	19
EXHIBIT 6 .....	26
EXHIBIT 7 .....	28

## **1 CONTINGENCY PLAN OVERVIEW/FACILITY DESCRIPTION**

This plan describes the actions to be taken by personnel of the University of Arizona (UA), Risk Management Services Department (RMS), in the event of an emergency at the Page-Trowbridge Ranch Landfill, hereafter referred to as PTRL, during the Post-Closure period.

PTRL is governed by a Post Closure Permit, issued by the Arizona Department of Environmental Quality (ADEQ). This Plan is a required component of the Permit. Non-emergency related procedures are described in other sections of the Permit document. Groundwater and soil vapor monitoring contingency procedures can be found in Post Closure Period Expanded Groundwater and Soil Vapor Detection Monitoring Plan (Appendix B). Inspection and maintenance contingency procedures can be found in the Post Closure Inspection and Maintenance Plan (Appendix D). Lastly, non-emergency medical needs are addressed in the Health and Safety Plan (Appendix F).

### **1.A Facility Description**

Page Ranch is a one square mile parcel of undeveloped property owned by the UA. The property is located in the Oracle/Oracle Junction area of Pinal County, Arizona, north of State Highway 77, approximately seven miles west of Oracle and 30 miles north of Tucson. A site location map is shown as Exhibit 1. Page Ranch is located in Township 9 South Range 14 East, Gila and Salt River Base and Meridian, and includes the southern half of Section 27 and the northern half of Section 34.

UA used PTRL from 1962 to February 1986 for disposal of low-level radioactive and chemical wastes generated by teaching and research laboratories, agricultural research, and maintenance operations at the UA. Limited amounts of laboratory waste were also accepted at PTRL from Northern Arizona University, Arizona State University, and Veteran's Hospital in Tucson.

The PTRL site is located at the southwest corner of the Page Ranch property. The landfill area occupies a total of 3.25 acres and consists of two units: Unit A (northern unit, 200 feet by 200 feet) and Unit B (southern unit, 200 feet wide by 500 feet long). In both units, wastes were placed into individual cells (pits) that were approximately 10 feet deep. Disposal operations began at Unit B, which from the early 1960s received and maintained approval from the Arizona Atomic Energy Commission for disposal of low-level radioactive laboratory wastes.

Disposal of chemical waste into Unit B started in the late 1960s. Chemical waste disposal cells at Unit B were first utilized as open neutralization and burn pits; subsequently, they were used for direct burial of chemicals in one- and five-gallon containers and 55-gallon drums packed with absorbent material (lab packs).

Unit A was placed in operation in 1982 for disposal of chemical wastes only. It was designed and subsequently operated in accordance with the applicable RCRA standards for landfills. The disposal cells were individually double-lined with a chemically resistant synthetic liner. Wastes were received in sealed, 55-gallon drums (DOT 17C). These drums were placed into the cells in single layers, sealed with the plastic liner, and covered with soil.

Waste volumes buried at PTRL total approximately 280 tons of hazardous waste and 312 tons of low-level radioactive waste, including mixed wastes (RCRA + radioactive). Site A (north) was used only for lab-packed hazardous wastes. Site B (south) was used primarily for low-level radioactive waste burial, with some areas also used for RCRA hazardous wastes. Hazardous

chemical wastes buried at PTRL consist primarily of spent organic solvents, ignitables, acids, bases, heavy metals, pesticides, and photographic compounds. Low level radioactive materials buried at PTRL include solvent-based scintillation cocktail solutions, contaminated laboratory materials, and animal carcasses and byproducts.

PTRL closure construction was completed in August 1997. Each disposal unit is separately capped with an earthen final cover that supports native grass vegetation. Storm water is controlled by a system of surface channels and culverts. Both landfill units, all monitoring wells, and the soil vapor extraction system are enclosed by a perimeter security fence. Site access is provided via an unpaved road connecting from the west side of Willow Springs Ranch Road to the Page Ranch east boundary gate. Beyond this gate, the road traverses the Page Ranch property to the PTRL site fence, which has gates on the southeast and northwest corners. These gates are kept locked when UA personnel or their representatives are not present at the site. Warning signs are placed on the fence around the facility. Five groundwater monitoring wells have been installed around the facility (MW-1 through MW-5). Wells MW-2, MW-3, MW-4 and MW-5 are used for groundwater sampling during the post-closure period. Soil vapor monitoring and extraction wells, powered by a solar panel array are located between units A and B of PTRL. The facility layout is shown in Exhibit 2.

## **2. EMERGENCY COORDINATORS**

If an emergency situation develops at the facility, the discoverer or responder will contact the dispatcher at the University of Arizona Police Department (UAPD) at 520-621-8273, or the Tucson Area Agricultural Center's Resident Director. He/she will then contact UAPD for Emergency Coordinator notification. UAPD will immediately contact Emergency Coordinators listed on Page 3. The primary Emergency Coordinator is to be contacted first; if not available, the secondary Emergency Coordinator will be called (in the order listed), until one of the Emergency Coordinators is reached. The first of these individuals contacted will become the Emergency Coordinator.

UAPD Dispatch is manned 24 hours per day, seven days a week. At least one Emergency Coordinator is available by cellular telephone at all times, and UAPD has the telephone numbers of all Emergency Coordinators. Emergency Coordinators can also be contacted directly at the telephone numbers listed on Pages 3 or through UAPD. Emergency Coordinators designated on Page 3 are UA personnel that are thoroughly familiar with PTRL location and layout, characteristics of the disposed wastes and location of the facility records, and have been trained to carry out duties outlined in this Contingency Plan.

The decision to implement the Contingency Plan is based on the Implementation Criteria listed in Section 3. of this document. It is the duty of the Emergency Coordinator to evaluate the situation, and determine if the Contingency Plan is to be implemented and to direct and coordinate all activities undertaken if the Plan is implemented. The Emergency Coordinator is authorized to commit the resources of the University of Arizona as needed, in implementing the Contingency Plan as indicated in Exhibit 3. The specific types of incidents, which require implementation of the Contingency Plan, are listed on Page 4 of this document.

## EMERGENCY COORDINATORS (This page last updated: 12/1/2011)

The Emergency Coordinators designated below are University of Arizona personnel who are directly involved in the management and handling of hazardous waste and are trained in appropriate response measures. The Emergency Coordinators can be contacted directly at the phone numbers listed below or through the University of Arizona Police Department. An Emergency Coordinator is available by cellular phone 24 hours a day.

