

ATTACHMENT II-5

PREPAREDNESS AND PREVENTION PLAN

DRAFT

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PREPAREDNESS AND PREVENTION

1.0 INTRODUCTION

~~Design, construction, maintenance, and operational standards are discussed within their respective areas of the Clean Harbors Grassy Mountain (CHGM) facility's permit. The design of existing and proposed facilities follows preparation, review and approval using sound engineering practices 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, repairing, 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.~~

Clean Harbors Grassy Mountain (CHGM) shall minimize the possibility of fire, explosion, or any sudden or non-sudden accidental release of hazardous waste or hazardous substances to the environment ~~during design, construction, and operation, and closure of the facility of the existing operations, and any planned or proposed operations.~~ Clean Harbors Grassy Mountain, LLC (hereafter referred to as CHGMGMF) 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 UAC R315-8-264-34.3.3 (a), emergency information shall be provided to site personnel using one or all 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 (Attachment II-3). Site personnel and visitors shall be notified prior to siren tests.

CHGMGMF primarily uses the telephone system at the facility to contact personnel outside the facility. In the event of a failure of the telephone system during an emergency, 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 installed on or inside 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~~ To suppress larger fires, there are ~~three~~ four fire systems that provide water to various portions of the facility. These systems are inspected and tested annually. ~~This w~~Water for

the fire systems is transported from off-site ~~locations~~ and placed in water supply tanks to supplies provide 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~~ can deliver 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 1,500 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 (Attachment II-6 Table 4-6) ~~shall~~ contains a list of available local contractors who can supply equipment.

5.0 SPILL PREVENTION

~~In consideration of control of spills~~ To prevent and control spills, CHGM shall maintain 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~~ that are diked to provide secondary containment. Additional spill prevention information is available in the CHGM Facility's 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 CHGM ~~i~~ Inspection Program schedule, contained in the S ~~i~~ Site ~~I~~ nspection ~~P~~ lan (Attachment II-3), 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-fewer~~ employees ~~(including the receiving staff)~~, a lone employee shall not move containers of waste, or ~~in other ways~~ engage in any other activity that could jeopardize ~~his/her/their~~ 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 proximity.

Personnel performing non-hazardous ~~involved with other~~ activities ~~performed on-site shall be,~~ ~~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 ~~CHGM the facility are~~ must be accessible by emergency equipment. CHGM shall maintain a minimum a Aisle space of 2.5 feet in the container storage buildings. ~~is maintained at a minimum of 2.5 feet.~~

9.0 OUTSIDE AGENCIES

The Contingency Plan (Attachment II-6) and Quick Reference Guide (QRG) ~~details that describe how~~ the local authorities have been familiarized with the ~~various~~ attributes of the site. CHGM has informed ~~The fire departments have been informed~~ of the location of ~~various pieces of~~ firefighting equipment and provided them with diagrams. ~~Figures that~~ identifying the locations of ~~various~~ operations ~~have been provided~~.

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

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