

**ATTACHMENT E**  
**CONTINGENCY PLAN**



**VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.**

**5736 WEST JEFFERSON STREET**

**PHOENIX, AZ 85043**

**SITE CONTINGENCY PLAN**

# CONTINGENCY PLAN

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## 1.0 INTRODUCTION

### 1.1 Purpose

Veolia ES Technical Solutions, L.L.C. (VES) will devote the necessary resources to maintain safe working conditions and practices for its employees. In the event of emergency situations including fires, explosions, spills, natural disasters, bomb threats, and leaks of hazardous chemicals, management has the responsibility to have in place procedures to effectively deal with all foreseeable situations. This Contingency plan and all ongoing efforts to implement it are intended to discharge that responsibility.

It should be kept in mind that emergency situations are infinitely variable and cannot all be foreseen in every kind and detail. Procedures set forth herein are products of the best judgment of the company and applicable references. However, situations can occur in which recommended procedures may not be fully applicable or adequate. Judgment of the individual in such cases must be relied upon.

#### 1.1.1 Content

The purpose of this Contingency Plan is to describe the actions that facility personnel must take to comply with 40 CFR 264 Subpart D requirements in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents which could threaten human health or the environment (40 CFR 264.52(a)). This Contingency Plan also provides for the safety and welfare of facility personnel.

This plan describes how emergencies can best be evaluated and how company employees and proper authorities are to be informed. Within this Contingency Plan are set forth procedures to be followed in the event of spill-related emergencies, non-spill-related emergencies, and the need for evacuation. In addition, non-emergency environmental and health safeguards are addressed.

This plan provides for the establishment of an Emergency Coordinator who has the responsibility for evaluating and declaring an emergency condition and the authority for implementing this plan. It sets forth requirements for the maintenance of appropriate records concerning all aspects of contingency planning.

#### 1.1.2 Implementation

The provisions of this Contingency Plan will be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment (40 CFR 264.5 1(b)).

#### 1.1.3 Amendment of Contingency Plan

The Contingency Plan will be reviewed and immediately amended, if necessary, whenever any of the following occur:

- The facility permit is revised.

- The Plan fails in an emergency.
- The facility changes its design, construction, operation, maintenance, or other circumstances 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.
- The list of emergency equipment changes.

#### **1.1.4 Location and Distribution of Contingency Plan**

A copy of this Contingency Plan is maintained in the following locations at the VES facility:

- Conference Room in Building # 4
- Environmental Health & Safety Office
- Process buildings #1-4
- An additional copy of the Contingency Plan is located in a lock box on the south wall in front of Building 3 (Exhibit E-6). This additional facility copy of the Contingency Plan shall also be updated when any change is made to the plan. Because this copy of the Contingency Plan is an additional facility copy, VES may elect to delete it as a requirement upon submittal of a Class 1 permit modification to the ADEQ.

A copy of this Contingency Plan has also been provided to the following organizations:

- Phoenix Fire Department
- Phoenix Police Department
- Maricopa County Local Emergency Planning
- Arizona Emergency Response Commission
- Arizona Department of Environmental Quality Emergency Response Unit
- Maryvale Medical Center
- St. Joseph Hospital and Medical Center
- Concentra Medical Center
- US EPA Region 9 Preparedness Coordinator
- US EPA Region 9 Waste Management Division, Permitting

VES's efforts to coordinate emergency response operations with local emergency services are described in Section 3.2 of this Contingency Plan.

## 12 Facility Description

VES is located at 5736 West Jefferson Street, Phoenix, Arizona, is situated on approximately 2 acres of land. The building area is approximately 80,000 square feet. A building floor plan is shown in Exhibit E-6, identifying the location of fire extinguishers, eyewash stations, spill response kits, evacuation routes, and exit doors.

### 1.3 Key Personnel and Emergency Duties

#### 1.3.1 Designated Key Personnel

The following personnel designations are established by this plan (Exhibit E-1):

**Emergency Coordinator (EC).** This person has the responsibility to evaluate any unusual circumstance or occurrence reported to or observed by him/her, to formally declare that an emergency condition exists and to invoke formal implementation of this plan. The EC shall assure that his/her alternate is present and appropriately advised whenever the EC is to leave or be absent from the company premises. The EC shall at all times carry a pager receiver, which will be capable of specifically alerting him/her to the existence of an emergency condition. As of the date of this Contingency Plan or current revision thereof, the designated Emergency Coordinator is:

**Designated Emergency Coordinator** *Wayne Bulsiewicz, EHS Manager*

*Office Number: (602) 233-2955*  
*Home Phone Number: (623) 215-2539*  
*Cell Phone Number: (602) 725-7726*

- **Alternate Emergency Coordinator (Alternate EC).** This person has the identical responsibility as the EC, which shall be in effect whenever the EC advises him/her. The period of responsibility shall remain in effect until the EC specifically advises him/her that it is terminated. The Alternate EC shall at all times carry a device, which will be capable of specifically alerting him/her to the existence of an emergency condition. As of the date of this Contingency Plan or current revision thereof, the designated Alternate EC's are:

#### **Alternate Emergency Coordinators**

*Mike Bomgardner, Transportation Manager*  
*Office Number: (602) 233-2955*  
*Home Phone Number: (623) 853-1041*  
*Cell Phone Number: (602) 725-8038*

*Scott Achbach, Operations Supervisor*

*Office Number:* (602) 233-2955  
*Home Phone Number:* None  
*Cell Phone Number:* (602) 725-8453

*Tim Town, Assistant Operations Supervisor*

*Office Number:* (602) 233-2955  
*Home Phone Number:* None  
*Cell Phone Number:* (602) 725-7759

### **1.3.2 Required Duties of the Emergency Coordinator**

The EC, and Alternate EC are thoroughly familiar with all aspects of this Contingency Plan, all facility operations and activities, the location and characteristics of wastes handled, the location of facility records, and the facility layout. These personnel also have the authority to commit the resources needed to carry out this Contingency Plan in the event of an emergency (40 CFR 264.55). The emergency procedures described in 40 CFR 264, Subpart D (40 CFR 264.56), contains specific responsibilities and duties imposed on and required of the EC. This paragraph is incorporated into and made a part of this Contingency Plan by reference.

### **1.4 Reporting**

In accordance with 40 CFR 264, Subpart E (40 CFR 264.73), VES keeps a written Operating Record at its Phoenix facility. In accordance with the aforementioned §264.56(j) Emergency Procedures, the EC shall enter or cause to be entered in the Operating Record the time, date and details of any incident requiring implementation of this Contingency Plan.

Within 15 days after the incident, the EC has the responsibility of submitting a written report on the incident to the Arizona Department of Environmental Quality (ADEQ). This report must include the following:

- Name, address and phone number of the facility and the owner/operator
- Date, time, and type of incident
- Name and quantity of material(s) involved
- Extent of injuries, if any
- An assessment of actual or potential hazards to human health and/or the environment  
Estimated quantity and ultimate disposition of recovered material involved in the incident.

## 2.0 EMERGENCY PROCEDURES: NON-SPILL

### 2.1 Fire

Building plan provided in Exhibit E-6 identifies the location of fire extinguishers, eyewash stations, spill response kits, evacuation routes, and exit doors. A list of emergency equipment available in the facility is provided in exhibit E-2 of this permit.

In the event of a fire, **all personnel** shall follow procedures listed below:

- a. **IMMEDIATELY** notify your supervisor or call the EC or operations manager.
- b. **Incipient Stage fires:** Personnel who are trained in the use of fire extinguishers may attempt to extinguish an incipient stage fire. All other personnel must evacuate the area. If the fire is contained or isolated and not near other combustibles or equipment- such as a fire in a wastebasket or trash can- you may try to find a lid or other flat object and cover the container as an alternate means of extinguishing the fire. DO NOT attempt to move a container with a fire in it. If you are not immediately successful in extinguishing the fire, notify the EC or Operations Manager immediately and tell them where the fire is.  
**If the fire is not contained and/or is in or near other combustibles, flammable liquids, gases or electrical equipment** you are to evacuate the area with all other personnel using standard evacuation procedures (see Part 4.0). After evacuating the area, immediately notify the EC or Operations Manager that there is a fire and tell them where it is.
- c. **(Operations Manager and/or EC):** If a fire emergency report is received, IMMEDIATELY call the fire department and dispatch another person to proceed outside to the front of the facility to direct the fire department to the fire.
- d. When the EC arrives on the fire scene, he/she shall evaluate the size, nature and location of the fire and decide whether facility personnel should attempt or continue to fight the fire. If fire has consumed a large area, involves or threatens to involve flammable liquids, gases or electrical equipment, he shall direct all employees to evacuate, using standard evacuation procedures (see Part 4.0), and await the arrival of emergency personnel. Unless hazardous or impossible to do so, main gas valves shall be shut off. All electrically powered equipment shall be shut down at the breakers. Lighting shall remain on. **If fire involves any compressed gas cylinders or hazardous materials, the fire department must be warned before they enter the building or fire area.**
- e. **If you are in a closed office** and become aware of a fire in the office area of the building, first feel the door. If it is hot or warm - **DO NOT OPEN IT**. If it is not hot or warm, place your foot firmly on the floor an inch or two away from the door and slowly open the door so you can observe conditions outside the door. If you see little or no smoke, neither see nor feel fire heat, and the way to the outside door appears to be passable, immediately evacuate.

f. **If you have determined from the inside that the door is hot**, try to find materials with which to seal or obstruct any space under the door (except paper), move as far away from the door as possible, lie down on the floor and remain as calm as possible until help arrives.

