

## ATTACHMENT 4 CONTINGENCY PLAN

### 4.0 Abstract

#### PURPOSE:

This plan describes the proper action to be taken by employees during an emergency.

#### RESPONSIBILITIES:

The emergency coordinator or alternate is responsible for implementing the plan during an emergency.

#### EMERGENCY COORDINATOR

The facility manager is the emergency coordinator. The alternate emergency coordinator is also a trained employee designated by the facility manager. See Appendix F-1 (“Emergency Contact List”) for person so designated.

#### EMERGENCY NOTIFICATIONS:<sup>1</sup>

Chandler Police Department	(480) 899-9740 or 911
Chandler Fire Department through Phoenix Dispatch center	(602) 253-1191 or 911
Chandler Regional Hospital	(480) 963-4561
Safety-Kleen Emergency Coordinator (24 hour)	(800) 468-1760
Arizona Department of Environmental Quality	(602) 771-2300 or (800) 234-5677
Arizona Department of Public Safety	(602) 223-2000
Arizona Department of Transportation	(602) 255-7744
National Response Center	(800) 424-8802
USEPA Emergency Response Hotline	(415) 744-2000

### 4.1 Purpose

The contingency plan describes the actions to be taken by each employee in the event of a spill, fire or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous materials to the air, soil, surface water, or groundwater.

The Contingency Plan is to be carried out immediately whenever there is a release of hazardous waste, constituent, or material that:

- a. Could threaten human health or the environment [40 CFR 264.51(b)],
- b. Is a spill which constitutes a release of a reportable quantity of a hazardous substance under Section 103 of the Comprehensive Emergency Response, Clean-up, and Liability Act (CERCLA) [40 CFR 302] or Section 311 of the Clean Water Act (CWA) [40 CFR 117], or as defined in Appendix F-7 (“Reportable Quantities”) by DOT,

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<sup>1</sup> See Appendix F “Emergency Notifications” for a more detailed listing.

- c. Is a hazardous substance which constitutes a major spill as defined by ADEQ Policy as follows;
  - (i) Greater than 55 gallons within a coated secondary containment area,
  - (ii) Greater than 5 gallons (of a liquid) on site, but outside of coated secondary containment, and / or,
  - (iii) Greater than 50 pounds (of a solid) on site, but outside of coated secondary containment.

In the event of a fire or explosion the Contingency Plan is implemented upon notification of the Fire Department.

## **4.2 Emergency Coordinator Responsibilities**

The emergency coordinator is responsible for implementing the contingency plan during an emergency; however, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan should the emergency coordinator or his alternate be unavailable. The branch manager is the emergency coordinator and a qualified designee is the alternate emergency coordinator (see Appendix F-1 [“Emergency Contact List”]). The emergency coordinator and alternate emergency coordinator must be familiar with all aspects of this contingency plan, the operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility, and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the contingency plan. Their home addresses and telephone numbers, as well as the office telephone number, are listed in Appendix F-1 (“Emergency Contact List”). Also listed in Appendix F-2 (“Employees’ Function During An Emergency”) are the assigned duties of each employee during an emergency. At least one employee will be at the facility or on call (available to reach the facility within a short period of time) at all times to respond to an emergency situation.

### **4.2.1 Responsibilities During An Emergency**

- a. Immediate Notifications  
Whenever there is an imminent or actual emergency situation, the emergency coordinator (or alternate emergency coordinator when the emergency coordinator is not available) will immediately:
  - (i) Activate the internal facility communication system by voice, intercom (the quickest, safest method), or both to notify all facility personnel to begin emergency procedures;
  - (ii) Notify Safety-Kleen’s Environment, Health, and Safety Department using the 24-hour telephone number – (800) 468-1760;
  - (iii) Notify appropriate state or local agencies with designated response roles, if necessary.; and
  - (iv) Make any other immediate notifications or reports, as required by section 4.3.3 “Reporting Requirements”.

b. Incident Identification

Whenever there is a release, fire, or explosion, the emergency coordinator (or alternate emergency coordinator) must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do this by observation or by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis. The analysis performed will be for the components in the material spilled as indicated in Appendices D-1 "Parameters and Rationale for Hazardous Waste Selection", D-2 "Parameters and Test Methods/ Frequency", D-3 "Methods Used to Sample Hazardous Wastes", D-4 "Qualitative Acceptance criteria" and pursuant to the Decontamination, Sampling and Analytical Testing Plan (DSAT, Table 4-1). If a contract laboratory is used to perform analyses, then the Permittee shall inform the laboratory in writing that it must operate under the conditions set forth in this permit. Each parameter test that the in-state or out-of-state laboratory can perform for hazardous waste analysis must be licensed (certified) by the ADHS [ARS Title 36, Chapter 4.3, Article 1, Section §36-495.01]. for notification and certification purposes, a copy of that written notification will be included in the final clean-up report submitted to ADEQ.

c. Hazard Assessment

During all phases of the emergency, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off). Methods for assessment are contained in the Hazardous and Exposure Assessment Plan (HEAP, Table 4-2), and any required air monitoring shall be according to the DSAT (Table 4-1).

d. Measures to Prevent Recurrence or Spread

During an emergency, the emergency coordinator (or alternate) must take measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste storage areas at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers. If the facility stops operations, the emergency coordinator must monitor for leaks, pressure build-up, gas generation, or rupture in valves, pipes or other equipment.

e. Post Emergency Responsibilities

Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other materials that result from a release, fire, or explosion at the facility.