### UA RISK MANAGEMENT SERVICES

PRIMARY EMERGENCY COORDINATOR	
<b>Steven C. Holland</b> Assistant VP for Risk Management, UA Risk Management Services Dept.	Home Phone: (520) 749-9287 Work Phone: (520) 621-1790 Cellular Phone: (520) 349-4273
Home Address: 12561 E. Sonoran Ridge Drive, Tucson, AZ 85749	

SECONDARY EMERGENCY COORDINATOR (1)	
<b>Herbert N. Wagner</b> Director – Occupational, Environmental Health and Safety UA Risk Management Services Dept.	Home Phone: (520) 881-5448
	Work Phone: (520) 621-7691
	Cellular Phone: (520) 349-0984
Home Address: 2918 E. Croyden, Tucson, AZ 85716	

SECONDARY EMERGENCY COORDINATOR (2)	
<b>Lloyd M. Wundrock</b> Environmental Safety Officer UA Risk Management Services Dept.	Home Phone: (520) 240-9802
	Work Phone: (520) 621-1590
	Cellular Phone: (520) 349-1001
Home Address: 5307 W. Wood Owl Drive, Tucson, AZ 85742	

SECONDARY EMERGENCY COORDINATOR (3)	
<b>Jeffrey G. Christensen</b> Hazardous Waste Supervisor UA Risk Management Services Dept.	Home Phone: (520) 408-4895
	Work Phone: (520) 621-5861
	Cellular Phone: (520) 349-2187
Home Address: 1300 W. Roller Coaster Road, Tucson, AZ 85704	

**COLLEGE OF AGRICULTURE: Stephen Husman, Resident Agriculture Director**

**(520) 621-3146 Work, (520) 429-2760 Cell**

**UA POLICE DEPT: 9-1-1 for campus phones, 621-8273 for non-campus phones (24/7)**

<b>EXTERNAL AGENCY EMERGENCY NOTIFICATION</b>
<b>Arizona Department of Environmental Quality – Emergency Response Unit</b> 602-771-2330 OR 800-234-5677, ext. 2330, in Arizona, 24 hour
<b>Arizona Department of Public Safety – 9-1-1 or 602-223-2163 (not a public number)</b>
<b>National Spill Response Center – 800-424-8802</b>
<b>Arizona Radiation Regulatory Agency – 602-255-4845</b>

### **3. CRITERIA FOR CONTINGENCY PLAN IMPLEMENTATION**

The Contingency Plan will be implemented in the following situations:

1. Fire and/or Explosion
  - a. A fire at the facility has or could cause the release of significant amounts of toxic fumes;
  - b. A fire has originated at the site has spread or is likely to spread to adjacent properties;
  - c. A subsurface fire or explosion within the landfill;
  - d. An uncontrolled fire within one mile of the landfill, which has or is likely to spread to the facility;
2. Flood or Significant Storm Event:
  - a. There is a 100-year storm at the facility or the surrounding area

### **4. EMERGENCY RESPONSE PROCEDURES**

#### **4.A Local Notification**

Due to the remote location of the facility in relation to the UA campus located in Tucson and the fact the facility is unoccupied, the Tucson Area Agricultural Centers' Resident Director has been included as an emergency contact for the site. He/she will contact UAPD to initiate notification of an Emergency Coordinator. The person that becomes aware of an emergency shall immediately notify the Resident Director or UAPD. The individual making the call should provide to UAPD any initial information available. Personnel that are familiar with the area are to remove themselves from the impacted area, but must remain on site until the Emergency Coordinator comes to the site and clears them for departure from the scene. The Emergency Coordinator will evaluate the initial situation report and determine the level of response required, call emergency responders directly or through UAPD (if additional help is required), notify appropriate agencies listed on Pages 8 and 9, and prepare an initial report on the situation.

#### **4.B Evacuation Plan**

If the situation appears uncontrollable and poses a direct threat to human life, a verbal warning will be given to all personnel to secure their emergency equipment and immediately evacuate the area. If the chances for an explosion are high, the entire area will be evacuated to a safe distance downwind of the facility. The evacuation safe distance will be developed by the Emergency Coordinator in consultation with the responding fire department authority. The Emergency Coordinator will alert all personnel when all danger has passed, as determined by the responding fire department authority.

#### **4.C Assessment**

The Emergency Coordinator must assess hazards to human health or the environment that have resulted or might result from the emergency situation. This assessment will consider the following information:

- a. Location of the release or potential release;
- b. Specific hazards of the released or potentially released materials;
- c. An estimate of the release quantity and rate;
- d. The direction of the release;
- e. Likelihood for additional releases;
- f. Personnel in contact with the released chemicals;
- g. possible injuries or sickness;
- h. Estimate of area under influence of release;
- i. Release containment and clean-up procedures.

This assessment will provide the Emergency Coordinator with information to decide if the Contingency Plan is to be implemented. The Emergency Coordinator must also assess the degree of remedial responses that will be required to handle the incident. If the incident is beyond the capabilities of the UA Emergency Response Team, the Emergency Coordinator is responsible for determining the degree of assistance required and notifying other emergency responders regarding the assistance needed, as discussed below.

#### **4.D External Notification**

If the Emergency Coordinator determines that the facility either has had or may have an incident that requires implementation of this plan, the following actions must be taken immediately:

1. Direct UAPD Dispatch to notify the Pinal County Sheriff's Department and advise them of the situation. On site response will be optional unless requested by the Emergency Coordinator.
2. Direct UAPD Dispatch to notify the Golder Ranch Fire District and advise them of the situation. On site response will be optional unless requested by the Emergency Coordinator.

3. In consultation with emergency agencies responding to the incident, determine the need and extent of surrounding area evacuation.
4. Gather the following information necessary to complete the Hazardous Material Incident-Initial Response Report (Exhibit 4):
  - a. Name and telephone number of incident reporter;
  - b. Facility name and location;
  - c. Time and type of incident, and the duration of the event;
  - d. Type and quantity of chemicals involved, if known;
  - e. The medium or media into which the release has occurred;
  - f. Possible hazards to human health and the environment;
  - g. Advice regarding medical attention for exposed individuals, if possible;
  - h. Extent of injuries, if any;
  - i. Proper precautions to take, including evacuation.

The above information shall be collected, as quickly as practicable, but appropriate response actions shall not be delayed for this purpose.

5. As a part of notification procedures, as soon as practicable after becoming sufficiently knowledgeable about the incident, the Emergency Coordinator will contact the External Notification Agencies listed on Page 4 to provide the Initial Response Report information described above.
6. If the Emergency Coordinator determines that outside assistance is required to implement the appropriate remedial response and clean up, he will contact the following response firm which is contracted to provide emergency assistance to state agencies:

Southwest Hazard Control 800-622-3607 (24 Hr Answering Service)

#### **4.E. IDENTIFICATION OF HAZARDOUS MATERIALS**

The following information regarding the hazardous materials contained within the landfill is located at the UA Risk Management Services Department:

- A representative list of chemicals disposed at Page Ranch;
- Manifests;
- Material Safety Data Sheets (MSDS) for various types of chemicals disposed at the landfill.

Risk Management maintains a subscription with ExPub for five users to allow 24/7 access to a number of hazardous chemical databases to guide proper spill response as listed below. The URL is <http://www.expub.com/Default.aspx?AspxAutoDetectCookieSupport=1>.