## **2.2 Natural Disaster**

For the purposes of this document, natural disasters in the Phoenix area are considered potentially to be earthquake, windstorm and/or monsoon rain. If a natural disaster should occur during working hours, businesses, industries and their employees can be greatly affected. Natural disaster preparedness planning is essential. The focus of this section is on emergency preparedness at VES.

### **2.2.1 Earthquake**

If you perceive that an earthquake is occurring, you should act according to the following:

- a. If you are operating any rotating machinery and it is possible to do so quickly, **shut it down immediately**.
- b. **If indoors**, seek cover in small walled areas such as closets or hallways, under heavy machinery, tables, desks or racks supported from the floor, or between two or more large items of furniture or equipment that you can't get under. Stay away from windows, outer walls and exterior doorways. **If outdoors**, move to the open, away from buildings, trees and power lines.
- c. **Do not evacuate unless or until instructed to do so**, unless there is immediate danger to you that, in your judgment, requires you to evacuate.

### **WHEN THE EARTHQUAKE HAS STOPPED, YOU SHOULD DO THE FOLLOWING:**

- a. Cooperate with and **follow the instructions** of a supervisor and outside emergency officials.
- b. **Check for injuries and administer first aid**. Provide assistance to injured and handicapped persons or get help for them.
- c. **Look for persons** that you know to have been present and report any missing to a supervisor.
- d. **Report continuing emergency situations** to your supervisor or, if you can't find a supervisor and you consider it necessary, call 911 if phones are working.
- e. **Turn off all local gas valves** and look for fires and chemical spills. **DO NOT SMOKE OR LIGHT MATCHES**. Supervisors will shut off main gas valves at each building, if necessary.

- f. **Shut off all local electric equipment power switches.** Supervisors will shut off main power breakers, if necessary.
- g. Make sure **all telephone handsets are on the hook** when not in use. Avoid using telephones for non-emergency purposes.
- h. **Listen for emergency information** over a battery-operated radio, if available.
- i. **Remain calm.** Reassure and help others to the best of your ability.

### 2.2.2 Monsoon

The Monsoons in the Phoenix area are thunderstorms accompanied by heavy rains. The facility has been constructed to prevent the run-off of storm water. All storm water that falls within the process work area is accumulated on-site. Although the water accumulates on site, storm water levels are not expected to reach building floor elevation.

The only precaution to be taken when heavy rains are expected is physical inspection of roof drains to assure they are not clogged with debris and will freely drain roof water as intended.

### 2.2.3 Windstorm

It is to be expected that an impending windstorm will provide sufficient advance warning to give supervisors time to issue instructions to secure the yards and buildings. Any materials that have been temporarily staged outdoors will be moved to an indoor area. There are typically no items stored in outside that would be subject to windstorm damage or activity.

Personnel are cautioned to remain inside buildings during high winds and to return to buildings if caught outside by high wind. In this case, personnel should avoid placing themselves under or near overhead power lines and should never touch anything appearing to be an electric wire on the ground.

### 2.3 Bomb Threat

Any employee might receive a bomb threat by phone. It is vital to react without shock or panic. Use your wits and be as alert as you can. If you receive a bomb threat, keep the caller talking as long as possible. If pencil and paper are handy, make notes about what is said and your impressions. Ask questions. Get the caller to repeat what he/she said and continue to take notes. **Do not hang up or transfer the call.** Do not consider it a hoax or joke. Listen carefully. If possible, alert a fellow employee to the incident by passing them a note and asking that a supervisor be notified immediately.

Try to obtain information about the location of the bomb and the intended time of detonation. (Think: When and Where?). These two items are most important. Tell the caller that unless you

have this information, innocent people will be injured. Tell them that you believe that they really don't want to injure a lot of people.

Try to get as many distinguishing features about the caller as you can. Following is a checklist:

- a. Time and date of call.
- b. General information given by the caller such as where the bomb is placed, when it is set to go off, why it was placed, what type of bomb it is, etc.
- c. Type of voice; whether it is loud, soft, raspy, high-pitched, low-pitched, pleasant, intoxicated or slurred.
- d. Caller's manner of speaking; whether it is calm, angry, rational, irrational, coherent, incoherent, emotional or laughing.
- e. Listen to the speech and try to determine whether it is fast, slow, distinct, distorted, stuttering, accented, nasal, or lisping.
- f. Be aware of background noises such as factory sounds, machines, motors, trains, bedlam, animals, music, quiet, office machines, voices, places, traffic, public address system announcements, party atmosphere, etc.
- g. Try to ascertain the caller's general identity such as male, female, adult, juvenile.  
Was the language well spoken, good, fair, abusive, foul?
- h. Did you perceive any accent such as local, foreign, southern, etc?

You may not remember all of the above items, but you are trying to get information about location, time, type of bomb, identity of caller in terms of what he/she sounds like, so that you can make a sensible statement about what you heard. Your information may be helpful to police in locating the bomb, evacuating the building, and identifying the caller if the situation is genuine.

Following a bomb threat, notify your supervisor immediately. He/she will contact the Police Department to conduct a search of the building.

#### **2.4 Hostile Visitor**

A hostile visitor at work might confront any employee. If this should occur, try to contact your supervisor or the EC immediately and let them handle the situation. If your supervisor is not available you should do the following:

Whenever possible confine the hostile visitor to the lobby. If the visitor is in your work area, ask (him) to wait in the lobby while you resolve (his) problem. Explain that if (he) waits in the lobby

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you will be able to resolve the problem more quickly.

- a. You must be concerned with lessening the potential for violence. Remember that the visitor is emotional and may not be rational or logical.

Try to be agreeable, understanding, and sympathetic with the person and tell (him) you are doing everything you can to resolve the problem.

Do not become confrontational, argue or disagree with the person. Any show of contempt is almost certain to provoke hostility and possible violence.

- c. If you are not able to resolve the problem immediately, tell the visitor you will contact (him) as soon as you have more information.

Get the visitor's name and phone number or address to facilitate contacting (him).

- d. If the visitor becomes violent or abusive, call 911.

Also, remember that VES policy does not allow the unapproved solicitation of its employees and that VES maintains a policy of restricted access to its buildings by non-employees. Should you be approached while in the building or should you observe someone who is not an employee and is unescorted, you must bring the situation to the attention of your supervisor immediately.

## **3.0 EMERGENCY PROCEDURES: SPILL**

### **3.1 Response Procedures**

#### **3.1.1 Release Identification**

In the event of a chemical spill or release of a hazardous material, the employee discovering the release situation will notify the EC. The EC will immediately identify the character, source, amount and extent of the release. The primary means of identification will be visual analysis of the material and identification information exhibited on the container(s) involved, if visible.

#### **3.1.2 Hazard Assessment**

Once the nature and extent of the chemical release are known, the EC will assess possible hazards, both direct and indirect, to human health and the environment. Data contained on the Material Safety Data Sheets (MSDS) and generator's Waste Material Profile Sheets will be used as a basis for making this assessment. The EC will determine whether or not a sufficient hazard exists as to warrant evacuation of areas surrounding the release site (Emergency Response Flow Chart, Exhibit E-3). If site evacuation is necessary, the procedures described in the Evacuation Plan (Section 4.0) will be followed.

#### **3.1.3 Release Notification**

If the EC determines that the facility has had a release of a hazardous substance that exceeds the Reportable Quantity, the EC will immediately notify the National Response Center, Arizona Department of Environmental Quality and appropriate local authorities orally. If a spill does not involve the release of a reportable quantity but does require the implementation of the contingency plan, the EC will notify the Arizona Department of Environmental Quality and appropriate local authorities listed in Exhibit E-1. The required content of such an oral report is shown in Exhibit E-4.