#### **4.2.2 Remedial Action Responsibilities**

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator must contact the Safety-Kleen's Environment, Health, and Safety Department to report the incident. The treatment, storage and/or disposal of any recovered waste, contaminated soil or surface water that results from an

emergency situation must be arranged by Safety-Kleen and carried out as expeditiously as possible.

The emergency coordinator must ensure that, in the affected area(s) of the facility:

- a. No substance that may be incompatible with the released material is brought on site until cleanup procedures are completed; and
- b. All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

#### **4.2.3 Reporting Responsibilities**

If the emergency coordinator determines that the facility has had a fire, explosion, and / or release that could threaten human health or the environment, the coordinator must report those findings as follows:

- a. If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities. The emergency coordinator will be available to help appropriate officials decide whether local areas should be evacuated.
- b. The coordinator must immediately notify the Safety-Kleen Environment, Health, and Safety Department. The Safety-Kleen Environment, Health, and Safety Department will immediately report the incident to the ADEQ. The report will include:
  - (i) Name and telephone number of notifier;
  - (ii) Name and address of facility;
  - (iii) Time and type of incident (e.g., release, fire);
  - (iv) Name and quantity of material(s) involved, to the extent known;
  - (v) The extent of injuries, if any; and
  - (vi) The possible hazards to human health, or the environment outside the facility.
- c. The emergency coordinator shall also immediately report the above information to the National Response Center if the fire, explosion, or release could threaten human health or the environment outside the facility.
- d. Safety-Kleen will notify the appropriate state and local authorities that the facility is in compliance with section 4.3.4 "Post-Mitigation Cleanup Plan" before operations are resumed in the effected area(s) of the facility.
- e. The emergency coordinator or alternate must document the time, date, and details of any incident that requires the implementation of the contingency plan. Within 15 days of the incident, Safety-Kleen will submit a written report on the incident to the ADEQ. The report must include:
  - (i) Name, address, and telephone number of the owner or operator;
  - (ii) Name, address, and telephone number of the facility;
  - (iii) Date, time, and type of incident (e.g., Fire, explosion);

- (iv) Name and quantity of material(s) involved;
- (v) The extent of injuries, if any;
- (vi) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- (vii) Estimated quantity and disposition of recovered material that results from the incident.

The Branch Manager must note on the Facility Operations Record that an incident requiring implementation of the Contingency Plan occurred including the time, date and details of the incident.

- f. To comply with 40 CFR 264.196(d) requirements, if there is a leaking tank, the following items apply:
  - (i) Any release to the environment must be reported to the ADEQ within 24 hours of detection.
  - (ii) Exempted from 40 CFR 264.196(d) requirements are a leak or spill of hazardous waste that is:
    - (a) Less than or equal to a quantity of one pound, and
    - (b) Immediately contained and cleaned up.
  - (iii) Within thirty days of detection of a release to the environment, a report containing the information in 40 CFR 264.196(d)(3) must be submitted to ADEQ.
- g. Semiannual reports of leaks from air emission regulated equipment is contained in 40 CFR 264.1065(a)(3).

**4.2.4 Chain of Command**

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

- a. The person who discovers/causes the spill reports to the Emergency Coordinator or alternate,
- b. The Emergency Coordinator contacts the Safety-Kleen Environment, Health, and Safety Department.
- c. Safety-Kleen’s Environment, Health, and Safety Department reports to ADEQ.

**4.2.5 Government Agencies and Local Authorities to be Notified**

During an emergency, the following government agencies and local authorities may be contacted:

Agency or Authority	Rationale
Branch Manager (480) 940-7202	Primary Emergency Coordinator
Customer Service Manager (480) 940-7202	Alternate Emergency Coordinator
Police Department	Notify if there is imminent danger to human health

(480) 782-4130 or 911	
Fire Department (602) 253-1191 or 911	Notify if there is a fire, uncontrolled spill, or other imminent danger
Hospital (480) 963-4561 or 911	Notify if there are any injuries
ADEQ (602) 771-2300	Report releases, explosions, and fires
Clean Up Contractors (800) 468-1760	Call to assist with remedial action after a release
National Response Center (800) 424-8802	Report releases, explosions, or fires that could threaten outside the facility

Arrangements have been made to familiarize the:

- a. Police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility, and possible evacuation routes.
- b. Local hospital with the types of injuries or illnesses that could result from fires, explosions, or releases at the facility.

Copies of the letters to the local police department, fire department, and hospital are located on file at the facility.

### 4.3 Emergency Response Procedures

The initial response to any fire, explosion, or hazardous material release will be to protect human health and safety, and then the environment. Identification, containment, treatment, and disposal assessment will be the secondary response.

The following general procedures will be used for a rapid and safe response and control of all situations (minor emergencies shall address the following as appropriate). Response actions to be taken in specific emergency situations are described in section 4.3.1 “Minor Spills”, section 4.3.2 “Major Spills”, and section 4.3.3 “Fire And / Or Explosions” which follow and the “Material Safety Data Sheets” obtained by 3E, on Lotus Notes, or located in the warehouse.

- a. Discontinue Work Activity and Report Incident - if an employee discovers a spill or release, the employee will immediately report it (by radio, phone, alarm, etc.) to the emergency coordinator (EC) all material handling activities in the area shall be halted. The EC will contact the appropriate emergency response teams and agencies as described above, 4.2.1.1 “Immediate Notifications.”
- b. Medical Rescue and Treatment - all injured people will be removed, and emergency medical treatment will be administered by qualified personnel.
- c. Building / Area Evacuation and Isolation - the area will be cleared of all personnel not actively involved in the release, or fire, pursuant to section 4.4 “Evacuation Plan”.