#### **Login Information on Next Page**

**ExPub LOGIN: UAZ05      PASSWORD: Jeff**

**ACCESS IS FOR UA RISK MANAGEMENT PERSONNEL ONLY! UNAUTHORIZED ACCESS TO THIS WEBSITE IS A LICENSE VIOLATION AND SUBJECT TO ENFORCEMENT.**

ExPub provides access to millions of documents from over 100 sources through a time-saving interface.

Material Safety Data Sheets contain pertinent hazard information for the chemicals which may be stored at the site including:

- Identification of chemical components in each wastestream by name, including synonyms;
- Identification of waste's hazardous characteristics (e.g., toxicity, reactivity, and ignitability);
- Important chemical and physical properties for which data are available, such as vapor pressure, pH, and solubility in water;
- Fire control procedures (e.g., water or chemical foam);
- Appropriate procedures to counteract human exposure (e.g., thorough washing with soap and water in the event of dermal contact).

Extensive MSDS resources and emergency medical guidance are also available 24 hours/day through the Arizona Poison & Drug Information Center, housed at the UA Arizona Health Sciences Center. The phone number is 800-222-1222.

#### **4.F CONTROL PROCEDURES**

The initial response to any emergency will be to protect human health and safety, and then the environment. Secondary response to the emergency will be identification, containment, treatment, and disposal assessment.

If fire or explosion has occurred or appears imminent, any activity within the site fence will be stopped immediately. The Emergency Coordinator will make an assessment whether the fire is controllable with the existing portable fire extinguishers and materials at hand. If the Emergency Coordinator determines that outside emergency response help is needed, the Emergency Coordinator will direct UAPD to contact the Golder Ranch Fire District and the Pinal County Sheriff's Department for onsite assistance.

Outside response agencies will contact the site Emergency Coordinator upon arrival at PTRL to discuss appropriate response to the incident, the nature of the materials involved, and safety and health considerations for response.

If an explosion has occurred, it must be determined immediately if any personnel require medical attention. After the medical attention has been addressed, it must be determined if there is any potential for further reactions or explosions. The safety of personnel at the scene must be addressed before any action is taken. All releases of materials will be considered initially as extremely hazardous, until the released materials are identified, if possible. The Emergency Coordinator will use all necessary precautions, such as:

- a. Use protective equipment;
- b. Secure area from unauthorized access, and control all access;
- c. Approach the release from upwind, if possible;

- d. Avoid any direct or indirect contact with the material;
- e. Remove all possible ignition sources from the immediate area;
- f. Do not allow smoking in the area;
- g. Do not approach if any landfill fuming/smoking is visible.

If the situation appears uncontrollable and poses a direct threat to human life, a verbal warning will be given to all personnel fighting the fire to secure their emergency equipment and immediately evacuate the area. The Emergency Coordinator will consult with the on-scene fire department commander concerning the need for additional evacuation beyond the facility boundaries. This decision will be based on a hazard assessment of the potential for the released materials to migrate beyond the facility boundary in concentrations sufficient to represent a health threat.

The Emergency Coordinator in consultation with the fire department on-scene commander will notify personnel in the area when the immediate hazard has passed for a safe return to the site.

#### **4.G PREVENTION OF REOCCURRENCE OR SPREAD OF FIRES, EXPLOSIONS OR RELEASES**

Specific actions to be taken during an incident to prevent reoccurrence or spread of fires, explosions, or releases within the facility boundaries include the following, as applicable:

- a. Extinguishing the fire;
- b. Collecting, containing, and properly disposing of any released wastes and runoff, if fire was caused by an explosion or waste incompatibility;
- c. Removing all ignition sources from the area, if ignitable wastes are involved;
- d. Removing surrounding materials that could result in spreading of the fire to other parts of the site or to off-site areas.

#### **5.0 POST-INCIDENT PROCEDURES**

As soon as practical, but no later than 48 hours after an incident is concluded, the process to implement the following steps will be initiated:

- a. Notification of the Arizona Department of Administration, Risk Management Division of an environmental damage incident at PTRL to establish a property loss claim.
- b. Repair of the landfill cap to its original integrity and Closure Plan specifications.
- c. Reseeding of the repaired cap surface in accordance with the original Closure Plan specifications.
- d. Repair of any damaged site equipment, security fencing, drainage structures, etc.

## **5.A Storage and Treatment of Released Materials**

The materials collected during the fire fighting, cleanup and/or decontamination operations will be containerized, handled, stored, treated, and/or disposed of, as applicable. This will apply to any disposable equipment used. Immediately after the response to an emergency event, the Emergency Coordinator will make arrangements for proper treatment, storage, and disposing of recovered waste, contaminated soil, contaminated runoff, contaminated surface water, and/or any other contaminated materials resulting from the incident. After initial containerization and storage arrangements have been made, an appropriate decontamination procedure will be specified which will remove any remaining residue in accordance with the cleanup requirements. This procedure will include sampling and analysis to demonstrate the adequacy of cleanup.

Any analyses performed as part of this procedure will include pH, flashpoint, the appropriate EPA methods for volatile and semi-volatile organics, pesticides, phenols, the Toxicity Characteristics Leaching Procedures (TCLP), radioactivity, and /or additional parameters selected based on the conditions specific to the incident.

## **5.B Emergency Equipment**

UA Risk Management Services maintains a limited amount of equipment and supplies that are designated for emergency responses to hazardous materials incidents. Individually assigned gear bags of personal protective equipment are stored in Emergency Coordinator and Emergency Response Team member offices. A listing of supplies and emergency equipment is included in Exhibit 4.

## **5.C Post-Emergency Equipment Maintenance**

All equipment used in the emergency will be decontaminated for future use or discarded in accordance with the appropriate regulations. Any piece of response equipment for which there is not a duplicate piece available will be cleaned or replaced within 48 hours after the emergency event is concluded.

## **5.D Required Written Reports**

Within 15 days after any emergency event that requires implementation of this Contingency Plan, a written report must be submitted to the EPA Regional Administrator and the Arizona Department of Environmental Quality. This written report must contain all the information that was incorporated into the Hazardous Materials-Incident Report form. Additionally, it must include the following descriptive information about the incident:

1. Specific actions taken to respond to and contain the release;
2. Any known or anticipated acute or chronic health risk associated with the release;
3. Advice regarding the medical attention necessary for exposed individuals, if appropriate;
4. Measures which have been or will be taken at the facility to avoid similar releases in the future.

Within 35 days after the incident, a similar written report must be submitted to the Pinal County Local Emergency Planning Committee and the Arizona Emergency Response Commission. Mailing addresses are listed in Exhibit 6.

If new pertinent and/or significant information about the incident becomes available after the submission of written reports, a written addendum report shall be forwarded to the same agencies within seven calendar days.