#### **3.1.4 Response Activities**

During an emergency, the EC will direct the implementation of measures necessary to ensure that fires, explosions and releases do not occur, recur or spread to other hazardous materials at the plant. These measures will include, where applicable, shutting down processes and operations, collecting and containing released hazardous materials and removing or isolating non-affected containers.

If process equipment is involved in the emergency, the EC will monitor for leaks, pressure buildup, gas generation or ruptures in such equipment as deemed appropriate. Since most hazardous material emergencies involve the transfer and movement of these materials, extensive process equipment monitoring will generally not be necessary.

The EC will direct spill containment and clean-up activities when on-site resources are available for such efforts. If resources are not sufficient to fully contain and/or clean up spills, the EC will summon outside assistance as deemed necessary.

If VES personnel are to be utilized for spill containment and clean-up activities, they will use the appropriate emergency equipment listed in Exhibit E-2. The following containment procedures will be instituted as deemed appropriate by the EC to control and contain a release:

- a. Temporary dikes will be constructed to prevent the spread of liquid from its source to contaminate surrounding areas.
- b. Leaking or ruptured containers will be isolated and moved to a secure area, if possible.
- c. Leaking containers will be placed into appropriate overpack containers, if possible.
- d. Small spills of liquid which are not spreading will be absorbed using a chemically inert absorbent material and the spent absorbent material placed in appropriate containers.
- e. Large spills of liquid, in addition to containment, may require the use of a portable pump to transfer the liquid into appropriate containers (assistance from emergency response authorities may be required).
- f. Solid spill material will be placed in appropriate containers.
- g. Appropriate decontamination procedures will be instituted depending on the nature of the spill material.

### **3.1.5 Post-Emergency Activities**

Immediately after an emergency, the EC and appropriate facility management will make arrangements for the proper treatment, storage or disposal of the recovered hazardous materials, contaminated soil and absorbents, contaminated surface water and any other materials contaminated from a release, fire or explosion. If collected material is determined to be a RCRA waste or a PCB waste as defined by TSCA, it will be handled, stored and disposed of in accordance with those regulations. The areas affected will be tested in accordance with applicable EPA test procedures to ensure that all residual contamination has been removed.

Following all emergencies, it is the responsibility of the EC and facility maintenance personnel to ensure that any emergency equipment used is cleaned, inspected and made fit for reuse prior to resuming operations.

Following an emergency involving the release of a hazardous waste or hazardous waste constituents and warranting implementation of this Contingency Plan, it is the responsibility of

the EC to notify the Arizona Department of Environmental Quality and appropriate state and local authorities listed in Exhibit E-1 that post-emergency equipment maintenance has been completed and that operations will be resumed if they have been interrupted.

The EC will notify the Arizona Department of Environmental Quality within 15 days after any incident involving the release of hazardous materials which results in implementation of this Contingency Plan. A copy of this report will be included in the facility's daily Operation Record. The report contents are listed in Exhibit E-4.

An abbreviated list of the specific emergency procedures that will be implemented by the EC and plant personnel when a fire or explosion involving hazardous materials or a hazardous material release occurs is presented in Exhibit E-5.

### **3.2 COORDINATED EMERGENCY SERVICES**

Coordinated emergency service arrangements have been established with the City of Phoenix Fire Department, City of Phoenix Police Department, two local hospitals, a medical treatment clinic and a spill response company. Inventory data concerning all hazardous chemicals for this facility have been made available to the Fire Department. The Fire Department does not provide written details of the emergency services they provide; however, they have been invited to the facility site for the following activities:

- a. Familiarization with the facility, including reviewing the type of hazardous materials handled at the facility;
- b. Review of the facility emergency procedures and their interrelation with fire and police department procedures; and
- c. Tour of facility and fire protection systems.

The Phoenix Police Department will respond to an emergency as needed to provide crowd and traffic control and to evacuate surrounding areas if required. Agreements exist with local hospitals and/or medical clinics to provide treatment to employees injured at work and can be sent to either location.

Veolia ES Special Services, Inc. has agreed to provide on-call emergency response services for the facility. They are equipped to respond to emergency needs concerning the containment, clean up and removal of hazardous materials released as a result of explosions, fires or chemical spills. They are equipped with trained personnel and emergency equipment such as safety suits, glasses and boots, and SCBA air equipment. Their capabilities cover all hazardous materials and wastes present on the facility site.

A complete list of organizations providing coordinated emergency services is presented in Exhibit E- 1.

#### **4.0 EVACUATION PROCEDURES**

The effective and successful emergency movement of people requires discipline and supervision. Personnel trained in proper evacuation methods will make the relocation of any number of people a safer operation. These requisites are a part of VES's program and supervisory personnel training and policy. Facility personnel will be notified of an emergency by activation of the facility alarm system or other appropriate means.

All employees will become familiar with and understand the Evacuation Map (Exhibit E-6) posted on the Safety Bulletin Board and know where all exits are located. The following procedures assure safe, quick evacuation if it becomes necessary:

- a. If a signal or order to evacuate is given, all personnel shall follow established evacuation routes to exits, which give access to the exterior and to the street.
- b. It is imperative that all employees assemble in the pre-determined Evacuation Meeting Area. A roll call will be taken. This is the only way an employee who may be trapped in the building can be identified and found.
- c. Employees must follow all directions from emergency personnel. Employees may not re-enter the building until notified to do so by the EC. No employee shall leave the meeting area or the VES facility without permission from his or her supervisor.

## **5.0 ENVIRONMENTAL MONITORING**

### **5.1 Monitoring Procedure**

#### **5.1.1 Purpose**

The purpose of this section is to identify the environmental monitoring equipment that is available for use in the event of an emergency. These instruments may be used for evaluating PPE selection and evaluating the extent of releases to the atmosphere.

#### **5.1.2 Monitoring Equipment**

The following equipment is available at the facility:

- Jerome 431-X Gold Film Mercury Analyzer or equivalent.
- BW Technologies Gas Alert Max 4-Gas Detector or equivalent

#### **5.1.3 Procedure**

All monitoring will be performed by personnel trained in the use of the applicable monitoring instruments.

## **6.0 HAZARD MITIGATION**

### **6.1 Purpose**

This section is intended to delineate procedures and equipment available and in place at the facility to prevent or minimize hazards associated with material handling operations, to minimize the effects expected to result from equipment failure and power outage, and to prevent undue exposure of personnel to hazardous waste.

#### **6.1.1 Special Procedures for Hazardous Conditions**

Immediately upon discovery of a hazardous condition associated with material handling operations and after the EC has been notified, create a secure area by exclusion of access and marking a boundary. Only the assigned response crew, the EC, and other personnel authorized by the EC shall be permitted to enter the secured area. The EC or his designee shall verify that all personnel entering the secured area are wearing the appropriate personal protective equipment.

### **6.2 Equipment failure and power outage**

#### **6.2.1 Equipment Failure**

It is recognized by VES that the most effective way to mitigate the effects of equipment failure is to prevent or minimize it through careful attention to the following:

- Proper scheduled maintenance of all building, process and material handling equipment
- Maintain an adequate stock of spare parts
- Proper interlocking of process equipment for safe start up and shutdown of equipment
- Proper maintenance of interlocks and safety devices

In the event of equipment failure, the EC shall be notified and the process will be shut down in accordance with manufacturer requirements and the facility's policy. Environmental monitoring shall be carried out, at the discretion of the EC, in accordance with section 5.1.3 above.

#### **6.2.2 Power Outage**

The following procedures shall be instituted upon failure of building power or local circuits powering process equipment, if processing is underway at the time of a power failure:

- Immediately cap all material entrance and exit openings on process equipment housings and simultaneously notify the EC.

- Initiate monitoring of the affected area using the proper instrument and remove any non essential personnel from the area. Personnel remaining in the area shall don the appropriate personal protective equipment. If building doors are closed at the time of the emergency the doors should be opened for ventilation.

### **6.3 Personnel Exposure to Hazardous Waste**

The undue exposure of personnel to hazardous waste will be effectively minimized by adherence to the following:

- The provision of quality, well-designed equipment and facilities.
- The establishment and implementation of proper procedures.
- The exercise of skilled and effective supervision of personnel.

VES has responsibly satisfied these requirements and they are the basis of its policies for dealing with emergencies.

