

ATTACHMENT 5
PREPAREDNESS AND PREVENTION PLAN

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1.0 PROCEDURES, STRUCTURES, OR EQUIPMENT

1.1 Unloading Operations

Forklifts and/or drum carts are used to load and unload containers to and from trucks. Material handlers have appropriate training in handling forklift trucks and moving and storing containers.

Waste containers are always kept closed when in storage. Customer wastes are never opened.

Each drum is loaded/unloaded by a forklift unit and any drum to be stored is placed on a pallet. Each pallet is transported from the loading area by forklift unit to the waste container storage unit (CSU). The same procedure is repeated when the containers must be removed from the CSU to be loaded for shipment.

1.2 Run-off

The CSU is curbed to prevent run-off to other areas. The storage area is covered with a canopy roof to minimize precipitation from collecting in the CSU.

1.3 Water Supplies

The CSU for containerized waste is equipped with an impervious concrete floor which is also curbed for secondary containment. The CSU is equipped with secondary containment. No spillage within this area could be discharged into the ground. There are no known water wells within one quarter mile of the facility.

1.4 Equipment and Power Failure

Operations in the CSU would not be affected by a power outage since material handling is by mechanical means. The principal potential failure would be physical failure of containers.

A damaged container would be immediately placed in a recovery drum. If the container is larger than a drum, the contents will be transferred to another container in good condition. In the event of a leaking container, the plant spill control plan would be implemented. The plant spill control plan is described in the Contingency Plan, located in Attachment 4.

A spill would be immediately contained. Spilled material would be absorbed or neutralized and the absorbed spill would then be appropriately cleaned up.

1.5 Personnel Protective Equipment

The facility provides protective clothing and equipment that are needed for the work place depending on the processes taking place.

1.6 Prevent Releases to the Atmosphere

Hazardous wastes are stored in closed containers in the CSU. Containers are inspected to see that they are closed. Containers holding ignitable or high vapor pressure wastes are protected from radiant heat by storage under canopy.

2.0 PRECAUTIONS TO PREVENT ACCIDENTAL IGNITION OR REACTION OF IGNITABLE OR REACTIVE WASTE

To minimize the possibility of ignition of ignitable or reactive wastes, hazardous waste truck drivers are properly trained to reject leaky, suspicious, deteriorated, or otherwise unacceptable containers of waste offered by generators. Wastes are only acceptable if placed in compatible containers meeting DOT requirements. Moreover, while containers are being stored, they remain closed and sealed. Waste containers are stored on pallets.

The waste CSU is inspected weekly so that any leaks or spills can be detected and cleaned up immediately, thus reducing the possibility of adverse reactions. Any leaking container is transferred to an over-pack recovery container. If ignitable waste requires a transfer, spark proof equipment will be utilized.

The waste containers are stored in an area which is protected from accidental ignition sources. Smoking is not permitted in this area, and "NO SMOKING" signs are conspicuously posted. The waste CSU is more than 15 meters (50 feet) from the facility property line.

Containers of waste are moved in/out of the storage area by forklift units.

Open flames, cutting and welding, hot surfaces, frictional heat, sparks, and radiant heat are prohibited in the canopy area which contains flammable materials. Stored containers of ignitable waste are not opened nor are contents transferred except to mitigate a spill or leak. In this situation, grounding cables will be utilized to prevent possible ignition from a static discharge. Containers holding ignitable or high vapor pressure wastes will be protected from radiant heat to avoid bulging by storing under the canopy. Incompatible wastes are not placed in the same container. Unwashed containers are not used in the storage process.

3.0 PREPAREDNESS AND PREVENTION

3.1 Applicability

In accordance with UAC R315-270-14, the Clearfield facility does not waive any of the preparedness and prevention requirements of UAC R315-264-30 through 37.

3.2 Design and Operation of the Facility

The Facility will be designed, constructed, maintained, and operated to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden discharge of hazardous waste or hazardous waste constituents which could threaten the environment or human health.

3.3 Required Equipment

- (a) The facility is equipped with telephones which can be used to provide immediate emergency instructions to facility employees.
- (b) The facility is equipped with telephones which are available to summon external emergency assistance from emergency response agencies.
- (c) The facility is equipped with portable fire extinguishers throughout the facility.
- (d) Water at adequate volume and pressure is available from nearby fire hydrants to supply water hose streams at the facility. The CSU is equipped with a sprinkler system.

3.4 Testing and Maintenance of Equipment

The facility communications systems, fire protection equipment, safety equipment, discharge control equipment, and decontamination equipment, where required, will be tested and maintained to assure its proper operation in time of emergency.

3.5 Access to Communications or Alarm System

Whenever hazardous waste is being handled, all employees involved in the operation will have immediate access to a telephone or an air horn, either directly or through visual or voice contact with another employee. Hazardous waste will not be handled with only one employee on the premises.

3.6 Required Aisle Space

Aisle space will be maintained at 30 inches to allow the unobstructed movement of personnel and equipment for emergency purposes.

3.7 Arrangements with Local Authorities

Arrangements have been made with local authorities for emergency response. Details are included in the Contingency Plan in Attachment 4.