

ATTACHMENT II-5
PREPAREDNESS AND PREVENTION PLAN

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PREPAREDNESS AND PREVENTION

1.0 Introduction

Design, construction, maintenance and operational standards are discussed within their respective areas of the facility's permit. The design of existing and proposed facilities follow preparation, review and approval using sound engineering practices in order to minimize potential problems. All structures and units subject to soils criteria shall be designed utilizing the best existing technologies. Construction requirements and specifications have been prepared, or are prepared relative to any future construction. Maintenance criteria for inspecting, repair or replacement are primarily identified within the General Inspection conditions of the permit. Operational requirements have been and will continue to be based on experience and good operational practices.

During design, construction and operation of the existing operations, and any planned or proposed operations, Clean Harbors Grassy Mountain, LLC (hereafter referred to as GMF) shall minimize the possibility of fire, explosion, or any sudden or non-sudden accidental release of hazardous waste or hazardous substances to the environment.

2.0 Communications

In accordance with R315-8.3.3 (a), emergency information shall be provided to site personnel using one or all of the site communications systems, Public Address System, two-way radios, etc.

The Emergency Coordinator shall choose the appropriate communication system to utilize at the time of the emergency. This information shall be relayed to other responders either face to face, over the PA system, or through use of the two-way radios.

In addition, site personnel can be alerted by the activation of a facility siren. A continuous siren warns site personnel that a dangerous situation exists and to wait for further instructions. The siren is tested according to the requirements of the Site Inspection Plan. Site personnel and visitors shall be notified prior to siren tests.

GMF primarily uses the telephone system at the facility to contact personnel outside the facility. In the event of a failure of the telephone systems during an emergency situation, site personnel can ask for assistance using two-way radios, CB radio. Additionally, there are cellular telephone(s) for outside contacts. Arrival of outside emergency response entities and the availability of their communication system(s) would provide additional contact capability.

3.0 Fire Response Equipment

To provide rapid response to small fires, portable fire extinguishers shall be located at all process units and selected facility vehicles. The fire extinguishers range in size from 2.5 to 10 pounds and are rated for a variety of fire types. For the purpose of fire suppression of larger fires, there are four fire systems that provide water to various portions of the facility. This water for the systems is transported from off-site locations and supplies the systems with an adequate delivery volume.

The system shall be equipped with a centrifugal pump driven by a fifty (50) horsepower electrical motor and is capable of delivering water at the rate of five hundred gallons per minute (500 gpm) at one hundred pounds per square inch (100 psig).

There are three firefighting water systems at the facility. The first system serves the Administration/Laboratory Building, and consists of two insulated above-ground tanks each with 22,000 gallon capacity. Water is delivered by a 1500 gallon per minute (gpm) pump. This system supplies water to the automatic sprinkler system in the building and to the three fire hydrants that are located around the perimeter of the building.

The second system delivers water to fire hydrants located throughout the operations area. The storage system consists of two underground storage tanks. Tank 1 has the capacity of 8,800 gallons, while Tank 2 has the capacity of 4,500 gallons. Water is delivered to the fire hydrants by a high capacity pump.

A six inch (6") emergency water line connects the firewater pump and fire hydrants. The fire water pump discharge system has several hose stations with approximately one hundred and fifty feet (150') of hose at each station. The facility shall maintain this, or an equivalent, delivery station for the purpose of firefighting. Figures 4-1 and 4-2 in the Contingency Plan (Attachment II-6) illustrate the location of the hydrants at the facility.

The third firefighting system is dedicated to the automatic sprinkler system for the Drum Dock and consists of a 22,000 gallon insulated tank and a 250 gpm pump.

4.0 Additional Equipment

The Contingency Plan shall contain a list of available local contractors who can supply equipment.

5.0 Spill Prevention

In consideration of control of spills, spill control equipment shall be maintained on site, storage

and process tanks shall be equipped with overflow sensors, and storage units contain liquid collection sumps and shall be diked to provide secondary containment. Additional spill prevention information is available in the Spill Prevention Control and Countermeasure (SPCC) Plan, which is Attachment X-4 of the Permit.

6.0 Testing and Maintenance of Equipment

Testing and maintenance schedules shall be followed for all facility communication systems, the alarm system and fire protection equipment. Inspections are used to evaluate performance and verify operability of emergency equipment. The Inspection Program schedule, contained in the site inspection plan, outlines the elements of inspections and their frequency.

7.0 Preventive Procedures

No employee shall be allowed to work alone in a hazardous waste management unit unless notification is given to the compliance guard (receiving staff) prior to commencing that activity. The compliance guard, depending upon the activity and is working, will check the status of the employee at regular intervals, but at least once per hour. On weekend shifts or other shifts that are staffed by two or less employees (including the receiving staff), a lone employee shall not move containers of waste, or in other ways engage in activity that could jeopardize his/her safety.

Employees working in hazardous waste management areas shall not work without access to internal alarm or communications systems, either through direct access or through contact with a nearby employee. Operations at a particular unit typically involve more than one employee and some units are located within close proximity of each other.

Personnel involved with other activities performed on-site, which are non-hazardous in nature, are often provided portable communications equipment or have access to fixed devices.

8.0 Aisle Space Requirements

All areas of the facility are accessible by emergency equipment. Aisle space in the container storage buildings are maintained at a minimum of 2.5 feet.

9.0 Outside Agencies

The Contingency Plan details that the local authorities have been familiarized with the various attributes of the site. The fire departments have been informed of the location of various pieces

of firefighting equipment. Figures identifying the locations of various operations have been provided.

The Utah State Highway Patrol is aware of the facility location and the location for a roadblock on the facility access road, should one be necessary.

Local hospitals, ambulance services (ground and air) have also been informed of the likely kinds of injuries that could be expected at the site. Their agreements are also documented in the Contingency Plan.