**EXHIBIT E-1**  
**EMERGENCY RESPONSE**  
**CONTACTS**

## FACILITY EMERGENCY COORDINATORS

Title	Emergency Coordinator	Telephone
<i>Designated</i> Emergency Coordinator (EC)	Wayne Bulsiewicz, EHS Manager 1333 N Dysart Road, Apartment #47 Avondale, AZ 85323	(602) 233-2955 Bus (602) 725-7726 Cell (623) 215-2539 Home
<i>Alternate</i> Emergency Coordinator (Alternate EC)	Mike Bomgardner, Transportation Manager 19845 West Encanto Blvd. Buckeye, AZ 85396	(602) 233-2955 Bus (602) 725-8038 Cell (623) 853-1041 Home
<i>Alternate</i> Emergency Coordinator (Alternate EC)	Scott Achbach, Operations Supervisor 18156 West East Wind Ave. Goodyear, AZ 85338	(602) 233-2955 Bus (602) 725-8453 Cell No Home Number
<i>Alternate</i> Emergency Coordinator (Alternate EC)	Tim Town, Asst. Operations Supervisor 25836 W Lynne Lane Buckeye, AZ 85326	(602) 233-2955 Bus (602) 725-7759 Cell No Home Number

## COORDINATED EMERGENCY SERVICES

Area	Agency Contact & Address	Telephone
Medical Center	<b>CONCENTRA MEDICAL CENTER</b> 5340 West Buckeye Road Ste #3 Phoenix, AZ 85043	602-233-2117
Hospital	Primary <b>MARYVALE MEDICAL CENTER-Emergency Room</b> 5102 W. Campbell Ave. Phoenix, AZ 85031	623-848-5204
Hospital	Alternate - Type I Trauma Center <b>ST. JOSEPH'S HOSPITAL &amp; MEDICAL CENTER</b> 350 W. Thomas Rd. Phoenix, AZ 85013	602-406-6560
Chemical Spill Control	<b>Veolia ES Special Services, Inc.</b> N104W13275 Donges Bay Road Germantown, WI 53022-0367 ER Dispatch	800-688-4005 24 Hour ER Number

## GOVERNMENTAL AGENCIES

Area	Agency Contact & Address	Telephone
Local	Fire/Police Department	Dial 911
State	Mark Howard, Division of Emergency Service <b>ARIZONA EMERGENCY RESPONSE COMMISSION</b> 5636 East McDowell Road Phoenix, Arizona 85008	602-464-6345
	Emergency Response Unit <b>ARIZONA DEPT. OF ENVIRONMENTAL QUALITY</b> 1110 West Washington Street Phoenix, Arizona 85012	(602) 771-2330
County	Pete Weaver <b>MARICOPA CO. EMERGENCY PLANNING COMMITTEE</b> 25630 East McDowell Road Phoenix, Arizona 85008	(602) 273-1411
National	<b>NATIONAL RESPONSE CENTER</b>	(800) 424-8802
EPA Regional	Daniel Meer Preparedness Coordinator <b>US ENVIRONMENTAL PROTECTION AGENCY</b> Region IX 75 Hawthorne Street San Francisco, California 94105	(415) 972-3132

**EXHIBIT E-2**  
**EMERGENCY EQUIPMENT**

## EMERGENCY EQUIPMENT

Item	Purpose	Location
<b>Personnel Protective Equipment</b>		
Tyvek Disposable Coveralls/Shoe Covers	Skin/clothing protection	Building #3 PPE Locker Room
TyChem SL Disposable coveralls	Skin/clothing protection	
Leather Gloves	Skin protection	
Nitrile Gloves	Skin protection	
Goggles/Safety Glasses	Eye protection	
North optical half-face or full-face, dual element respirator with CL/MV/P100 or CL/HC/SD/CD/HF/OV/P100 chemical cartridges (MSHA and NIOSH approved)	Respiratory protection	
Chemical Resistant Neoprene Gloves	Skin protection	Buildings 1, 2, 3 & 4 Spill Kits
Chemical Resistant Rubber Boots	Skin protection	Buildings 1, 2, 3 & 4 Spill Kits
<b>Spill Control/Clean-up Materials</b>		
Jerome 431 X Mercury Vapor Analyzer or equivalent	Test for presence of mercury vapors	Building #1 Retort Area and Building #3 Supervisor's Office
Mercury-Rated Vacuum Cleaner	Collection of mercury releases, mercury containing material	Building #1 Retort Area
HG-X Mercury Absorption Compound	Collection of mercury releases or spills	Building #1 Retort Area, Buildings 1, 2 & 4 Spill Kits
Waste Storage Containers <ul style="list-style-type: none"> <li>• DOT 17C Open Head Drums</li> <li>• DOT 17H Open head drums</li> <li>• DOT Poly Overpack Drums</li> <li>• 5-Gal Plastic Clean-up Pails</li> </ul>	Cleanup and containment of spills or leaks	Throughout Facility
Spill Socks	Cleanup and containment of spills or leaks	Buildings 1, 2, 3 & 4 Spill Kits
Oil Sorbent Pads	Cleanup and containment of spills or leaks	Buildings 2 & 3 Spill Kits
Acid Neutralizer	Cleanup of acid spills	Buildings 1, 2 & 4 Spill Kits
Base Neutralizer	Cleanup of base spills	Buildings 1, 2 & 4 Spill Kits

Oil Absorbent	Cleanup and containment of oil spills or leaks	Buildings 1, 2, 3 & 4 Spill Kits
<b>Fire Control Equipment</b>		
Fire Extinguishers	Extinguishing of small fires only	Throughout Facility. See Figure A-1.
<b>Other Equipment</b>		
Eyewash Stations	Eye first aid in the event of a release.	Throughout Facility See Figure A-1
Emergency Shower	Personal washing and rinsing in event of skin exposure	Buildings 3 & 4 Locker Rooms
BW Technologies Gas Alert Max 4-Gas Detector or equivalent	Test for presence of CO, H2S, LEL and O2	Building #4 Conference Room
Two-Way Radios	Emergency Communications	Located Throughout Facility (Multiple Personnel)
pH Paper	pH testing of any spilled material	Buildings 1, 2, 3 & 4 Spill Kits
Area Caution Tape	Incident command zone demarcation	Buildings 1, 2, 3 & 4 Spill Kits
Waste and DOT Labels	Drum and container labeling	Buildings 1, 2, 3 & 4 Spill Kits
Stocked First Aid Cabinet	First aid response for burns, lacerations, etc.	Building 3 Near Supervisor's Office

**EXHIBIT E-3**

**EMERGENCY RESPONSE FLOW  
CHART**

### Emergency Response Flow Chart

HAS THERE BEEN A RELEASE OF AN EXTREMELY HAZARDOUS SUBSTANCE (EHS) OR CERCLA SUBSTANCE? (CONSULT CHEMICAL INVENTORY LIST)

YES

NO

HAS TOTAL QUANTITY RELEASED EXCEEDED THE REPORTABLE QUANTITY (RQ) LIMITS?

NO RELEASE NOTIFICATION REQUIRED.

YES

NO

1. Contact Appropriate Emergency Services.
2. Oral Emergency Release Notification Required.
3. Activate Emergency Response Plan.
4. Coordinate All Required Emergency Services.
5. Written Emergency Release Notification Required.
6. Determine Return to Normal Status.

1. Activate Emergency Response Plan. (As Required)
2. Coordinate All Required Emergency Services.
3. Determine Return to Normal Status.
4. Complete Internal Written Release Notification.

**EXHIBIT E-4**  
**ORAL AND WRITTEN REPORTS FOR**  
**REPORTABLE RELEASES**

### **ORAL REPORT FOR REPORTABLE RELEASES**

- a. The name and telephone number of the individual making report.
- b. The name and address of the facility.
- c. The chemical name or identity of substance(s) released.
- d. Whether the substance is an Extremely Hazardous Substance.
- e. Estimate of quantity released.
- f. Time and duration of release.
- g. Media into which release occurred.
- h. Any known or anticipated acute or chronic health risks.
- i. Medical advice for exposed individuals, where appropriate.
- j. Precautions taken and evacuation procedures.