If the nature of the incident represents a potential liability for civil, environmental, property, or other damages, immediate written notification must also be provided to the Arizona Department of Administration, Risk Management Division. (address also shown in Exhibit 6)

## **6.0 CONTINGENCY PLAN UPDATE, DISTRIBUTION AND CONTROL**

### **6.A Update**

This Contingency Plan will be updated as required to reflect changes in procedures, Emergency Coordinator information, etc. Each page of this Plan incorporates a document footer with the month and year of the current revision. When the plan is updated, the cover page and footer will be updated to reflect the current revision date in the text pages of the document. If an Exhibit to the Plan requires an update, the individual Exhibit will be marked with a revised date.

### **6.B DISTRIBUTION**

Each time the Plan is updated or revised, a complete new copy of the Plan is distributed to each entity identified below. The Plan is distributed via email as a PDF file, and made available in printed hardcopy upon request.

- U of A Police Department
- U of A Risk Management Services
- U of A Radiation Control Office
- U of A Tucson Area Agriculture Centers Resident Director
- Golder Ranch Fire District
- Oracle Fire Department
- Pinal County Local Emergency Planning Committee
- Pinal County Sheriff's Department
- Pinal County Risk Management Office
- Arizona Emergency Response Commission
- Southwest Hazard Control

Copies of the cover letters sent to each agencies are included in this document as Exhibit 7.

**EXHIBIT 1**  
**SITE LOCATION MAP**



**EXHIBIT 2**  
**FACILITY LAYOUT MAP**

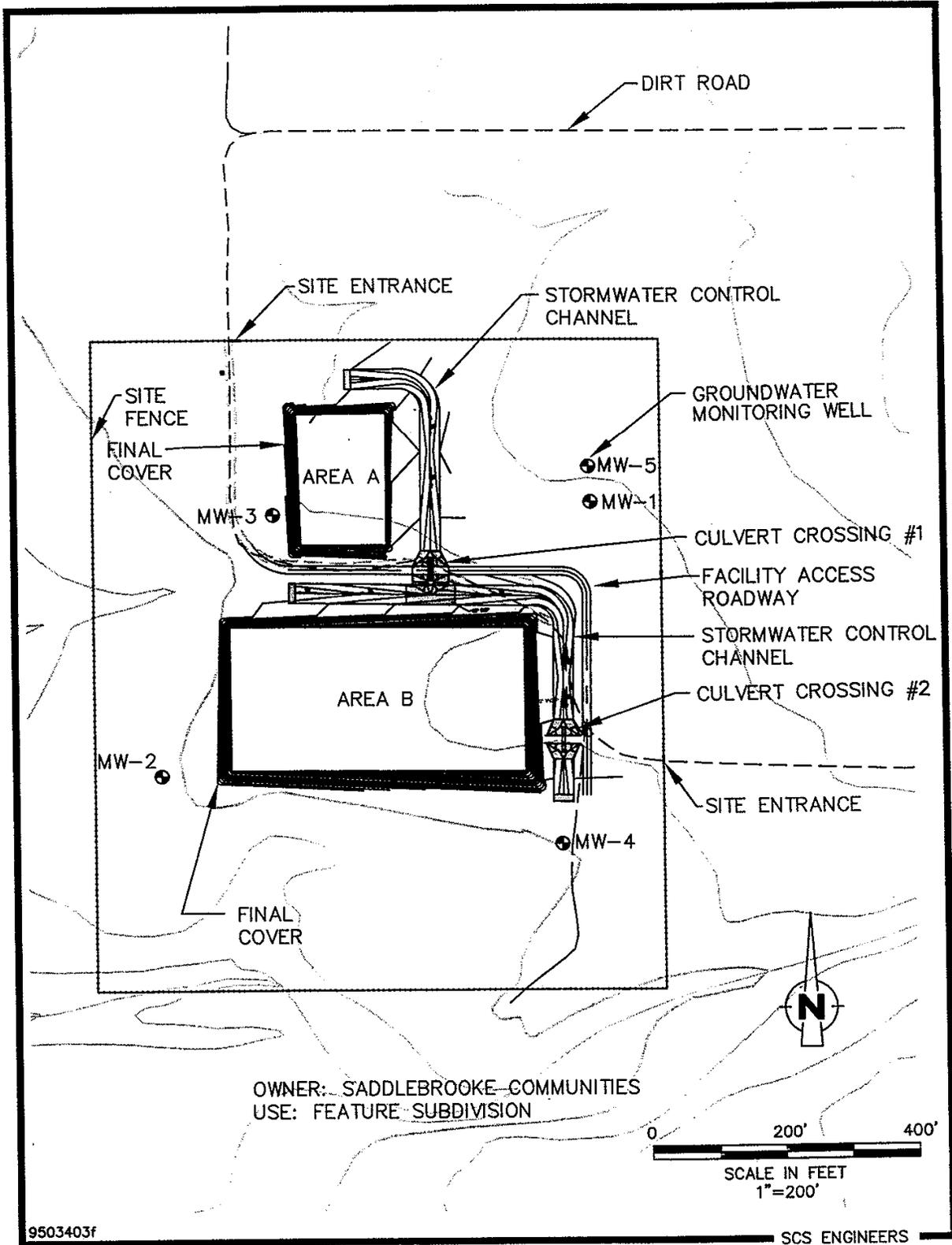


FIGURE L-2. SITE PLAN

**EXHIBIT 3**  
**AUTHORITY FOR EMERGENCY COORDINATORS**  
**TO COMMIT RESOURCES**

March 24, 2011

Arizona Department of Environmental Quality  
Office of Waste Programs  
1110 West Washington Street  
Phoenix, AZ 85007

To Whom It May Concern:

In accordance with the requirements of 40CFR §264.55, the University of Arizona has identified a primary emergency coordinator and three secondary emergency coordinators (listed below). These individuals are authorized to implement the contingency plan for emergency events associated with the University's Hazardous Waste Management program.

Further, in accordance with 40CFR §264.55, the emergency coordinators listed below are authorized to direct and commit, if necessary, all available resources to implement the contingency plan.