- d. Incident Identification and Hazard Assessment - the character, source, and extent of the release, fire, or explosion will be identified and the hazards to human health and the environment will be assessed as described in section 4.2.1.2 "Identification" and section 4.2.1.3 "Assessment."
- e. Incident Mitigation, Confinement, and Containment - the general guidelines are:
  - Wear personal protective equipment according to the type of hazard involved as required in Table 4-4 "PPE"
  - Take all measure to prevent the occurrence, recurrence, or spread of fires, explosions, or releases as described in section 4.2.1.3.
  - Use methods and guidance from Table 4-3 (MCC Plan) as appropriate.
- f. Incident Mitigation "All Clear" Signal - the EC will determine when the emergency has passed and give the "all clear" signal when personnel are no longer endangered. Post emergency clean up shall be implemented as described in section 4.2.2 "Remedial Action Responsibilities" and section 4.3.4 "Post Mitigation Clean Up Procedures."

#### **4.3.1 Minor Spills**

A minor spill is one which (whether on or off pavement, within or outside of secondary containment) can be cleaned up without the aid of outside assistance. Following the instructions of the appropriate "Material Safety Data Sheet", the worker will enter the area (including both indoor and outdoor spills) wearing gloves, apron, safety glasses, and / or respirator as instructed by the MSDS), collect the liquid into a container and return it to storage. Should the spill occur outside containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

- a. Paved Area - if the material spills on a paved area, it must be collected with absorbent material. The absorbents will be collected, containerized, and transported to a Safety-Kleen Recycle Center for proper disposal.
- b. Unpaved Area - if the solvent spills on an unpaved area, the free solvent must be collected with absorbent material. The absorbent material and any contaminated soil will be collected in a container and transported to a Safety-Kleen Recycle Center for proper disposal.

If a spill occurs while moving or delivering containers outside of the warehouse, the response actions described in 4.3.1.a and 4.3.1.b, above, must be followed. However, should the spill occur in containment, the following actions will take place:

- c. Return and Fill Containment - if a spill should occur while pouring spent parts washer solvent into a drum washer unit or filling containers with solvent product at the return and fill station, and it is contained in the secondary containment, remedial action will not be necessary.

If solvent is spilled in a non-explosion rated area or is flowing, ensure that all sources of ignition are removed (switches are not operated, motors are not operated, use proper bonding and grounding, etc.)

- d. Warehouse Containment - spills inside the warehouse will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors should be opened to improve the ventilation in the confined area. There are no manually opening windows in the warehouse, only permanently opened louvers high up on the walls, and non-opening skylight windows.

Spilled or leaked waste contained in the sump in the container storage area will be removed using an intrinsically safe wet / dry vacuum cleaner. Detergent can be used as needed with this vacuum cleaner. The sump is a blind sump with no associated piping. The removal of any liquid in the sump must take place immediately.

- e. Tank Containment - if a spill to the containment dike occurs, the spilled material must be completely removed in a timely manner. Should water be present when a spill occurs, all of the liquid must be treated as hazardous waste and it must be pumped with an appropriate pump to the spent parts washer solvent tank, containers, a portable tank, or tank truck.

#### **4.3.2 Major Spills**

Any spill which cannot be completely remediated using the methods described in 'a' and 'b' of section 4.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure or a fire. Spilled material that escapes collection can contaminate soil, surface water, ground water, sanitary sewer systems and storm sewer systems. Emergency response to this type of spill should be as follows:

- a. Assist any injured people.
- b. Stop the flow of material, if possible. (see Table 4-3, "Guidance for Mitigation, Confinement, and Containment Methods", for possible methods.)
- c. Retain, contain, or slow the flow of the material if it can not be stopped. (i.e., Use Earth / sand / sandbags, inert material, or another method listed in Table 4-3 to contain / divert the spill.)
- d. If material escapes containment efforts immediately:
  - Call the local Fire Department,
  - Report to the emergency coordinator (or alternate), and
  - Report to Safety-Kleen Environment, Health, and Safety Department.
- e. Immediately recover the spilled material to reduce property and environmental damage. Spilt or leaked waste will be removed / recovered immediately by using either absorbent material, or pump, recontainerized, and handled as hazardous waste:

- Use standard industrial absorbent or absorbent booms or pads (depending on the size of the spill and / or the wet / dry vacuum as needed,
- If the spill is of such magnitude that absorbent will not be adequate, then an intrinsically safe pump will be used to remove the liquids.

The emergency coordinator or alternate shall report any incident as soon as possible to the Safety-Kleen Environment, Health, and Safety Department using the 24-hour telephone number: 800-468-1760. If the Safety-Kleen Environment, Health, and Safety Department does not respond within thirty (30) minutes, the emergency coordinator shall:

- a. Call an emergency cleanup contractor, if it is deemed necessary, and
- b. Report the incident to:
  - National Response Center if the threat extends outside the facility,
  - ADEQ, and
  - Arizona Department of Public Safety (DPS) Duty Officer.

If the Safety-Kleen Environment, Health, and Safety Department does respond within thirty (30) minutes, the EHS Department will inform the emergency coordinator that the EHS staff will make the required contacts, and will proceed to contact the proper authorities.

The person reporting the spill will be prepared to provide the following information:

- Reporting person's name,
- Reporting person's position,
- Reporting person's company name,
- Company address,
- Company telephone number,
- A description of the material spilled,
- The amount of material spilled,
- The status of the response effort,
- Anticipated effects on and off site, and any assistance needed.