### **WRITTEN REPORT FOR REPORTABLE RELEASES**

---

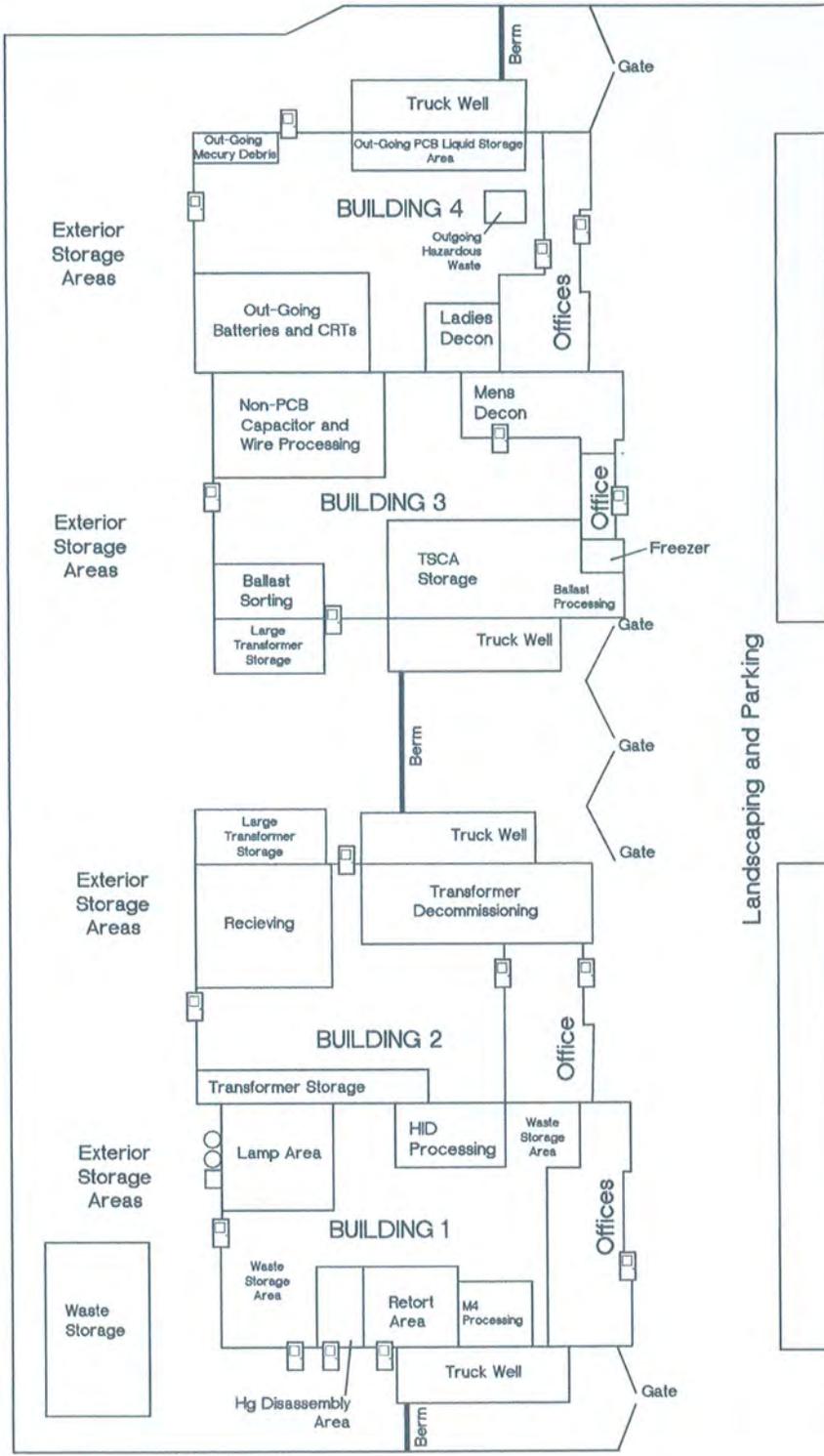
- a. The name and telephone number of the individual making report.
- b. The name and address of the facility.
- c. The chemical name or identity of substance(s) released.
- d. Whether the substance is an Extremely Hazardous Substance.
- e. Estimate of quantity released.
- f. Time and duration of release.
- g. Media into which release occurred.
- h. Any known or anticipated acute or chronic health risks.
- i. Medical advice for exposed individuals, where appropriate.
- j. Precautions taken and evacuation procedures.
- k. Actions taken to respond to and contain release.

**EXHIBIT E-5**  
**EMERGENCY PROCEDURES SUMMARY**

## EMERGENCY PROCEDURES SUMMARY

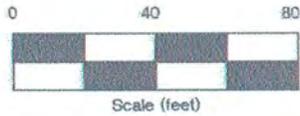
- a. Activate facility alarms and notify appropriate local assistance agencies.
- b. Identify the character, exact source, amount and extent of any released hazardous material.
- c. Assess possible direct and indirect hazards to human health or the environment that may result from the release, fire or explosion.
- d. Determine if evacuation of local off-site areas is required, and immediately notify either the government official designated as on-scene coordinator or the National Response Center.
- e. Insure that fires, explosions and releases do not occur, recur or spread to other hazardous materials at the facility.
- f. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other process equipment, if appropriate.
- g. Provide treatment, storage and disposal of any material that result from a release, fire or explosion immediately after an emergency.
- h. Ensure that no materials incompatible with the released material is processed until cleanup procedures are completed and all emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use.
- i. Notify the state and local authorities that the facility is in compliance with items (g) and (h) before operations commence.
- j. Record the time, date and details of any incident that requires implementing the Contingency Plan and submit a written report on the incident to the Arizona Department of Environmental Quality Administrator within 15 days of the incident.

**EXHIBIT E-6**  
**MAP OF THE FACILITY AND**  
**EMERGENCY EQUIPMENT**



West Jefferson Street

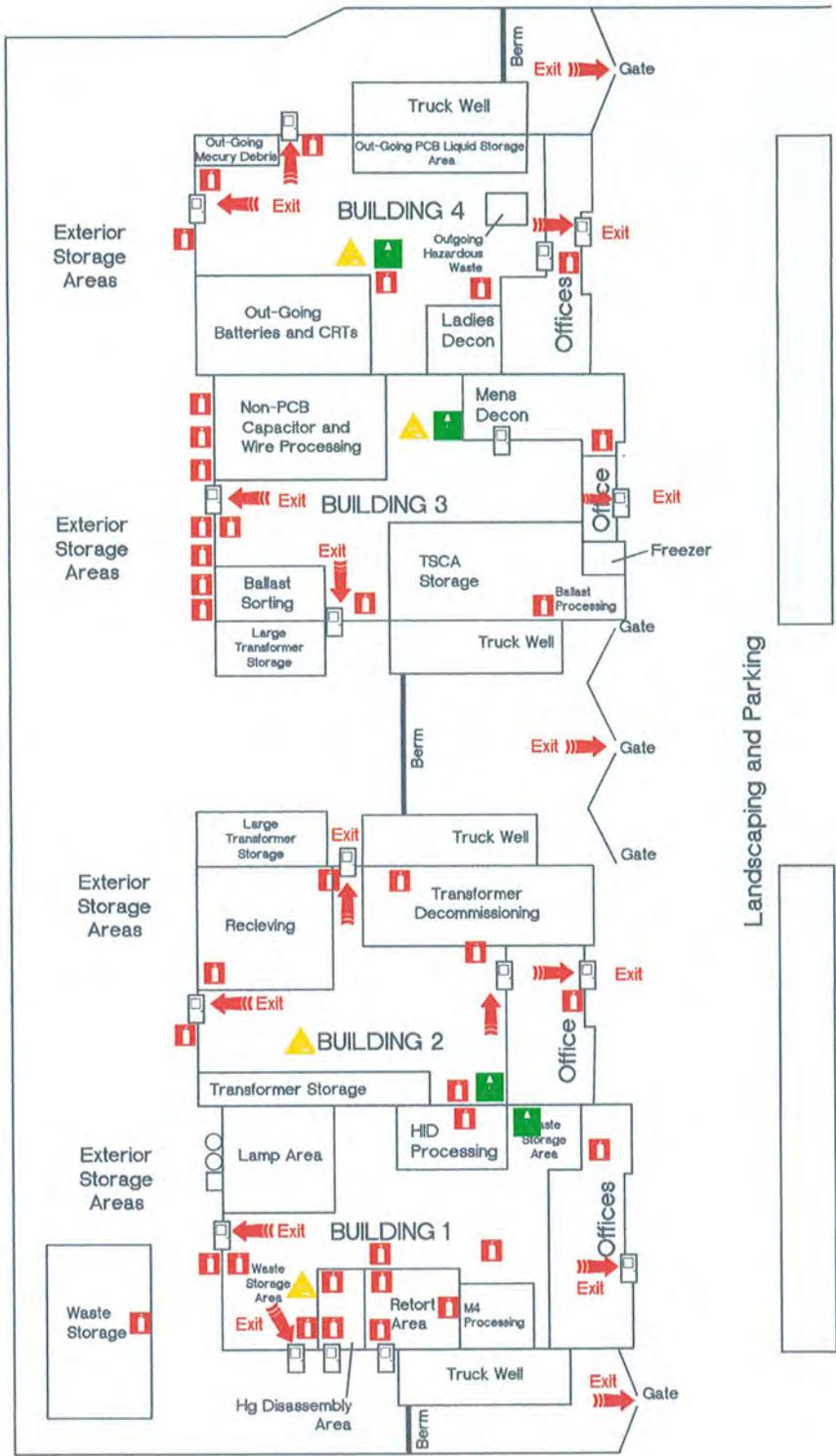
Evacuation Area



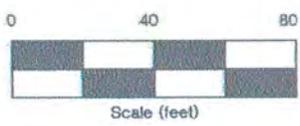
Veolia ES Technical Solutions, L.L.C.  
Site Plan  
Phoenix, Az Facility