Primary Emergency Coordinator:

Steven C. Holland, Assistant Vice President for Risk Management and Safety

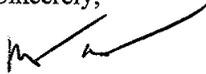
Secondary Emergency Coordinators:

Herbert Wagner, Associate Director of Risk Management and Safety

Lloyd Wundrock, Environmental Safety Officer

Jeff Christensen, Hazardous Waste Program Supervisor

Sincerely,



Milton M. Castillo, CPA  
Sr. Vice President for Business Affairs and Chief Financial Officer

MMC/dk

cc: Brian Seastone, UAPD, Emergency Preparedness Manager  
Melissa Vito, Chair, Campus Emergency Response Team



## **EXHIBIT 4**

### **HAZARDOUS MATERIAL INCIDENT-INITIAL RESPONSE REPORT**

**HAZARDOUS MATERIALS INCIDENT  
INITIAL RESPONSE REPORT**

Responder's Name and Title: \_\_\_\_\_

Incident Location: Building Name and Room No.: \_\_\_\_\_

Street Address if Available: \_\_\_\_\_

Time of Event: \_\_\_\_\_ Estimated Duration: \_\_\_\_\_

Type of Incident: \_\_\_\_\_

Chemicals Released: \_\_\_\_\_

Estimated Volume of Release: \_\_\_\_\_ RQ: \_\_\_\_\_

Type of Container Involved: \_\_\_\_\_

Media Into Which Substance Has Been Released: \_\_\_\_\_

Known Physical Hazards: \_\_\_\_\_

Known Acute Health Hazards: \_\_\_\_\_

Known Chronic Health Hazards: \_\_\_\_\_

Known Injuries: \_\_\_\_\_

Recommended Precautions: \_\_\_\_\_

**EXHIBIT 5**  
**EMERGENCY EQUIPMENT INVENTORY**

## EMERGENCY EQUIPMENT INVENTORY

Emergency response equipment is stored at the Hazardous Waste Management Facility (HWMF) at the north end of the AHSC Central Plant and the Risk Management Services main office in the University Services Annex (USA) building located at Bldg 300B 220 W 6<sup>th</sup> St. 2nd Floor. The items below are listed by their normal storage location.

### Stored at the Risk Management Offices and the HWMF

#### A. Personal Protective Equipment

##### Emergency Response Gear Bags

Distribution: Assistant VP for Risk Management (1)  
Director/Safety Officers (3)  
Health/Safety Coordinators (2)  
Hazardous Waste Specialists (3)  
Total = 9, stored in individual offices

Bag Contents: Tyvek suit (polyethylene-laminated type)  
Grey coveralls and/or regular Tyvek suit  
Neoprene overboots  
Leather gloves  
Latex and/or nitrile gloves (2-3 pair)  
Neoprene oil/acid resistant gloves  
Silvershield gloves and sleeves (2 pair)  
Silvershield apron  
Full-face respirator

(P100/-OV/AG/AM combination cartridges)

##### Mercury cartridges

N95 disposable respirator  
Chemical splash goggles  
Safety glasses (clear or smoke)  
Clean-room booties

Mini-flashlight  
 Duct tape  
 pH indicator paper

Other Available Personal Protective Equipment

Location

Respirators

4 – MSA Self-Contained Breathing Apparatus HWMF Room 121  
 2 – 3M BreathEasy 12 powered air purifying respirators USA Room B213  
 1 -- 3M formaldehyde & acids (white) (set of 3) USA Room B213  
 2 -- 3M P100 cartridges (pink) (set of 3) USA Room B213, B200N

Full-face air purifying respirators

USA Room B221

6 - MSA Ultratwin 3 small 2 med 1 lrg

USA Room B221

Half-face air purifying respirators

USA Room B221

13-- MSA Advantage 420 4 sm, 4 med, 5 lrg

11-- MSA Comfo Classic: 2 sm, 8 med, 1 lrg

6 -- MSA Comfo Elite: 2 sm, 1 med, 3 lrg

20 -- 3M 7500: 5 sm 7501, 7 med 7502, 8 lrg 7503

Cartridges (pairs)

USA Room B200N hall cabinet

USA Room B213 storage

12 - MSA Comfo P100//OV//AG//AM combo (pink & lime green)

5 - MSA Comfo AG//OV//AM (lime green)

10 - MSA Comfo P100 cartridges (pink)

15 – MSA Comfo mercury/chlorine

3 --MSA Advantage P100 (pink)

3 -- MSA Advantage OV//AG//AM (lime green)

3 - MSA Advantage P100//OV//AG//AM (pink & lime green)

9 – MSA Advantage N95 flexifilter

2 – 3M for 7500s P100/OV/AG/AM (pink & lime green)

6 – 3M for 7500s OV/AG/AM (lime green)

18 – 3M for 7500s P100 (pink)

N95 disposable respirators (particulates)

USA Room B213, B221, B200N

Flat fold:	3M 9210	140 single size
	3M 9211	30 (single size with exhalation valve)
	3M 1870	580 single size, biofluid resistant
	3m 1870	40 (single size biofluid resistant)
Cup Style:	3m 1860	140 (regular size, biofluid resistant)
	3m 1860s	80 (small biofluid resistant)

Eye Protection

USA Room B213, B221

- 6 - Uvex Stealth Goggles
- 6 - Uvex Futura Goggles
- 3 – Uvex Goggle – over the glasse
- 9 – Uvex safety glasses

Body Protection

20 – tyvek suits

USA Room B213

4 –Silvershield aprons

USA Room B213

1 – Traffic safety vest

USA Room B213

Hand Protection

USA Room B213

11 – Kevlar/leather gloves

USA Room B213

20 – Silvershield gloves size 8, 10

USA Room B213

6 boxes – Nitrile disposable, size XL, Med

USA Room B213, B223

\*Items may be on loan to various campus locations. See sign out sheet at USA Room B227A Risk Management Reception to locate.

**B. Spill Response Equipment**

	<b><u>Location</u></b>
Hazorb Spill Pillows – 1 case	HWMF Room 121
Hazorb Spill Pillows – 2	USA Room B213
Hazorb Spill Booms – 1 case	HWMF Room 121
Spill Pillows for HF – 1 case	HWMF Room 121
Vermiculite, medium grade – 5 x 14 lb. bags	HWMF Room 121
Sodium Bicarbonate – 4 x 25 lbs.	HWMF Room 121
Clear plastic bags, 4 mil – 1 case	HWMF Room 121
Garden Hoses – 2	HWMF Room 121
Push Broom – 2	HWMF Room 121
Non-sparking plastic dustpans – 1	HWMF Room 121
Polyethylene Sheeting, 6 mil – 1 roll	HWMF Room 121
85 gallon overpack drum – 1	HWMF Room 121
Drum de-header tool – 2	HWMF Room 121
Non-sparking bung wrench – 1	HWMF Room 121
Explosion proof liquid transfer pump – 1	HWMF Room 106B
Liquid transfer pump – 1	HWMF Room 106B
Hako Minuteman Mercury Vacuum	HWMF Room 121
Sigma Automatic Wastewater Samplers – 3	HWMF Room 121
Sensidyne HazCat Chemical ID Kit	HWMF Room 119

**C. Transportation Equipment****Risk Management Vehicles:**

	<b><u>Location</u></b>
Chevy Van 3797 - plate: G-181CZ	Parking Lot at
Chevy Blazer 4242 – plate: G-899DX	220 W. 6th St.
Chevy S-10 Pickup 3574– plate: G-570CA	

Toyota Prius Sedan 3822 – plate: G-A07001	
Dodge Stratus Sedan 3898 – plate: G-503DB	
Chevy C/K 2500 Pickup 3104 – plate: SA-G-810AX	HWMF
Chevy Silverado Box Truck 4022 – plate: G-163DM	HWMF
Chevy Silverado Flat Bed Truck 4707 – plate: G-485GA	HWMF