Contaminated material resulting from remedial actions for major spills, will usually be disposed of (see section 4.3.4 "Post Mitigation Cleanup Plan") at a properly permitted treatment or disposal facility since the quantity of waste material will probably exceed the storage capacity of the Safety-Kleen recycle center.

Spills greater than one pound must be recorded on a "Field Spill Report Form," (see Appendix F-6). A copy of this report is sent to appropriate the Safety-Kleen Environment, Health, and Safety Department. Spill report forms and other appropriate information are reviewed with branch personnel to prevent similar spills from occurring in the future.

The Safety-Kleen Environmental, Health and Safety Department will notify ADEQ within 24 hours of detection of any release of wastes to the environment.

### **4.3.3 Fire Control Procedures**

**Note: If a fire or explosion causes a release of hazardous substances, section 4.3.1, “Minor Spills” and section 4.3.2 “Major Spills” will also be followed, as applicable.**

In the event a fire occurs or the discovery of a fire, smoke, or unauthorized discharge of flammable or toxic materials on the property, personnel will immediately report such condition to the fire department by telephoning “911.” Personnel must act quickly with the fire extinguisher to put out the fire before it spreads. If the fire cannot be extinguished quickly, immediately evacuate the facility.

A fire means any fire not used for cooking, heating, or recreational purposes, or not incidental to the normal operations of the facility.

Unauthorized discharge means any release or emission of any material in a manner that does not conform to the provisions of the Uniform Fire Code, or applicable public health and safety regulations.

The type of wastes and products that are stored in the three areas of the facility (warehouse, return and fill station, and above ground storage tanks) are shown in the Waste Analysis Plan, Section 2.0 et. seq. All the following materials are stored in the warehouse, whereas only solvent and sediment are stored in one above ground storage tank and return and fill station; used antifreeze is stored in the other above ground storage tank. A fire in the warehouse can best be extinguished by foam, water fog, or water spray.

1. Parts Washer Solvent and Sediment and Immersion Cleaner

The classification for Safety-Kleen’s parts washer solvent (flash point 105° F) and immersion cleaner (flash point 140° F) is NFPA-30 Class II – Combustible Liquid. These fires can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a confined area, if possible. The flame should not be extinguished until the flow of solvent has been stopped. Then attention should be directed immediately to extinguishing the flame.

2. Dry Cleaner Waste

Dry cleaner wastes are not flammable but may produce toxic vapors at high temperatures (above about 1200° F). Uncontrolled combustion products of dry cleaner waste may include carbon dioxide, carbon monoxide, hydrochloric acid, phosgene and other toxic gases. Should a fire potentially impact containers of dry cleaner waste:

- a. Isolate the hazard area and deny entry to unauthorized personnel,
- b. Stay upwind, stay out of low areas,
- c. Ventilate closed spaces before entering them,
- d. Wear self contained breathing apparatus (SCBA) and protective clothing, and
- e. Evacuate a 600-foot radius area endangered by the gas.

3. Paint Waste

The NFPA-30 classification for paint waste (flash point <70° F) is Class IB –Flammable Liquid. Combustion of paint waste can generate carbon monoxide and other toxic gases. Therefore, it is

important to wear SCBA and full protective clothing in the effected area. If a fire may impact paint wastes:

- a. Isolate the hazard area and deny entry to unauthorized personnel,
- b. Stay upwind, stay out of low areas, and
- c. Wear SCBA and protective clothing.

A dry chemical, carbon dioxide, or foam will best extinguish the fire. Cool the containers with water until well after the fire has been extinguished.

#### 4. Spent Aqueous-Based Parts Cleaner

The MSDS for this product states that the product is non-combustible and indicates no incompatibilities with other wastes at Safety-Kleen. However, if involved in a fire, toxic gases may be produced. When this material is a waste, it is expected to contain some (<2 ppm) chlorinated solvent [see for example, Appendix D-5 (“Statistical Analysis of Annual Waste Characterization Data and Data Summary for 2002”)].

#### 5. Used Antifreeze

The MSDS for this material as a product states that the product is non-combustible and indicated no incompatibilities with other wastes at Safety-Kleen. However, if involved with a fire, toxic gases may be produced. PPE is required when handling this material.

### 4.3.4 Post Mitigation Cleanup Plan

After the fire, explosion, release, or spill has been effectively mitigated, the effected areas shall be marked off (using rope, ribbon, barrier tape, or other means), signs shall be placed in obvious locations which should read “This Storage Area Is Closed”, and the area shall be cleaned up (containerized, decontaminated, sampled, disposed) and inspected as required:

- a. **Containerization**  
Immediately after an emergency, the emergency coordinator will make arrangements for the proper handling, treatment, and disposal of all recovered waste, contaminated soil, or other contaminated materials. Clean up operations will be conducted by placing all containment/ clean up materials, recovered spilled liquid wastes, and contaminated in DOT specification containers. Immediately, each container will be sealed, labeled, and placed in a safe location (i.e., warehouse) for removal for disposal.
- b. **Area and Equipment Decontamination, Sampling, and Analytical Testing**  
Prior to decontamination, sampling, and testing, or after if the Director approves of such, the Permittee will provide the Director with a plan that meets the general requirements of Table 4-1 (DSAT Plan) and gives:
  - Those areas of the facility to be decontaminated / sampled;
  - Equipment to be used to decontaminate / sample specific areas;
  - Organization (e.g. contractor(s)) to perform decontamination / sampling; and
  - Specific equipment / procedures to be used.