Revision - 3/14/08



- Spill Kits
- Eye Wash Station
- Fire Extinguisher
- Evacuation Route
- Exit Doors



## Veolia ES Technical Solutions, L.L.C. Evacuation Plan

Phoenix, Az Facility



Revision - 3/14/08

**EXHIBIT E-7**  
**OPERATING LEARNING SITES**

Map	Impacted Learning Sites	Address	Phone Number	Emergency Contact	Comments
1	American Institute Of Technology	440 South 54th Avenue, Phoenix, AZ 85043	602-233-2222	Chuck Wirth	
2	Riverside Elementary School	1414 South 51st Avenue, Phoenix, AZ 85043	602-272-1339	Pamela Ecklund	
3	Carl T. Smith Middle School	4301 West Fillmore Street, Phoenix, AZ 85043	602-442-2850	Mr. Garcia	
4	Fowler Elementary School	6707 West Van Buren Street, Phoenix, AZ 85043	623-707-2500	Ms. Alma	
5	Sunridge Elementary School	6244 West Roosevelt Street, Phoenix, AZ 85043	623-707-4600	Mrs. Quezada	
6	Western Valley Elementary School	6250 West Durango Street, Phoenix, AZ 85043	623-707-2100	Nora Ulloa	
7	Western Valley Middle School	6250 West Durango Street, Phoenix, AZ 85043	623-707-2100	Heidi Watt	
8	Charles W Harris Elementary School	2252 North 55th Avenue, Phoenix, AZ 85035	623-691-4800	Dr. Martinez	
9	Palm Lane North Middle School	6339 West Monte Vista Road, Phoenix, AZ 85035	623-691-5500	Ms Spiegel	
10	Palm Lane North Elementary School	6339 West Monte Vista Road, Phoenix, AZ 85035	623-691-5500	Ms. Spiegel	
11	South Ridge High School	1122 South 67th Avenue, Phoenix, AZ 85043	623-247-0106	Kerry Clark	
12	Imagine Elementary at Desert West	6738 West McDowell Road, Phoenix, AZ 85035	623-344-7150	Chris Elliot	
13	Imagine School at Desert West	6738 West McDowell Road, Phoenix, AZ 85035	623-344-7150	Chris Elliot	
14	Omega Academy Charter School	5757 West McDowell Road, Phoenix, AZ 85035	602-269-1007	Jimmy Dean Daniels	extension 1201
15	S. Sturgeon Middle School	5757 West McDowell Road, Phoenix, AZ 85035	602-269-1007	Jimmy Dean Daniels	extension 1201
16	La Puerta High School	5757 West McDowell Road, Phoenix, AZ 85035	602-269-1007	Jimmy Dean Daniels	extension 1201

**EXHIBIT E-8**  
**OPERATING LEARNING SITES**  
**MAP**



### Environmental Permits and Approvals near Learning Sites

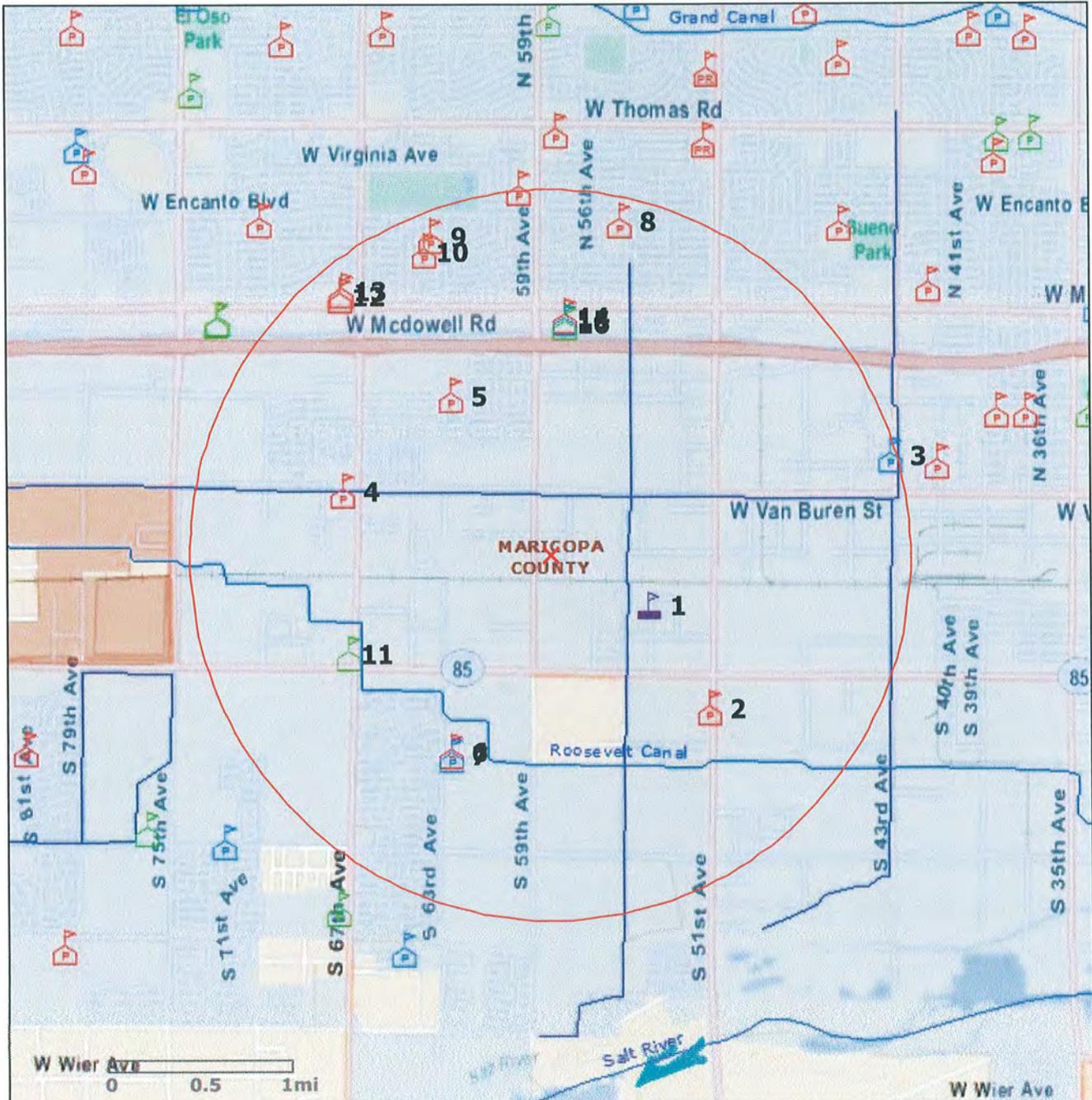
**Criteria**

Address: 5736 W Jefferson St, Phoenix, AZ, 85043

Distance: 2.0 Miles

[ [Another Search](#) ]

16 Impacted Learning Sites



~Scale 1:54470

Tue Mar 15 2011

**Impacted Learning Sites**

1	AMERICAN INSTITUTE OF TECHNOLOGY	ADULT
2	RIVERSIDE TRADITIONAL SCHOOL	PRIMARY
3	CARL T. SMITH MIDDLE SCHOOL	MIDDLE
4	FOWLER ELEMENTARY SCHOOL	PRIMARY
5	SUNRIDGE ELEMENTARY SCHOOL	PRIMARY
6	WESTERN VALLEY ELEMENTARY SCHOOL	PRIMARY
7	WESTERN VALLEY MIDDLE SCHOOL	MIDDLE
8	CHARLES W HARRIS ELEMENTARY SCHOOL	PRIMARY
9	PALM LANE NORTH	PRIMARY
10	PALM LANE ELEMENTARY SCHOOL	PRIMARY
11	SOUTH RIDGE HIGH SCHOOL	HIGH
12	IMAGINE ELEMENTARY AT DESERT WEST	PRIMARY
13	IMAGINE SCHOOL AT DESERT WEST	PRIMARY
14	OMEGA ACADEMY	PRIMARY
15	S. STURGEON MIDDLE SCHOOL	MIDDLE
16	LA PUERTA HIGH SCHOOL	HIGH

**EXHIBIT E-9**  
**LETTERS TO COORDINATED**  
**EMERGENCY SERVICE**  
**ORGANIZATIONS**

 **VEOLIA**  
ENVIRONMENTAL SERVICES

**TECHNICAL SOLUTIONS  
NORTH AMERICA**

3/21/2011

Arizona Department of Environmental Quality  
Emergency Response Unit  
1110 West Washington  
Phoenix, Arizona 85007