**D. Communications Equipment**

**Location**

Each staff member is assigned a cellular phone

9 – Portable Two-Way Radios

USA Rooms B224, B226, B246, B250, B241, B239, B235, B237, B254

Rx Frequencies: CH 1 – 460.35000 – UAPD 1

HWMF (3)

CH 2 – 460.55000 – UAPD 2

CH 3 – 460.25000 – UAPD 3

CH 4 – 453.42500 – UA Community Use

CH 5 – 453.10000 – TFD HAZMAT

CH 6 – 453.20000 – TFD Dispatch

Realistic PRO-42 10-Channel Programmable Scanner

USA Room B213

HP Fax Machine Number = 621-3706

USA Room B227

Ricoh Fax Machine Number = 626-4965

HWMF Room 101

**E. Industrial Hygiene Monitoring Equipment**

**Location**

Euroclean Dry HEPA Vacuum

USA Room B213

Foxboro Miran 1B Portable Ambient Air Analyzer

USA Room B213

Industrial Scientific Carbon Monoxide Monitor

USA Room B213

MEI pDRs: Respirable Aerosol Monitors (3)

USA Room B213

Rae Systems QRae 4 gas monitor (O2, H2S, CO, LEL)

USA Room B213

Rae Systems ToxiRae PID (2)	USA Room B213
Rae Systems ppbRae PID	USA Room B213
Rae Systems ppbRAE 3000 PID	USA Room B213
Rae Systems ppbRAE 3000 PID – Biosphere with John Adams	520-409-2575 (cell)
TIF RX-1A Refrigerant Leak Detector	USA Room B213
Jerome 431-X Mercury Vapor Analyzer	HWMF Room 119
TSI IAQ Calc (CO2, Relative Humidity, Temp)	
Draeger Acura pump (colorimetric tubes )	USA Room B213
3 – SKC Airchek Personal Sampling Pumps	USA Room B213
2 – Gilian Gilair Personal Sampling Pumps	USA Room B213
5 – Gast High Volume Air Sampling Pumps	USA Room B213
Assorted Sorbent Tubes & Filters	USA Room B223
Bios Dry Cal	USA Room B223
OHD Fit Tester 3000 – quantitative respirator fit tester	USA Room B221
4- Qualitative respirator Fit Test kits (bitrex)	USA Room B221
Digital micromanometer & pitot tube	USA Room B213
Alnor Thermo Anemometer	USA Room B213
Fluke TiS Infrared camera	USA Room B213

#### **F. Radiation Response Equipment**

#### **Location**

Geiger Mueller Counters - 23	Babcock Room 1213
Low Energy Gamma Scintillators – 9	Babcock Room 1213
Ionization Chambers – 8	Babcock Room 1213
Alpha Scintillators – 2	Babcock Room 1213
Neutron Detectors – 3	Babcock Room 1213
Radon Emission Detectors – 3	Babcock Room 1213
Microstar Dosimeters – 50	Babcock Room 121

**EXHIBIT 6**  
**WRITTEN REPORT ADDRESSES**

**Environmental Protection Agency**

Region IX Administrator  
75 Hawthorne St  
San Francisco, CA 94105

**Arizona Department of Environmental Quality**

Director  
1110 W Washington St  
Phoenix, AZ 85007

**Pinal County Local Emergency Planning Committee**

PO Box 727  
Florence, AZ 85232

**Arizona Emergency Response Commission**

5636 E McDowell Rd  
Phoenix, AZ 85008

**Department of Administration**

Risk Management Section  
100 N 15<sup>th</sup> Ave, Suite 301  
Phoenix, AZ 85007

Phone: 620-542-2182

## **EXHIBIT 7**

### **DISTRIBUTION DOCUMENTATION**

December 1, 2011

Brian Seastone, Commander  
Emergency Preparedness Coordinator  
University of Arizona Police Department  
[seastone@uapd.arizona.edu](mailto:seastone@uapd.arizona.edu)

RE: UA Page-Trowbridge Ranch Landfill – Post Closure Contingency Plan Update  
EPA ID No. AZD-980665814

Dear Commander Seastone,

The University of Arizona manages the Page-Trowbridge Ranch Landfill (PTRL), which is located north of Highway 77, between Oracle Junction and Oracle, in Pinal County, Arizona. The PTRL was used from the early 1960s until 1986 for disposal of low-level radioactive and hazardous chemical wastes generated by the University of Arizona. The facility includes an engineered cover system over the landfill cells, groundwater and soil vapor monitoring wells, and a solar-powered soil vapor extraction system, all encircled by a security fence at the southwest corner of the UA Page Ranch property.

PTRL is regulated under a Post-Closure Permit issued to the UA by the Arizona Department of Environmental Quality. The Permit specifies site monitoring, security, and maintenance procedures for PTRL. One of the required Permit components is a Contingency Plan which describes specific procedures to be implemented in the event of an emergency situation at the PTRL. The Plan must be kept current, and distributed to area law enforcement, emergency response agencies, and others that might respond to an emergency at the site.

The updated Contingency Plan for PTRL is included with this email as a separate attachment. If you wish to have a hardcopy printed and delivered to you, please forward a request and we will provide that for you. If you have any questions about PTRL, or would like to arrange a site visit to be familiar with the facility, please contact this office for assistance.

Best regards,



Steven C. Holland CRM ARM  
Assistant Vice President for Risk Management Services

Enclosure: PTRL Post Closure Contingency Plan – updated December 2011



December 1, 2011

Keith Carsten, Assistant Director  
UA Office of Radiation, Chemical and Biological Safety

[kcarsten@email.arizona.edu](mailto:kcarsten@email.arizona.edu)

RE: UA Page-Trowbridge Ranch Landfill – Post Closure Contingency Plan Update  
EPA ID No. AZD-980665814

Dear Mr. Carsten,

The University of Arizona manages the Page-Trowbridge Ranch Landfill (PTRL), which is located north of Highway 77, between Oracle Junction and Oracle, in Pinal County, Arizona. The PTRL was used from the early 1960s until 1986 for disposal of low-level radioactive and hazardous chemical wastes generated by the University of Arizona. The facility includes an engineered cover system over the landfill cells, groundwater and soil vapor monitoring wells, and a solar-powered soil vapor extraction system, all encircled by a security fence at the southwest corner of the UA Page Ranch property.

PTRL is regulated under a Post-Closure Permit issued to the UA by the Arizona Department of Environmental Quality. The Permit specifies site monitoring, security, and maintenance procedures for PTRL. One of the required Permit components is a Contingency Plan which describes specific procedures to be implemented in the event of an emergency situation at the PTRL. The Plan must be kept current, and distributed to area law enforcement, emergency response agencies, and others that might respond to an emergency at the site.

The updated Contingency Plan for PTRL is included with this email as a separate attachment. If you wish to have a hardcopy printed and delivered to you, please forward a request and we will provide that for you. If you have any questions about PTRL, or would like to arrange a site visit to be familiar with the facility, please contact this office for assistance.

Best regards,



Steven C. Holland CRM ARM  
Assistant Vice President for Risk Management Services

Enclosure: PTRL Post Closure Contingency Plan – updated December 2011



December 1, 2011

Stephen Husman, Resident Director  
UA Campus Agricultural Center

[husman@ag.arizona.edu](mailto:husman@ag.arizona.edu)

RE: UA Page-Trowbridge Ranch Landfill – Post Closure Contingency Plan Update  
EPA ID No. AZD-980665814

Dear Mr. Husman,

The University of Arizona manages the Page-Trowbridge Ranch Landfill (PTRL), which is located north of Highway 77, between Oracle Junction and Oracle, in Pinal County, Arizona. The PTRL was used from the early 1960s until 1986 for disposal of low-level radioactive and hazardous chemical wastes generated by the University of Arizona. The facility includes an engineered cover system over the landfill cells, groundwater and soil vapor monitoring wells, and a solar-powered soil vapor extraction system, all encircled by a security fence at the southwest corner of the UA Page Ranch property.

PTRL is regulated under a Post-Closure Permit issued to the UA by the Arizona Department of Environmental Quality. The Permit specifies site monitoring, security, and maintenance procedures for PTRL. One of the required Permit components is a Contingency Plan which describes specific procedures to be implemented in the event of an emergency situation at the PTRL. The Plan must be kept current, and distributed to area law enforcement, emergency response agencies, and others that might respond to an emergency at the site.

The updated Contingency Plan for PTRL is included with this email as a separate attachment. If you wish to have a hardcopy printed and delivered to you, please forward a request and we will provide that for you. If you have any questions about PTRL, or would like to arrange a site visit to be familiar with the facility, please contact this office for assistance.

Best regards,



Steven C. Holland CRM ARM  
Assistant Vice President for Risk Management Services

Enclosure: PTRL Post Closure Contingency Plan – updated December 2011



December 1, 2011

William Pernet, Chief  
Golder Ranch Fire District

[wpernett@golderranchfire.org](mailto:wpernett@golderranchfire.org)

RE: UA Page-Trowbridge Ranch Landfill – Post Closure Contingency Plan Update  
EPA ID No. AZD-980665814

Dear Chief Pernet,

The University of Arizona manages the Page-Trowbridge Ranch Landfill (PTRL), which is located north of Highway 77, between Oracle Junction and Oracle, in Pinal County, Arizona. The PTRL was used from the early 1960s until 1986 for disposal of low-level radioactive and hazardous chemical wastes generated by the University of Arizona. The facility includes an engineered cover system over the landfill cells, groundwater and soil vapor monitoring wells, and a solar-powered soil vapor extraction system, all encircled by a security fence at the southwest corner of the UA Page Ranch property.

PTRL is regulated under a Post-Closure Permit issued to the UA by the Arizona Department of Environmental Quality. The Permit specifies site monitoring, security, and maintenance procedures for PTRL. One of the required Permit components is a Contingency Plan which describes specific procedures to be implemented in the event of an emergency situation at the PTRL. The Plan must be kept current, and distributed to area law enforcement, emergency response agencies, and others that might respond to an emergency at the site.

The updated Contingency Plan for PTRL is included with this email as a separate attachment. If you wish to have a hardcopy printed and delivered to you, please forward a request and we will provide that for you. If you have any questions about PTRL, or would like to arrange a site visit to be familiar with the facility, please contact this office for assistance.

Best regards,



Steven C. Holland CRM ARM  
Assistant Vice President for Risk Management Services

Enclosure: PTRL Post Closure Contingency Plan – updated December 2011



December 1, 2011

Larry Southard, Chief  
Oracle Fire Department

[lsouthard@oraclefire.org](mailto:lsouthard@oraclefire.org)

RE: UA Page-Trowbridge Ranch Landfill – Post Closure Contingency Plan Update  
EPA ID No. AZD-980665814

Dear Chief Southard,

The University of Arizona manages the Page-Trowbridge Ranch Landfill (PTRL), which is located north of Highway 77, between Oracle Junction and Oracle, in Pinal County, Arizona. The PTRL was used from the early 1960s until 1986 for disposal of low-level radioactive and hazardous chemical wastes generated by the University of Arizona. The facility includes an engineered cover system over the landfill cells, groundwater and soil vapor monitoring wells, and a solar-powered soil vapor extraction system, all encircled by a security fence at the southwest corner of the UA Page Ranch property.

PTRL is regulated under a Post-Closure Permit issued to the UA by the Arizona Department of Environmental Quality. The Permit specifies site monitoring, security, and maintenance procedures for PTRL. One of the required Permit components is a Contingency Plan which describes specific procedures to be implemented in the event of an emergency situation at the PTRL. The Plan must be kept current, and distributed to area law enforcement, emergency response agencies, and others that might respond to an emergency at the site.

The updated Contingency Plan for PTRL is included with this email as a separate attachment. If you wish to have a hardcopy printed and delivered to you, please forward a request and we will provide that for you. If you have any questions about PTRL, or would like to arrange a site visit to be familiar with the facility, please contact this office for assistance.

Best regards,



Steven C. Holland CRM ARM  
Assistant Vice President for Risk Management Services

Enclosure: PTRL Post Closure Contingency Plan – updated December 2011



December 1, 2011

Lou Miranda  
Pinal County Local Emergency Planning Committee

[Lou.miranda@pinalcountyz.gov](mailto:Lou.miranda@pinalcountyz.gov)

RE: UA Page-Trowbridge Ranch Landfill – Post Closure Contingency Plan Update  
EPA ID No. AZD-980665814

Dear Mr. Miranda,

The University of Arizona manages the Page-Trowbridge Ranch Landfill (PTRL), which is located north of Highway 77, between Oracle Junction and Oracle, in Pinal County, Arizona. The PTRL was used from the early 1960s until 1986 for disposal of low-level radioactive and hazardous chemical wastes generated by the University of Arizona. The facility includes an engineered cover system over the landfill cells, groundwater and soil vapor monitoring wells, and a solar-powered soil vapor extraction system, all encircled by a security fence at the southwest corner of the UA Page Ranch property.

PTRL is regulated under a Post-Closure Permit issued to the UA by the Arizona Department of Environmental Quality. The Permit specifies site monitoring, security, and maintenance procedures for PTRL. One of the required Permit components is a Contingency Plan which describes specific procedures to be implemented in the event of an emergency situation at the PTRL. The Plan must be kept current, and distributed to area law enforcement, emergency response agencies, and others that might respond to an emergency at the site.

The updated Contingency Plan for PTRL is included with this email as a separate attachment. If you wish to have a hardcopy printed and delivered to you, please forward a request and we will provide that for you. If you have any questions about PTRL, or would like to arrange a site visit to be familiar with the facility, please contact this office for assistance.

Best regards,



Steven C. Holland CRM ARM  
Assistant Vice President for Risk Management Services

Enclosure: PTRL Post Closure Contingency Plan – updated December 2011



December 1, 2011

Steve Henry, Chief  
Pinal County Sherriff's Department

[Steve.henry@pinalcountyaz.gov](mailto:Steve.henry@pinalcountyaz.gov)

RE: UA Page-Trowbridge Ranch Landfill – Post Closure Contingency Plan Update  
EPA ID No. AZD-980665814

Dear Chief Henry,

The University of Arizona manages the Page-Trowbridge Ranch Landfill (PTRL), which is located north of Highway 77, between Oracle Junction and Oracle, in Pinal County, Arizona. The PTRL was used from the early 1960s until 1986 for disposal of low-level radioactive and hazardous chemical wastes generated by the University of Arizona. The facility includes an engineered cover system over the landfill cells, groundwater and soil vapor monitoring wells, and a solar-powered soil vapor extraction system, all encircled by a security fence at the southwest corner of the UA Page Ranch property.

PTRL is regulated under a Post-Closure Permit issued to the UA by the Arizona Department of Environmental Quality. The Permit specifies site monitoring, security, and maintenance procedures for PTRL. One of the required Permit components is a Contingency Plan which describes specific procedures to be implemented in the event of an emergency situation at the PTRL. The Plan must be kept current, and distributed to area law enforcement, emergency response agencies, and others that might respond to an emergency at the site.

The updated Contingency Plan for PTRL is included with this email as a separate attachment. If you wish to have a hardcopy printed and delivered to you, please forward a request and we will provide that for you. If you have any questions about PTRL, or would like to arrange a site visit to be familiar with the facility, please contact this office for assistance.

Best regards,



Steven C. Holland CRM ARM  
Assistant Vice President for Risk Management Services

Enclosure: PTRL Post Closure Contingency Plan – updated December 2011



December 1, 2011

Jack Flindt  
Pinal County Risk Management

[Jack.flindt@pinalcountyz.gov](mailto:Jack.flindt@pinalcountyz.gov)

RE: UA Page-Trowbridge Ranch Landfill – Post Closure Contingency Plan Update  
EPA ID No. AZD-980665814

Dear Mr. Flindt,

The University of Arizona manages the Page-Trowbridge Ranch Landfill (PTRL), which is located north of Highway 77, between Oracle Junction and Oracle, in Pinal County, Arizona. The PTRL was used from the early 1960s until 1986 for disposal of low-level radioactive and hazardous chemical wastes generated by the University of Arizona. The facility includes an engineered cover system over the landfill cells, groundwater and soil vapor monitoring wells, and a solar-powered soil vapor extraction system, all encircled by a security fence at the southwest corner of the UA Page Ranch property.

PTRL is regulated under a Post-Closure Permit issued to the UA by the Arizona Department of Environmental Quality. The Permit specifies site monitoring, security, and maintenance procedures for PTRL. One of the required Permit components is a Contingency Plan which describes specific procedures to be implemented in the event of an emergency situation at the PTRL. The Plan must be kept current, and distributed to area law enforcement, emergency response agencies, and others that might respond to an emergency at the site.

The updated Contingency Plan for PTRL is included with this email as a separate attachment. If you wish to have a hardcopy printed and delivered to you, please forward a request and we will provide that for you. If you have any questions about PTRL, or would like to arrange a site visit to be familiar with the facility, please contact this office for assistance.

Best regards,



Steven C. Holland CRM ARM  
Assistant Vice President for Risk Management Services

Enclosure: PTRL Post Closure Contingency Plan – updated December 2011



December 1, 2011

Paul Culberson  
Arizona State Emergency Response Commission (AZSERC)

[Paul.culberson@azdema.gov](mailto:Paul.culberson@azdema.gov)

RE: UA Page-Trowbridge Ranch Landfill – Post Closure Contingency Plan Update  
EPA ID No. AZD-980665814

Dear Mr. Culberson,

The University of Arizona manages the Page-Trowbridge Ranch Landfill (PTRL), which is located north of Highway 77, between Oracle Junction and Oracle, in Pinal County, Arizona. The PTRL was used from the early 1960s until 1986 for disposal of low-level radioactive and hazardous chemical wastes generated by the University of Arizona. The facility includes an engineered cover system over the landfill cells, groundwater and soil vapor monitoring wells, and a solar-powered soil vapor extraction system, all encircled by a security fence at the southwest corner of the UA Page Ranch property.

PTRL is regulated under a Post-Closure Permit issued to the UA by the Arizona Department of Environmental Quality. The Permit specifies site monitoring, security, and maintenance procedures for PTRL. One of the required Permit components is a Contingency Plan which describes specific procedures to be implemented in the event of an emergency situation at the PTRL. The Plan must be kept current, and distributed to area law enforcement, emergency response agencies, and others that might respond to an emergency at the site.

The updated Contingency Plan for PTRL is included with this email as a separate attachment. If you wish to have a hardcopy printed and delivered to you, please forward a request and we will provide that for you. If you have any questions about PTRL, or would like to arrange a site visit to be familiar with the facility, please contact this office for assistance.

Best regards,



Steven C. Holland CRM ARM  
Assistant Vice President for Risk Management Services

Enclosure: PTRL Post Closure Contingency Plan – updated December 2011



December 1, 2011

Jim Santino  
Southwest Hazard Control

[jsantino@swhaz.com](mailto:jsantino@swhaz.com)

RE: UA Page-Trowbridge Ranch Landfill – Post Closure Contingency Plan Update  
EPA ID No. AZD-980665814

Commander Seastone,

The University of Arizona manages the Page-Trowbridge Ranch Landfill (PTRL), which is located north of Highway 77, between Oracle Junction and Oracle, in Pinal County, Arizona. The PTRL was used from the early 1960s until 1986 for disposal of low-level radioactive and hazardous chemical wastes generated by the University of Arizona. The facility includes an engineered cover system over the landfill cells, groundwater and soil vapor monitoring wells, and a solar-powered soil vapor extraction system, all encircled by a security fence at the southwest corner of the UA Page Ranch property.

PTRL is regulated under a Post-Closure Permit issued to the UA by the Arizona Department of Environmental Quality. The Permit specifies site monitoring, security, and maintenance procedures for PTRL. One of the required Permit components is a Contingency Plan which describes specific procedures to be implemented in the event of an emergency situation at the PTRL. The Plan must be kept current, and distributed to area law enforcement, emergency response agencies, and others that might respond to an emergency at the site.

The updated Contingency Plan for PTRL is included with this email as a separate attachment. If you wish to have a hardcopy printed and delivered to you, please forward a request and we will provide that for you. If you have any questions about PTRL, or would like to arrange a site visit to be familiar with the facility, please contact this office for assistance.

Best regards,



Steven C. Holland CRM ARM  
Assistant Vice President for Risk Management Services

Enclosure: PTRL Post Closure Contingency Plan – updated December 2011