The Emergency coordinator will confirm, by submitting a DSAT Final Report to the director, that the clean up has been accomplished by the procedures in the submitted DSAT Plan

c. **Post Emergency Inspection of Area and Equipment**

After an emergency event, the exact location and evaluation / inspection results will be recorded in the operating records. Containers, floor coatings, walls, stripping and other items potentially affected by a fire or explosion will be inspected. All emergency equipment listed in Appendix E-1 ("Emergency Equipment List") will be inspected to determine if adequate quantities are clean, uncontaminated, in working order, and available. Clean ups are complete only when workers have cleaned themselves and the emergency equipment with soap and water. After clean up, the Director will be notified, and after approval of the clean up / inspection report, operations may resume (see section 4.2.3 "Reporting Requirements").

#### **4.4 Evacuation Plan**

Clearly marked exits exist in the warehouse and office area and employees are trained to be aware of all potential escape routes.

When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assemble across Beck Avenue to assure that all personnel are accounted for and out of the hazardous area. The signal for evacuation is either a verbal or loudspeaker announcement describing the hazard and the need for evacuation. The fire department must be notified at the time of evacuation either from a safe on-site building or from a neighboring facility. The evacuation plans are contained in Appendix F-4 ["Evacuation Plan (Floor Plan)"], for the escape route from inside the building, and Appendix F-3 ("Site Evacuation Plan") for the escape route outside the building. In case of a loss of power, the electrically operated gates may be manually opened by unlinking the motor drive located inside the fenced area. Additional guidance is contained in Table 4-5 "Evacuation guidance."

#### **4.5 Arrangement with Emergency Response Contractors**

An emergency response contractor may be used in the event of an incident. Use of a contractor will be determined by the Emergency Coordinator after evaluation of the incident. The contractor may provide emergency assistance during a release and/or cleanup.

#### **4.6 Pollution Incident History**

There are no records of a pollution incident having occurred at the facility.

#### **4.7 Implementation Schedule**

Any discrepancies or deficiencies found during the routine inspection must be corrected expeditiously to insure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The facility manager has the overall responsibility for remediating any

discrepancies found during a routine inspection, and will consult with the corporate environmental and engineering staffs to design an implementation schedule for remedial action.

#### **4.8 Availability and Revision of the Contingency Plan**

This plan and all revisions to the plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to local authorities and organizations listed in Appendix F-1 (“Emergency Contact List”) and they may be called upon to provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the facility. Material safety data sheets are maintained in the “OSHA Hazard Communication Program” notebook, which is in the branch office. In addition, a copy of the AHWMA Hazardous Waste Storage Permit containing this contingency plan is located in the branch manager’s office.

The plan is reviewed and immediately amended, if necessary, whenever:

- a. The facility license is modified to allow new process wastes to be stored or treated, or applicable regulations are revised;
- b. The list or location of emergency equipment changes
- c. The facility changes in its design, construction, operation maintenance, or other circumstances in a way that:
  - (i) Increases the potential for fires, explosions, or releases of hazardous constituents, or
  - (ii) Changes in the response necessary in an emergency.
- d. The names, addresses, or phone numbers of emergency coordinators change;
- e. The employee assigned to each emergency task changes; or
- f. The plan fails when implemented in an emergency.

**Table 4-1 (DSAT)**

**Decontamination, Sampling, And Analytical Testing Plan (DSAT)**

Decontamination – Decontaminate, if possible, all contaminated equipment, empty containers/ tanks, residues in such, protective clothing, structures, container liners, containment bases, containment system components (i.e., liners), and soil / asphalt / concrete. Use methods given in EPA-600/2-85/028 “Guide For Decontaminating Buildings, Structures, and Equipment At Superfund Sites” and perform subsequent sampling / analysis / decontamination until the area is “clean”. The area / item is “clean” when for liquid waste, levels are less than risk based levels, normal background levels, or are non-detect (note: The risk based levels can be applied to metals and concrete and are more than the TCLP toxic criterion of 40 CFR 261.) and for characteristic waste no longer meet the criterion of 40 CFR Part 261 “Characteristics Of Hazardous Waste.” If the area cannot be decontaminated, the area will be excavated / disposed as required in 40 CFR Parts 262, 263, and 268 if less than five feet below grade, or a proposed remediation plan submitted in accordance with Permit Part V “Corrective Action.”

Sampling – If a spill occurs and the waste is unknown, waste determinations must be done. The appropriate sampling method is dependant on the material to be sampled. Porous building materials (i.e., uncoated walls) which have the potential to become contaminated through the absorption of contaminants are also subject to clean up standards. Spray from extinguishers, venting of high vapor pressure internal waste, etc. all might contaminate materials not directly involved in a spill. Of the specific sampling method (i.e., surface wipe, rinsate, chip, scrape methods or subsurface boring, coring, drilling), the corresponding sampler and sampler procedure for use (from EPA SW-846 and EPA-600/2-80-018 “Samplers And Sampling Procedure For Hazardous Waste Streams”) will be used:

1. Liquids – for large amounts of liquid waste (i.e., liquids in sumps), the actual sampling must follow EPA SW-846 Chapter 9 “Sampling Plan” and Chapter 1 “Quality Control”, 40 CFR Part 261 Appendix I “Representative Sampling Methods”, and EPA 600/2-80-018 “Samplers And Sampling Procedure For Hazardous Waste Streams”. Small amounts of liquid waste may be adsorbed (i.e., by vermiculite), and then analyzed as a dry waste solid.
2. Solids – Dry Waste (i.e., dried spot on floor, discoloration, spill on dirt or road, fire fighting equipment runoff to soil, etc.) subsurface and surface sampling is performed on coated concrete pad, soil, asphalt, metal gratings, racks, pallets, etc. in accordance with the procedures in “1. Liquids” above, EPA 600/4-84-643 “Soil Sampling Quality Assurance User’s Guide”, EPA 600/4-83-020 “Preparation of Soil Sampling Protocol”, and EPA-600/2-85/028 (contains wipe sampling guidance), or another Director approved method.
3. Gases – Toxic and flammable vapors, and oxygen deficiencies will be measured, especially when personnel are in the proximity or are in a confined space (forced ventilation may be required). (N.B., All confined space entry will be performed in compliance with the current OSHA regulations, 29 CFR Part 1910.) The instrument(s) calibration requirements, procedure, and acceptable limits shall be specified and adhered to. OSHA permissible exposure limits (PEL) are limits for safe work without a respirator (29 CFR 1910.1000 Tables Z-1, Z-2, and Z-3. And 29 CFR §§ 1910.1001 through 1910.1052). Where no OSHA PEL exists, NIOSH recommendations and / or MSDS information will be used. In addition, NFPA-30-1990 defines flashpoint limits. Methods for sampling and analysis of airborne contaminants are contained in the “NIOSH Manual of Analytical Methods”.

Sample Analytical Testing – Testing and Analysis must be in accordance with EPA SW-846 “Test Methods For The Evaluation Of Solid Waste,” and 40 CFR Part 261 Subpart C “Characteristics Of Hazardous Waste” and 40 CFR Part 261 Appendix II “TCLP,” or other method approved by the Director for all hazardous waste constituents of concern.

**Table 4-2 (HEAP)**  
**Hazard And Exposure Assessment Plan (HEAP)**  
**(ASTM-F1011-1986 and EPA/600/2-85/028)**

Hazardous Substance Physical Identification:

- 1.1 Identify source of spill (e.g., tanker truck, rail car, storage facility).
- 1.2 Accurately identify substance spilled and its hazards:
  - 1.2.1 Substance identification (from DOT Placards, UN identification numbers, Standard Transportation Commodity Code (STCC) number, and markings or material labels and shipping papers).
  - 1.2.2 Hazard(s) identification (from DOT labels / placards, NFPA labels, physical observations, and detector measurements).
- 1.3 Physical characteristics (solid, liquid, gas)
- 1.4 Approximate volume of spill, the total volume at the source, or both
- 1.5 For all types of accidents, determine the manufacturer or generator and if applicable, the shipper's name.
- 1.6 Identify the person reporting the spill and determine the time of the spill report.
- 1.7 Determine the approximate time of the spill (maintain chronological record of events).
- 1.8 Estimate the material release rate.

Identify The Number and Location of Injured Personnel:

- 2.1 Notify medical authorities.
- 2.2 Conduct a rescue assessment (Safety implications; equipment required).

Collect Site Information:

- 3.1 Current weather conditions:
  - 3.1.1 Rain (snow) or prospects of rain (snow).
  - 3.1.2 Wind speed and direction (determination of the size of evacuation areas will be made based on chemical hazard and weather data. The weather service will be consulted to ascertain wind direction, wind speed, and any other relevant weather information.)
  - 3.1.3 Air temperature, weather stability, and forecast (immediate and long-term).
- 3.2 Terrain characteristics (e.g., topography, ground porosity, surface or ground water)
- 3.3 Demographics (e.g., distance to public areas such as schools, churches, public buildings, busy intersections, shopping centers, recreational facilities, hospitals, convalescent centers, drinking water supplies, to food and feed processing facilities, and to sewers).

Determine Plan of Action

- 4.1 Identify probable waste source and types from labels or site history. Information available on the condition of waste containers should be noted.
- 4.2 Identify the pathways of the contaminant migration for each waste source (surface water, ground water, air transport, ditches, etc.).
- 4.3 Identify receptors of the contamination (nearby residences, wells, wetlands, endangered species).
- 4.4 Identify possible hazards from hazardous materials and hazardous waste identification and site information.
  - 4.4.1 Threat evaluation (e.g., a qualitative evaluation of conditions such as the likelihood of migration, amount of contaminant migration, and time frame of exposure).
  - 4.4.2 Examples of hazards to be assessed include reaction of spilled incompatible wastes, reaction of water reactive wastes with water from fire fighting equipment, and off site migration of toxic fumes in the direction of prevailing winds.
  - 4.4.3 Some sources of chemical hazard data (other than MSDS) are Bretheric "Handbook of Reactive Chemical Hazards" and Sax "Dangerous Properties Of Industrial Materials."
- 4.5 Evaluate required response resources based on information collected, identify logistics problems, estimate impact area, and any remedial action required.

**Table 4-3**  
**Guidance On Mitigation, Confinement, And Containment Methods**  
**(NFPA-471-1989 and ASTM-F1127-1988)**

Physical And Chemical Methods

The responder must take into account conditions such as heat, cold, rain, or wind which can have a significant effect on the methods chosen to be used: (1) “physical methods” include absorption, covering, dikes, diversions, retention, dilution, over-pack, plug, patch, transfer, vapor suppression (blanket) or dispersion, and venting; and (2) “chemical methods” include adsorption, controlled burning, dispersion, emulsification, flare, gelation, neutralization, polymerization, solidification, and vent and burn.

- Patch And Plug – Wood plug, metal sheet, inflatable plugs and bags, fabric patch, formed plug, caulking patch, self-expanding foam plug, magnetic patch, mechanical patch, adhesive patch, bladder wrap, split clamp pipe patch, pipe pinch.
- Immobilize – Methods to prevent spreading of spills include:
- Liquid Property – Physical property (viscosity, vapor pressure) by temperature change, immobilization (absorbent, gellant), pump, physical barriers, dikes (sandbags, water inflatable, bags, weighted adsorbent foam plastic, absorbent sand mixture), boom curtains, portable dams, block sewers and drains in path be absorbent sand mixture, and use weighted absorbent on bottom of stream for high specific gravity spills.
- Land Spills – Pumping, absorbents, gellants, dikes, dams, trenches, soil and dike sealants and physical modification (freezing).
- Solid Spills – In absence of bad weather, fire, explosion, or contact with other incompatibles and reactive materials, solids should be easily contained. When solids are solubilized by contact with rain or water used in fighting a fire, techniques used to contain liquid spills should be used. Also, when accompanied by a fire or water or other reactive, particulate clouds, toxic vapors, and even explosions may occur
- Volatile Spills, Gases – Foam or film covering, water spray, chilling, scrubbing, neutralization.
- Enclose – Enclose the containers with approved salvage drums and containers including over-packs, recovery drums, waste drums, and “open-head” drums.

Action Checklist for Leaking, Deteriorated, or Bulged Drums or Tanks:

- Stop area processes and operations.
- Determine major waste components at the time of the spill.
- Monitor for leaks, gas generation, and pressure build-up in stored drums and tanks.
- Monitor other equipment not directly involved in the emergency for leaks, pressure build-up, gas generation, or ruptures which could encourage the spread of fire and / or explosions.
- If someone is able to enter the effected area, drums and tanks should be visually inspected for signs of leaks, corrosion, bulges, or dents.
- Remove all surrounding materials that could be especially reactive with the waste.
- Remove all possible sources of ignition. This is particularly important in instances where spills or discharges of flammable or ignitable materials have occurred, but a fire has not yet started.
- Recover or isolate containers, and collect and contain released waste.
- If the waste is ignitable or flammable, the equipment used in the transfer, containment, clean up, or other operation, including pumps, will be of spark-proof and explosion-proof construction.
- If pumping materials whose vapor is flammable, employ a grounded system so that static electricity build-up cannot occur at discharge ports or nozzles.
- If a pump is used, before operating the pump, check the hose connections for tightness, and fuel lines for leaks.
- If drum movement will cause rupture, the contents of drums that exhibit leakage or apparent deterioration will be immediately transferred to a recovery drum, if necessary and safe.
- If drums cannot be moved without rupture (such as leaking drums containing sludges or semi-

solids, drums that are structurally sound but which are open and contain liquid or solid waste, and drums which are deteriorated), the drums will be immediately placed in recovery drums.

- If the drums are or could be under internal pressure (as evidenced by bulging), sample the drums in place. Note: Extreme care should be exercised when working with or near potentially pressurized drums.
- If pressurized drums must be moved, either: (1) handle with a grappler unit constructed for explosive containment, and move only as far as necessary to allow for seating on firm ground; or (2) carefully over-pack.
- If the open drums contain material with high vapor pressure, the pressurized drum openings will be plugged and bung holes fitted with vent caps set at 5 psi release.
- If the drum has fallen over and is leaking, try to stop the leak by uprighting the container if possible.

**Table 4-4**  
**Personal Protective Equipment**  
**(NFPA-471-1989 and EPA/600/2-85/028)**

Personal protective equipment (respiratory, chemical, thermal) is divided into four categories based on the degree of protection afforded. An asterisk (\*) after the description indicates optional, as applicable.

Level A protection should be used when:

- The hazardous material has been identified and requires the highest level of protection for skin, eyes, and the respiratory system based on either measured (or potential for) high concentration of atmospheric vapors, gases, or particulates; or the site operations and work functions involve a high potential for splash, immersion, or exposure to unexpected vapors, gases, or particulate of material that are harmful to skin or capable of being absorbed through intact skin;
- Substances with a high degree of hazard to the skin are known or suspected to be present, and skin contact is possible; or
- Operations must be conducted in confined, poorly ventilated areas, and the absence of conditions requiring Level A has not been determined.

Level A equipment includes (to be used as appropriate):

- Positive pressure, full face-piece, self-contained breathing apparatus (SCBA), or positive pressure supplied air with escape SCBA, approved by NIOSH.
- Totally encapsulating chemical protective suit. Totally encapsulating chemical protective suit (TECP) means a full body garment that is constructed of protective clothing materials; covers the wearer's torso, head, arms, legs; has boots and gloves that may be an integral part of the suit, or separate and tightly attached; and completely encloses the wearer by itself or in combination with the wearers respiratory equipment, gloves, and boots. All components of a TECP suit, such as relief valves, seams, and closure assemblies, should provide equivalent chemical resistance protection.
- Long underwear and coveralls\*.
- Gloves, outer and inner, chemical resistant.
- Boots, chemical resistant, steel toe and shank.
- Hard-hat (under suit)\*.
- Disposable protective suit, gloves, and boots (depending on suit construction, may be worn over totally encapsulation suit)\*.
- Two-radio (worn inside encapsulating suit).

Level B protection should be used when:

- The type and atmospheric concentration of substances have been identified and require a high level of respiratory protection, but less skin protection; Note: This involves atmospheres with immediately dangerous to life and health (IDLH) concentrations of specific substances that do not represent a severe skin hazard, or that do not meet the criteria for air purifying respirators.
- The atmosphere contains less than 19.5 percent oxygen; or
- The presence of incompletely identified vapors or gases is indicated by a direct reading organic vapor detection instrument, but the vapors and gases are known not to contain high levels of chemicals harmful to skin or capable of being absorbed through intact skin.
- The presence of liquids or particulate is indicated but they are known not to contain high levels of chemicals harmful to skin or capable of being absorbed through intact skin.

Level B equipment includes:

- Positive pressure, full face-piece, self-contained breathing apparatus (SCBA), or positive pressure

supplied air with escape SCBA, approved by NIOSH.

- Hooded chemical resistant clothing (overalls and long-sleeved jacket, coveralls, one or two piece chemical splash suit, disposable chemical resistant coveralls).
- Coveralls and face shield\*.
- Gloves, outer and inner, chemical resistant.
- Boots, outer, chemical resistant, steel toe and shank.
- Boot covers, outer, chemical resistant (disposable)\*.
- Hard hat\*.
- Two-radio (worn inside encapsulating suit).

Level C protection should be used when:

- The atmospheric contaminants, liquid splashes or other direct contact will not adversely effect or be absorbed through any exposed skin;
- The types of air contaminants have been identified, concentrations measured, and an air purifying respirator is available that can remove the contaminants; and
- All criteria for the use of air purifying respirators are met.
- Atmospheric concentration of chemicals must not exceed IDLH levels. The atmosphere must contain at least 19.5 percent oxygen.

Level C equipment includes:

- Full face or half mask air purifying respirator (NIOSH approved).
- Hooded chemical resistant clothing (overalls and long-sleeved jacket, coveralls, one or two piece chemical splash suit, disposable chemical resistant coveralls).
- Gloves, outer and inner, chemical resistant.
- Boots, outer, chemical resistant, steel toe and shank.
- Boot covers, outer, chemical resistant (disposable)\*.
- Hard hat\*.
- Escape mask, face shield, and coveralls\*.
- Two-radio (worn inside encapsulating suit).

Level D protection should be used when:

- Work functions preclude splashes, immersion, or the potential for unexpected inhalation of or contact with hazardous levels of any chemicals. Note: Combinations of personal protective equipment other than those described for Levels A, B, C, and D protection may be more appropriate and may be used;
- The atmosphere contains no known hazard.

Level D equipment includes:

- Boots or shoes, outer, chemical resistant, steel toe and shank.
- Boot covers, outer, chemical resistant (disposable)\*.
- Safety glasses or chemical splash goggles, and hard-hat.
- Escape mask, face shield, and gloves\*.

**Table 4-5**  
**Evacuation Plan Guidance**

In the event an evacuation from the hazardous waste storage facility is necessary, the following actions will be taken:

1. The signal for evacuation of the hazardous waste storage building will be activated – by fire alarm, intercom, and / or voice.
  - The building will be evacuated according to the evacuation map and all personnel will assemble at an assigned location not downwind from the hazard area
  - Supervisors will stay with their personnel and account for the people under their supervision. Immediate supervisors will be held responsible for those people reporting to them. Visitors will be the responsibility of the employees they are visiting. Contractors are the responsibility of the person administering the individual contract. Truck drivers are the responsibility of the area supervisor where the truck is loading / unloading.
  - Supervisors will designate certain exits as the safest exits for his or her employees, and will also choose an alternate exit if the first choice is inaccessible. During exit, the supervisor should try to keep his or her group together.
  - An area of isolation will be established. The size will generally depend on the size of the spill and the chemical involved. If possible the area will be roped or otherwise blocked off.
  - Make sure all unnecessary people are removed from the hazard area.
2. The emergency coordinator will make an immediate assessment (section 4.2.1 “hazard assessment”) of the situation. If the emergency coordinator determines that the facility is unable to handle the emergency, then local, state, and Federal authorities will be notified of the need to evacuate the on site area. Evacuation of all potentially effected areas will be initiated as soon as possible.
  - No entry of visitors, contractors, or trucks (except response personnel and equipment) will be permitted. All non-essential traffic within the area will be restricted for safe exit of personnel and movement of emergency equipment.
  - No person will remain or re-enter the effected area unless specifically authorized (i.e. overseeing or performing emergency operations).
3. If the emergency coordinator deems it necessary to start evacuation from off site areas, he will advise local enforcement agencies (police, sheriff, or Department of Public Safety). The local agencies will inform residents within an appropriate distance if evacuation is necessary and when the area is deemed safe to return.
  - Off site vehicular traffic in the area will be halted.
  - If a highly flammable material is released (i.e., propane or an equivalently hazardous gas):
    - All persons up to one half mile radius will be notified.
    - All ignition sources will be eliminated. Vehicle use will be restricted or eliminated to avoid vapor ignition when flashback to the source and an explosion are highly possible.
    - The entire area within 2000 feet radius will be evacuated.
    - If a fire is involved and is concentrated at the source, people will be evacuated up to one half mile (2,640 feet) downwind.
    - If the spill results in the formation of a toxic vapor cloud (by reaction with surrounding material or by the outbreak of fire) and this cloud is released from the storage building, further evacuation will be enforced. An area of sufficient size to preclude hazardous exposures will be evacuated downwind if volatile materials are spilled.
4. Re-entry to the effected area will be made only after clearance is given by the emergency coordinator.