RE: Veolia ES Technical Solutions, L.L.C  
5736 West Jefferson Street  
Phoenix, AZ 85043  
AZ0000337360  
Facility Emergency Contingency Plan Change

Dear Emergency Response Coordinator:

Enclosed please find a revised copy of our facility contingency plan. The Contingency Plan (Attachment E of the Permit) has been updated to reflect the most current operations for our facility. In accordance with A.A.C. R18-8-270.A (40 CFR 270.42), the updates to the Contingency Plan are classified as Class 1 modifications. Veolia ES understands that because we are proposing these updates, a formal response by the Arizona Department of Environmental Quality is not anticipated

The following changes have been made to the contingency plan:

Permit Attachment E, 1.3.1 and Exhibit E-1

- Designated Wayne Bulsiewicz as the Primary Emergency Coordinator
- Removed Mike Bomgardner as the Primary Emergency Coordinator and designated Mike Bomgardner as an Alternate Emergency Coordinator
- Changed the home address and deleted the home phone number of Timothy Town, Alternate Emergency Coordinator. (Mr. Town no longer maintains a land line home phone number)
- Deleted the home phone number of Scott Achbach, Alternate Emergency Coordinator. (Mr. Achbach no longer maintains a land line home phone number)

Permit Attachment E, 3.2(c) and Exhibit E-1

- Designated Veolia ES Special Services, Inc. as the Chemical Spill Control contractor
- ~~Removed RMCAT/Belfor Environmental Services, Inc. as the Chemical Spill Control contractor. RMCAT/Belfor Environmental Services is no longer providing emergency response services for the Phoenix area.~~



Permit Attachment E, 1.1.4 and Exhibit E-1

- Changed the contact for the Arizona Emergency Response Commission to Mark Howard and changed the phone number to 602-464-6345
- Changed the contact for the Maricopa County Emergency Planning Committee to Pete Weaver phone number remains the same

Permit Attachment E, Exhibit E-3

- Removed ONYX logo from Emergency Response Flow Chart – Attachment B-3

Permit Attachment E, 5.1.2 and Exhibit E-2

- Added the words "or equivalent" to Jerome 411-X Gold Film Mercury Analyzer and BW Technologies Gas Alert Max 4 Gas Detector.

Permit Attachment E, Exhibit E-7 Operating Learning Sites

- Changed designation from Attachment H-6 to Exhibit E-7

Permit Attachment E, Exhibit E-8 Operating Learning Sites Map

- Changed designation from Figure H-2 to Exhibit E-8

Copies of the revised Contingency Plan have been submitted to the agencies and companies listed in Permit Attachment E 1.1.4 and Exhibit E-1.

If you have any questions regarding the Contingency Plan, please contact me at 602-233-2955.

Sincerely,

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.



Wayne Bulsiewicz

EHS Manager

Enclosure:



**TECHNICAL SOLUTIONS  
NORTH AMERICA**

3/21/2011

Mr. Anthony Leverock  
Arizona Department of Environmental Quality  
Hazardous Waste Permits Unit  
1110 West Washington Street  
Phoenix, Arizona 85007

RE: Facility Emergency Contingency Plan Change  
Veolia ES Technical Solutions, L.L.C.  
5736 West Jefferson Street  
Phoenix, AZ 85043  
EPA ID Number AZ0000337360

Dear Mr. Leverock:

Enclosed please find a revised copy of our facility contingency plan. The Contingency Plan (Attachment E of the Permit) has been updated to reflect the most current operations for our facility. In accordance with A.A.C. R18-8-270.A (40 CFR 270.42), the updates to the Contingency Plan are classified as Class 1 modifications. Veolia ES understands that because we are proposing these updates, a formal response by the Arizona Department of Environmental Quality is not anticipated

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Permit Attachment E, Exhibit E-3

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Permit Attachment E, 5.1.2 and Exhibit E-2

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Copies of the revised Contingency Plan have been submitted to the agencies and companies listed in Permit Attachment E 1.1.4 and Exhibit E-1.

If you have any questions regarding the Contingency Plan, please contact me at 602-233-2955.

Sincerely,

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

  
Wayne Bulsiewicz  
EHS Manager

Enclosure:



**VEOLIA**  
ENVIRONMENTAL SERVICES

**TECHNICAL SOLUTIONS  
NORTH AMERICA**

3/21/2011

Mr. Mark Howard  
Division of Emergency Services  
Arizona Emergency Response Commission  
5636 East McDowell Road  
Phoenix, Arizona 85008

RE: Facility Emergency Contingency Plan Change  
Veolia ES Technical Solutions, L.L.C.  
5736 West Jefferson Street  
Phoenix, AZ 85043  
EPA ID Number AZ0000337360

Dear Mr. Howard:

Enclosed please find a revised copy of our facility contingency plan. The Contingency Plan (Attachment E of the Permit) has been updated to reflect the most current operations for our facility. In accordance with A.A.C. R18-8-270.A (40 CFR 270.42), the updates to the Contingency Plan are classified as Class 1 modifications. Veolia ES understands that because we are proposing these updates, a formal response by the Arizona Department of Environmental Quality is not anticipated

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Permit Attachment E, 5.1.2 and Exhibit E-2

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Permit Attachment E, Exhibit E-7 Operating Learning Sites

- Changed designation from Attachment H-6 to Exhibit E-7

Permit Attachment E, Exhibit E-8 Operating Learning Sites Map

- Changed designation from Figure H-2 to Exhibit E-8

Copies of the revised Contingency Plan have been submitted to the agencies and companies listed in Permit Attachment E 1.1.4 and Exhibit E-1.

If you have any questions regarding the Contingency Plan, please contact me at 602-233-2955.

Sincerely,

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

Wayne Bulsiewicz  
EHS Manager

Enclosure:



**TECHNICAL SOLUTIONS  
NORTH AMERICA**

3/21/2011

Emergency Coordinator  
Concentra Medical Center  
5340 West Buckeye Road, Ste #3  
Phoenix, AZ 85043

RE: Facility Emergency Contingency Plan Change  
Veolia ES Technical Solutions, L.L.C.  
5736 West Jefferson Street  
Phoenix, AZ 85043  
EPA ID Number AZ0000337360

Dear Emergency Coordinator:

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Permit Attachment E, 1.1.4 and Exhibit E-1

Veolia ES Technical Solutions, L.L.C.  
5736 West Jefferson, Phoenix, AZ 85043  
tel: 602 233 2955 fax: 602 415 3030  
[www.VeoliaES.com](http://www.VeoliaES.com)



- Changed the contact for the Arizona Emergency Response Commission to Mark Howard and changed the phone number to 602-464-6345
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Permit Attachment E, Exhibit E-3

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Permit Attachment E, 5.1.2 and Exhibit E-2

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- Changed designation from Figure H-2 to Exhibit E-8

Copies of the revised Contingency Plan have been submitted to the agencies and companies listed in Permit Attachment E 1.1.4 and Exhibit E-1.

If you have any questions regarding the Contingency Plan, please contact me at 602-233-2955.

Sincerely,

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

  
Wayne Bulsiewicz  
EHS Manager

Enclosure:



**TECHNICAL SOLUTIONS  
NORTH AMERICA**

3/21/2011

Mr. Daniel Meer  
US Environmental Protection Agency, Region IX  
Preparedness Coordinator  
75 Hawthorne Street  
San Francisco, CA 94105

RE: Facility Emergency Contingency Plan Change  
Veolia ES Technical Solutions, L.L.C.  
5736 West Jefferson Street  
Phoenix, AZ 85043  
EPA ID Number AZ0000337360

Dear Mr. Meer:

Enclosed please find a revised copy of our facility contingency plan. The Contingency Plan (Attachment E of the Permit) has been updated to reflect the most current operations for our facility. In accordance with A.A.C. R18-8-270.A (40 CFR 270.42), the updates to the Contingency Plan are classified as Class 1 modifications. Veolia ES understands that because we are proposing these updates, a formal response by the Arizona Department of Environmental Quality is not anticipated

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- Removed RMCAT/Belfor Environmental Services, Inc. as the Chemical Spill



Control contractor. RMCAT/Belfor Environmental Services is no longer providing emergency response services for the Phoenix area.

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Permit Attachment E, 5.1.2 and Exhibit E-2

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- Changed designation from Attachment H-6 to Exhibit E-7

Permit Attachment E, Exhibit E-8 Operating Learning Sites Map

- Changed designation from Figure H-2 to Exhibit E-8

Copies of the revised Contingency Plan have been submitted to the agencies and companies listed in Permit Attachment E 1.1.4 and Exhibit E-1.

If you have any questions regarding the Contingency Plan, please contact me at 602-233-2955.

Sincerely,

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

  
Wayne Bulsiewicz  
EHS Manager

Enclosure:



**VEOLIA**  
**ENVIRONMENTAL SERVICES**

**TECHNICAL SOLUTIONS**  
**NORTH AMERICA**

3/21/2011

Mr. Ronald Leach, Project Manager  
RCRA Corrective Action Office (WST-5),  
Waste Management Division, US EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105-3920

RE: Facility Emergency Contingency Plan Change  
Veolia ES Technical Solutions, L.L.C.  
5736 West Jefferson Street  
Phoenix, AZ 85043  
EPA ID Number AZ0000337360

Dear Mr. Leach:

Enclosed please find a revised copy of our facility contingency plan. The Contingency Plan (Attachment E of the Permit) has been updated to reflect the most current operations for our facility. In accordance with A.A.C. R18-8-270.A (40 CFR 270.42), the updates to the Contingency Plan are classified as Class 1 modifications. Veolia ES understands that because we are proposing these updates, a formal response by the Arizona Department of Environmental Quality is not anticipated

The following changes have been made to the contingency plan:

Permit Attachment E, 1.3.1 and Exhibit E-1

- Designated Wayne Bulsiewicz as the Primary Emergency Coordinator
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Permit Attachment E, 3.2(c) and Exhibit E-1

- Designated Veolia ES Special Services, Inc. as the Chemical Spill Control contractor
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Permit Attachment E, 1.1.4 and Exhibit E-1

- Changed the contact for the Arizona Emergency Response Commission to Mark Howard and changed the phone number to 602-464-6345
- Changed the contact for the Maricopa County Emergency Planning Committee to Pete Weaver phone number remains the same

Permit Attachment E, Exhibit E-3

- Removed ONYX logo from Emergency Response Flow Chart – Attachment B-3

Permit Attachment E, 5.1.2 and Exhibit E-2

- Added the words "or equivalent" to Jerome 411-X Gold Film Mercury Analyzer and BW Technologies Gas Alert Max 4 Gas Detector.

Permit Attachment E, Exhibit E-7 Operating Learning Sites

- Changed designation from Attachment H-6 to Exhibit E-7

Permit Attachment E, Exhibit E-8 Operating Learning Sites Map

- Changed designation from Figure H-2 to Exhibit E-8

Copies of the revised Contingency Plan have been submitted to the agencies and companies listed in Permit Attachment E 1.1.4 and Exhibit E-1.

If you have any questions regarding the Contingency Plan, please contact me at 602-233-2955.

Sincerely,

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

  
Wayne Bulsiewicz  
EHS Manager

Enclosure:



**TECHNICAL SOLUTIONS  
NORTH AMERICA**

3/21/2011

Mr. Dean Pedrotti, Fire Captain  
Phoenix Fire Department  
Fire Prevention, Special Hazards Unit  
150 S. 12<sup>th</sup> Street  
Phoenix, Arizona 85034-2301

RE: Facility Emergency Contingency Plan Change  
Veolia ES Technical Solutions, L.L.C.  
5736 West Jefferson Street  
Phoenix, AZ 85043  
EPA ID Number AZ0000337360

Dear Mr. Pedrotti:

Enclosed please find a revised copy of our facility contingency plan. The Contingency Plan (Attachment E of the Permit) has been updated to reflect the most current operations for our facility. In accordance with A.A.C. R18-8-270.A (40 CFR 270.42), the updates to the Contingency Plan are classified as Class 1 modifications. Veolia ES understands that because we are proposing these updates, a formal response by the Arizona Department of Environmental Quality is not anticipated.

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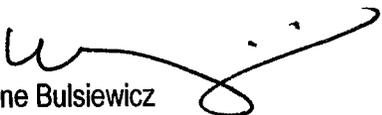
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Copies of the revised Contingency Plan have been submitted to the agencies and companies listed in Permit Attachment E 1.1.4 and Exhibit E-1.

If you have any questions regarding the Contingency Plan, please contact me at 602-233-2955.

Sincerely,

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

  
Wayne Bulsiewicz  
EHS Manager

Enclosure:



**TECHNICAL SOLUTIONS  
NORTH AMERICA**

3/21/2011

Mr. Pete Weaver  
Maricopa County Emergency Planning  
2035 North 52<sup>nd</sup> Street  
Phoenix, Arizona 85008

RE: Facility Emergency Contingency Plan Change  
Veolia ES Technical Solutions, L.L.C.  
5736 West Jefferson Street  
Phoenix, AZ 85043  
EPA ID Number AZ0000337360

Dear Mr. Weaver:

Enclosed please find a revised copy of our facility contingency plan. The Contingency Plan (Attachment E of the Permit) has been updated to reflect the most current operations for our facility. In accordance with A.A.C. R18-8-270.A (40 CFR 270.42), the updates to the Contingency Plan are classified as Class 1 modifications. Veolia ES understands that because we are proposing these updates, a formal response by the Arizona Department of Environmental Quality is not anticipated.

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Permit Attachment E, 5.1.2 and Exhibit E-2

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Sincerely,

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

  
Wayne Bulsiewicz  
EHS Manager

Enclosure:



**TECHNICAL SOLUTIONS  
NORTH AMERICA**

3/21/2011

Emergency Coordinator  
Maryvale Medical Center  
5102 West Campbell Avenue  
Phoenix, AZ 85031

RE: Facility Emergency Contingency Plan Change  
Veolia ES Technical Solutions, L.L.C.  
5736 West Jefferson Street  
Phoenix, AZ 85043  
EPA ID Number AZ0000337360

Dear Emergency Coordinator:

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Permit Attachment E, 1.1.4 and Exhibit E-1

Veolia ES Technical Solutions, L.L.C.  
5736 West Jefferson, Phoenix, AZ 85043  
tel: 602 233 2955 fax: 602 415 3030  
www.VeoliaES.com



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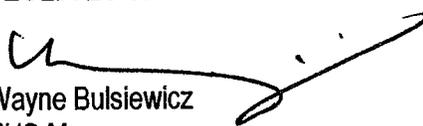
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If you have any questions regarding the Contingency Plan, please contact me at 602-233-2955.

Sincerely,

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

  
Wayne Bulsiewicz  
EHS Manager

Enclosure:



**TECHNICAL SOLUTIONS  
NORTH AMERICA**

3/21/2011

Emergency Coordinator  
City of Phoenix Police Department  
Maryvale Precinct  
6180 W. Encanto  
Phoenix, Arizona 85043

RE: Facility Emergency Contingency Plan Change  
Veolia ES Technical Solutions, L.L.C.  
5736 West Jefferson Street  
Phoenix, AZ 85043  
EPA ID Number  
AZ0000337360

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Sincerely,

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

  
Wayne Bulsiewicz  
EHS Manager

Enclosure:



**TECHNICAL SOLUTIONS  
NORTH AMERICA**

3/21/2011

Emergency Coordinator  
St. Joseph Hospital and Medical Center  
350 West Thomas Rd.  
Phoenix, Arizona 85013

RE: Facility Emergency Contingency Plan Change  
Veolia ES Technical Solutions, L.L.C.  
5736 West Jefferson Street  
Phoenix, AZ 85043  
EPA ID Number AZ0000337360

Dear Emergency Coordinator:

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Sincerely,

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

  
Wayne Bulsiewicz  
EHS Manager

Enclosure:



**VEOLIA**  
ENVIRONMENTAL SERVICES

**TECHNICAL SOLUTIONS  
NORTH AMERICA**

3/21/2011

Natalie Splawski  
Veolia ES Special Services, Inc.  
N104W13275 Donges Bay Rd.  
Germantown, WI 53022-0367

RE: Facility Emergency Contingency Plan Change  
Veolia ES Technical Solutions, L.L.C.  
5736 West Jefferson Street  
Phoenix, AZ 85043  
EPA ID Number AZ0000337360

Dear Ms Splawski:

Enclosed please find a revised copy of our facility contingency plan. The Contingency Plan (Attachment E of the Permit) has been updated to reflect the most current operations for our facility. In accordance with A.A.C. R18-8-270.A (40 CFR 270.42), the updates to the Contingency Plan are classified as Class 1 modifications. Veolia ES understands that because we are proposing these updates, a formal response by the Arizona Department of Environmental Quality is not anticipated

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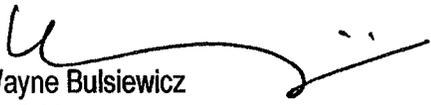
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VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

  
Wayne Bulsiewicz  
EHS Manager

Enclosure: