ATTACHMENT II-6-B CONTINGENCY PLAN

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CONTINGENCY PLAN

1.0 GENERAL FACILITY DESCRIPTION

The Clean Harbors Grassy Mountain facility (CHGM) is an existing treatment, storage, and disposal facility for industrial and hazardous wastes. CHGM has a laboratory, container storage units, chemical treatment units, storage tanks, a surface impoundment, landfill cells that contain both RCRA and TSCA wastes, elemental mercury consolidation and storage, PCB storage (container and tank), transformer drain and flush facilities, and support facilities such as locker rooms, communications systems, lunchrooms, and office facilities. A wide range of waste types are accepted for treatment, storage, and disposal.

1.1. PURPOSE OF THE CONTINGENCY PLAN

The Contingency Plan outlines the procedures to protect human health and the environment in the event of personal injury accident, a release of hazardous materials, fire, or explosion. The emergency response procedures outlined in this plan are intended to meet the mandates of the regulatory agencies having jurisdiction over the facility including:

- The State of Utah Department of Environmental Quality, Division of Waste Management and Radiation Control, through the administration of the RCRA hazardous waste regulatory program (R315 of the Utah Administrative Code (UAC)).
- The United States Environmental Protection Agency through the administration of the PCB regulatory program (Title 40, Code of Federal Regulation (C.F.R.) Part 761) and the Hazardous and Solid Waste Amendments of 1984.
- The U.S. Department of Labor, Occupational Safety and Health Administration (i.e., 29 C.F.R. Part 1910).
- Tooele County through implementation of the Conditional Use Permit for CHGM.
- The U.S. Department of the Interior, Bureau of Land Management through implementation of an agreement allowing access to CHGM over public lands.

1.2. IDENTIFICATION, LOCATION AND SITE PLAN

- Name: Clean Harbors Grassy Mountain, LLC
- Location: Eastern edge of the Great Salt Lake Desert in Tooele County, Utah, 3miles East and 7 miles North of Knolls, Exit 41 off Interstate 80. Latitude 40° 49' 00" N; Longitude 113° 12' 30" W, Township 1 North; Range 12 West; Section 16, plus a 0.5-mile perimeter buffer around the section
- Facility Telephone: (435) 884-8900
- Site Plan: Figure 1-1 is the location map for the facility. Figure 1-2 is a plan view of the waste handling and processing areas of the facility with evacuation routes.

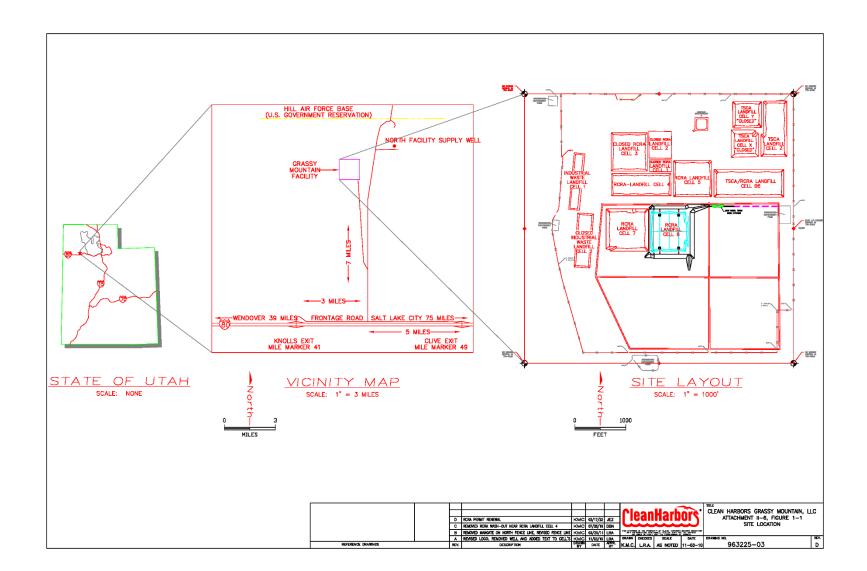


Figure 1-1. Site Location

Attachment II-6-B: Contingency Plan Clean Harbors Grassy Mountain, LLC

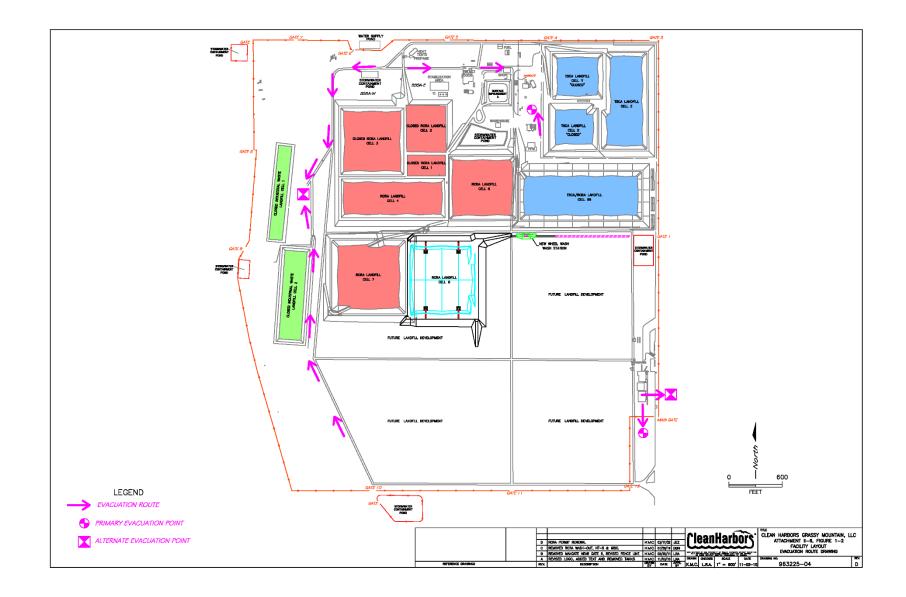


Figure 1-2. Facility Layout and Evacuation Route

1.3. FACILITY OPERATIONS

CHGM manages PCB waste, industrial waste, and hazardous waste utilizing the following processes and/or units:

- Container Management Facility/Drum Dock (container handling and storage)
- Stabilization Area stabilization and/or treatment in tanks.
- Landfill units.
- Surface impoundment A.
- Drain and Flush Building Warehouse One (DFBWO) PCBs and elemental mercury.
- Leachate storage.
- Debris Treatment.
- Analytical laboratory.

1.4. WASTE TYPES MANAGED AT THE FACILITY

CHGM accepts, processes, and disposes of a wide variety of waste materials. Waste streams are managed in containers (e.g., drums, small tanks, pails, cartons, bags, etc.) and in bulk form (e.g., end dumps, roll-offs, gondolas, roll-off trailers, and road tanker trucks).

Waste types typically handled at the facility and their potential hazards are identified below:

- Liquid acids and bases, which may cause burns if brought into contact with the skin or react chemically if not managed properly.
- Waste paint and degreasing solvents, which may be ignitable or cause illness if inhaled or ingested.
- Polychlorinated biphenyls, which may cause illness if ingested.
- Heavy metals, which may cause illness if inhaled or ingested.
- Cyanides and sulfide wastes, which may release toxic gases if improperly managed.
- Discarded chemical products, which have a wide range of characteristics.
- Asbestos, which may cause illness if inhaled.
- Oily wastes, which may burn.
- Soils and other solid materials contaminated with any of the above materials.

1.5. Types of Potential Emergencies

The potential for an emergency exists at CHGM due to the activities performed and the types of materials handled. Additionally, other events (e.g., earthquakes, wildfire) could create an emergency at the facility that must be appropriately and effectively managed. These types of events are addressed below as situations that could cause the Emergency Coordinator to implement the Contingency Plan.

1.5.1. Hazards Inherent to Facility Operation

1.5.1.1. Fire

- Could cause the release of toxic fumes.
- Could spread and possibly ignite materials at other locations on-site or could cause heat induced explosions.
- Could produce contaminated runoff from fighting fires with extinguishing chemicals or water.
- Could injure personnel.
- Could cause damage to the physical structures of the facility.
- Could cause damage to the liner of landfill cells.

1.5.1.2. Explosion

- Could cause a safety hazard from flying fragments or shock waves.
- Could ignite other waste at the facility.
- Could damage other containers or tanks at the facility which would result in the release of toxic material.
- Could cause injury to personnel.
- Could damage physical structures.
- 1.5.1.3. Spill or Material Release
 - Could result in the release of flammable liquids or vapors capable of causing a fire or gas explosion.
 - Could cause the release of toxic liquids or vapors.
 - Could result in contamination of surface or groundwater, and/or soil.
 - Could cause injury to personnel.
 - Could damage physical structures.
 - Could cause fire, explosion, or spill.
 - Could cause the mixing of incompatible chemicals.
 - Could cause release of toxic materials to surface water, soil, or air.
 - Could cause injury to personnel.

1.5.2. Natural Events

CHGM emergencies can arise from natural events, such as earthquakes or thunderstorms, to which the Emergency Coordinator will respond as indicated in this Contingency Plan. CHGM maintains emergency response equipment as well as personnel trained in its use, who are expected to respond to these events.

1.6. DELEGATION AND ASSIGNMENT

Table 2-1 identifies three individuals who are trained to coordinate CHGM's response to an emergency event.

CHGM typically operates on a five day per week, day shift only basis. One of the Emergency Coordinators listed in Table 2-1 is always on call. If the on-call Emergency Coordinator is not at the facility, then they are available to those individuals present at the facility through a paging device, cellular phone, or other means.

Depending on the nature of the event, the on-call Emergency Coordinator may delegate certain duties to those present at the facility by telephone.

1.7. AUTHORITY

The Emergency Coordinator (primary or alternate) has been granted authority to carry out the procedures outlined in this Contingency Plan in the event of an emergency. Authorities include:

- Deploying equipment
- Directing company personnel
- Contacting regulatory agencies
- Contracting for commercial vendors
- Summoning assistance from hospitals, fire departments, etc.
- Shutting down operations and evacuating the facility

2.0 IMPLEMENTATION OF RESPONSE PROCEDURES

Appropriate and prudent response activities shall be initiated in the event of any incident that results in fire, explosion, or accidental release of toxic materials. The Emergency Coordinator or their designee shall perform an assessment of the situation immediately. Criteria considered in this assessment are shown in Figure 2-1. The Environmental Coordinator decides whether to implement the Contingency Plan in whole or in part and documents the decision in the Operating Record.

2.1. INCIDENT ASSESSMENT AND DECISION PROCESS

CHGM's response to an incident shall be tailored to the requirements of the event. While the Contingency Plan presents a broad range of capabilities and procedures, only those activities appropriate to a particular situation are employed. For example, the facility will only be evacuated if the personnel are in direct physical danger. A logic diagram of the initial response activities leading to implementation of the Contingency Plan is shown in Figure 2-1. Should the release be minor or controllable and present no immediate hazard to human health or the environment, the Emergency Coordinator will only implement the post-emergency procedures described in Section 7.0 and complete any necessary reporting described in Section 9.0.

A person who observes an incident that they believe could threaten human health or the environment shall implement the following procedures:

- 1. Activate the incident warning system (telephone, two-way radio or emergency alarm) to notify facility personnel.
- 2. Contact the Emergency coordinator and report their name and the location, nature, and extent of the incident.
- 3. Begin containing and collecting the released material using control measures such as diking with soil or other available sorbent materials or collecting the material in a suitable container.

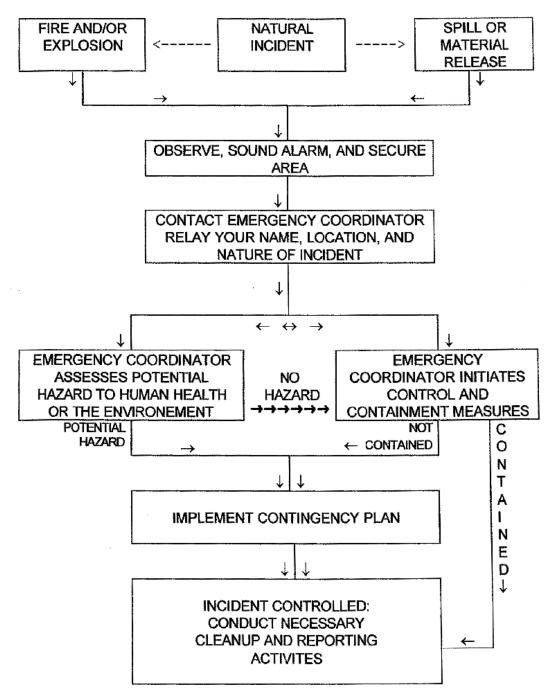
The Emergency Coordinator will take control of the affected area and any resources necessary until the emergency has been eliminated and necessary cleanup or restoration is completed.

The Emergency Coordinator will direct the following activities during the evaluation process:

- 1. Where applicable, see that the process and/or operations are stopped and that any released waste is contained and collected to ensure that fires or explosions do not occur or spread.
- 2. Determine the source and extent of the released materials and assess the primary and secondary hazards. Figure 2-1 presents the evaluation criteria the Emergency Coordinator will use to determine if the Contingency Plan is to be implemented.
- 3. The Contingency Plan shall be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

Figure 2-1: Contingency Plan Implementation Logic Diagram

Figure 2-1



CONTINGENCY PLAN IMPLEMENTATION LOGIC DIAGRAM

All emergencies must be reported to the Emergency Coordinator or Alternate.

Table 2-1. Emergency Coordinators.

| Position | Name | Telephone Numbers |
|-----------|---------------|---|
| Primary | Shane Whitney | 801-969-7805 (Home) 435-884-8976 (Office) 801-557-2946 (Cell) |
| Alternate | Blaine Boyer | 435-249-0779 (Home) 435-884-8947 (Office) 801-556-0198 (Cell) |
| Alternate | Ravi Bhide | 435-884-8972 (Office) 385-377-8663 (Cell) |

The following organizations may be notified of an emergency condition if appropriate. Those in bold are provided with a copy of this plan.

| Emergency Services | Business Number | Emergency Number |
|---|-----------------------------|------------------------------------|
| West Wendover Fire Department | (775) 664-2274 | |
| West Wendover Police Department | (775) 664-2930 | Dispatch: (775) 664-4393 or 911 |
| West Wendover Ambulance | (775) 664-2081 | |
| AirMed (Air Medical Evacuation) University of Utah Hospital Helicopter | (801) 581-2121 | Dispatch: (801) 581-2500 or 911 |
| Intermountain Life Flight LDS Hospital | (801) 321-3330 | Dispatch: (801) 321-1234 or 911 |
| North Tooele County Fire District | (435) 882-6730 | |
| Grantsville Fire Department | (435) 884-3343 | |
| Grantsville Police Department | | |
| Grantsville Ambulance | (435) 882-0873 | Dispatch: (435) 882-5600 or 911 |
| Tooele County Sheriff | unty Sheriff (435) 882-5600 | |
| Tooele Police Department | | |
| Tooele Ambulance | (435) 882-1900 | |
| National Poison Control | (800) 222-1222 | |
| National Response Center | (800) 424-8802 | |
| Utah Division of Waste Management and Radiation Control | (801) 536-0200 | After Hours: (801) 536-4123 |
| Clean Harbors Corporate Office | (781) 792-5000 | |
| U.S. EPA Region 8 | (303) 312-6312 | |
| Utah Highway Patrol | (801) 965-4518 | |
| Bureau of Land Management (BLM) | (801)-977-4300 | |

Table 2-2. External Notification Summary

The BLM requires that the state office be notified within six hours of any reportable spill or release that occurs along the right-of-way route.

Table 2-3. Bureau of Land Management Supplemental Notification

| BLM Contact and Title | Office | Phone |
|---|------------------|----------------|
| Ms. Lisa Everett Deputy State Director, Support Services (Acting) | BLM State Office | (435) 781-4459 |

2.2. IMPLEMENTATION OF THE CONTINGENCY PLAN

Immediately upon deciding to implement the Contingency Plan, the Emergency Coordinator shall direct the following activities, as appropriate for the situation:

- 1. Initiation of containment and control procedures, as described in Section 3.0.
- 2. Performance of a head count to account for all facility personnel and visitors. This will be accomplished by comparing personnel onsite with the sign-in/sign-out sheets.
- 3. Implementation of internal notification procedures, including providing an assessment of the situation to authorities and requesting assistance if needed.
- 4. Coordination of first-aid activities if injuries are involved, and activation of the Casualty Control Procedures described in Section 5.0.
- 5. Evacuation in accordance with the Evacuation Plan in Section 6.0.

2.3. INTERNAL NOTIFICATION AND RESPONSIBILITIES

Any employee who discovers a fire or hazardous materials release shall immediately notify the Emergency Coordinator (Table 2-2) and personnel in the immediate area who may be in danger. Only one individual will act as the Primary Emergency Coordinator during an emergency. The next designated alternate shall assume responsibility if the primary is not available at that time.

2.4. EXTERNAL NOTIFICATION

A list of off-site contacts that may require notification during an emergency is in Table 2-3. The Emergency Coordinator will determine the appropriate agencies to notify for each incident. The Emergency Coordinators (Primary and alternates) will be trained in the notification requirements as part of the Personnel Training Program (Attachment II-4).

Specific notification shall be made to the Department of Environmental Quality, Division of Waste Management and Radiation Control if a spill of either of the following occurs:

- (a) One kilogram (i.e., 2.204 pounds) of a P-listed waste (i.e., acutely hazardous discarded commercial chemical product) or
- (b) One hundred kilograms (i.e., 220.4 pounds) of any other hazardous waste or material.

This notification to DEQ must include the following information:

- (a) Name, phone number, and address of CHGM and the Emergency Coordinator.
- (b) Name, title, and phone number of individual reporting the spill.
- (c) Time and date of spill.
- (d) Location of spill as specific as possible including nearest town, city, highway, or waterway.
- (e) Description contained on the manifest and the amount of material spilled.
- (f) Cause for the spill.
- (g) Emergency action taken to minimize the threat to human health and the environment.

2.5. GENERAL RESPONSIBILITIES

The Emergency Coordinator has been given the following responsibilities and authorities during an emergency incident:

- (a) Coordinating all response measures.
- (b) Directing the emergency crew during each operating shift.
- (c) Designating other employees to assist where necessary.
- (d) Expending all necessary resources to appropriately address the situation in a timely manner.
- (e) Returning used and expended equipment to operating condition if reusable.
- (f) Providing and securing all necessary medical assistance.
- (g) Soliciting assistance from external response agencies.
- (h) Making all required immediate governmental notifications by telephone and filing all necessary written reports and notifications.

An Emergency Coordinator shall always be on-call and reachable via telephone or two-way radio. During an emergency event, CHGM management personnel shall maintain continuous communication on a radio frequency selected by the Emergency Coordinator or using another communication medium. CHGM management personnel will notify other responding agencies of the selected means of communication and appropriate channel when they arrive at the site.

The Emergency Coordinator is authorized to activate emergency response procedures by assembling equipment and determining its proper application. Section 4.0 describes the emergency equipment available to the Emergency Coordinator both from on-site inventories and off-site resources.

All personnel reporting information to an off-site third-party response group will do so after the Emergency Coordinator indicates the need. The person making such notification will give the following information:

- (a) Name, telephone number and location of facility.
- (b) Time and type of incident (e.g., fire, spill, etc.).
- (c) Extent of injuries, if any.
- (d) Possible hazards to human health and the environment.

2.6. IDENTIFICATION OF WASTE MATERIAL AND HAZARD ASSESSMENT

As soon as possible, the Emergency Coordinator will determine the character, source, and extent of any released materials by visual inspection and reference to manifests, sample analyses, waste profile sheets, and chemical hazard reference books.

Initial assessment shall include the following parameters, where necessary:

- (a) Origin of spill or release.
- (b) Condition of the source (e.g., repairable leak, uncontrollable leak, easily moved or unmovable).
- (c) Container identification (e.g., label or placard information, type, and size of individual containers).
- (d) Physical state of spill (e.g., powder, pellets, granular, liquid, or gaseous).
- (e) Color of material.
- (f) Noticeable reactions (e.g., fuming, flaming, gas evolution, heat generation).

After the materials have been identified to the fullest extent possible, the Emergency Coordinator shall assess possible hazards, both direct and indirect, to human health or the environment, and subsequently notify the appropriate site personnel and authorities.

The Environmental Coordinator's hazard assessment will include information gathered from other site personnel. The Emergency Coordinator will receive oral reports from responsible individual(s) regarding the condition of all on-site personnel. At least one individual will relay attendance information taken from the sign-in/sign-out list located in the Waste Receiving office. The Emergency Coordinator will also receive information from other personnel concerning the presence and extent of personal injury or casualties. The Emergency Coordinator will assure the appropriate organizations are notified if a personal injury or casualty situation exists (i.e., hospitals, helicopter evacuation service, etc.) Based on their knowledge of the existing conditions, the Emergency Coordinator will determine the following:

- (a) The extent of injuries, if any.
- (b) Possible hazards to the environment and human health inside and outside the facility.
- (c) Whether or not facility personnel can control the situation. If not, immediately notify the appropriate off-site authorities listed in Table 2-3.
- (d) Whether or not to evacuate the facility. If so, then activate the Facility Evacuation Plan (Section 6.0).
- (e) Whether access to the general area of the facility should be restricted through control of the facility access road from Interstate 80.

Delegation of responsibilities may occur in the event of a minor spill of relatively innocuous material during a weekend and possibly at other times such as holidays. In this situation the Emergency Coordinator will be contacted by phone and may elect to direct the response over the telephone. However, a major incident would require the Emergency Coordinator to come to the site and direct remedial operations in person. An explosion during normal working hours will require the direct participation of separate personnel filling all the separate functions and positions described in Section 3.2; whereas a minor incident during working hours would typically be remediated by the personnel responsible for the area in which the incident occurs after notifying the Emergency Coordinator.

3.0 CONTAINMENT AND CONTROL ACTIVITIES

The operations of the facility are designed to minimize potential hazards to facility personnel, contain released materials, and prevent their movement from the facility.

3.1. Engineering Features of the Facility Designed to Contain and Control Releases

Surface drainage from the active portion of CHGM is collected in a series of berms, dikes, swales, ditches, and culverts, and routed to run-off control basins or ponds. These retention basins are normally empty because of the infrequency of precipitation and the extent of evaporation. A leaker impound is constructed near the sample platforms for any type of leaking container or truck.

Spills at the facility would be initially contained using pumps and stabilization materials. Stabilization materials are typically available from the stabilization area. Pumps are located throughout the facility and can be made available for remediation purposes by contacting operations personnel.

3.2. PERSONNEL RESPONSE ACTIVITIES

The facility is generally prepared to handle incidents that could cause potential emergencies (e.g., fires, explosions, spills, or materials releases). The Emergency Coordinator will supervise incident response and direct facility personnel as needed. The Emergency Coordinator is responsible for initiating the following containment and control activities:

3.2.1. For a Spill or Material Release

- (a) Assemble the required response equipment (e.g., personal protective equipment, powered equipment, stabilization reagent, foam chemical suppressants, pumping equipment, etc.).
- (b) Provide the most appropriate containment or diking method (e.g., earthen dikes, excavation, over pack drums, etc.).
- (c) Coordinate the activities of the site personnel while maintaining constant communication with supervisory personnel.
- (d) Monitor all facility instrumentation to prevent adverse reactions to other processes.

3.2.2. For a Fire or Explosion

- (a) Assemble required response equipment.
- (b) Determine the best method of approach and containment:
 - i. Approach from up-wind direction.
 - ii. Utilize foam vapor and fire suppressants using either fire extinguisher or trailer mounted unit.
 - iii. Utilize dry chemicals if appropriate as in instances with flash-back potential.
 - iv. Cool affected containers with flooding quantities of water.

3.3. Assignment of Response Personnel

The Emergency Coordinator may assign personnel to perform the following positions/functions:

3.3.1. Communications Coordinator

- (a) Contact Corporate Office.
- (b) Advise off-site response organizations as directed by the Emergency Coordinator.
- (c) Report status to the Emergency Coordinator.

3.3.2. Casualty Control Officer

- (a) Assess the extent of injuries or casualties if any.
- (b) Ensure that prompt emergency medical attention is provided as needed.
- (c) Ensure that appropriate off-site medical organizations are notified and responding as necessary.
- (d) Report status to Emergency Coordinator.

3.3.3. Personnel Coordinator

- (a) Coordinate the movement of personnel to designated gathering points in the event of evacuation.
- (b) Conduct headcount and identify location of all personnel present.
- (c) Establish access control to facility.
- (d) Report status to Emergency Coordinator.

3.4. Response Procedures for Containers/Container Management Units

Standard response actions presented throughout this Contingency Plan apply. Specific response criteria and procedures for fire, explosions, or spills that may occur in the container management areas are as follows:

3.4.1. Response Criteria

The potential for a fire or explosion occurring in these areas is low. However, spills from discrete containers (e.g., drums, bags, buckets, boxes, etc.) are more likely to occur because of the frequent handling of containers and temperature variability (i.e., freeze/thaw and extreme heat).

If one of the following events occurs, CHGM will implement a response procedure.

- 1. A fire or smoldering waste in or near the waste containers.
- 2. Explosion or the potential for explosion.
- 3. A spill or material release while unloading, sampling, storing, or transferring containers.

3.4.2. Response Procedures

3.4.2.1. Fire or Explosion

- 1. Immediate evacuation of the personnel endangered within the area and call for back-up support.
- 2. All response personnel will don appropriate protective clothing and a Self-Contained Breathing Apparatus (SCBA) (if necessary), depending upon the source and nature of the fire.
- 3. Active working areas have ABC-type fire extinguishers readily available on process equipment for fighting small fires. Water spray will be used to control vapors and suppress non-chemical fires as appropriate. Table 4-1 outlines the location of fire extinguisher at the facility.
- 4. The cleanup residues will be contained via excavation, sumps, or berm construction.

3.4.2.2. Spill or Material Release

- 1. Spills occurring while loading, unloading, or transporting waste shall be cleaned up immediately and placed in containers or disposed directly to the landfill using equipment appropriate for the task.
- 2. Spills occurring during the transport of contaminated wastes within the facility shall be contained within sumps or with absorbents, temporary containment booms, or vacuum trucks, as appropriate. The material will be collected and placed in containers for processing or disposal. Soil the Emergency Coordinator determines to be potentially contaminated will be removed, sampled according to the WAP, and disposed of as appropriate.
- 3. All equipment used during containment and clean-up operations will be decontaminated or discarded. Rinse waters will flow to a sump for subsequent removal, analysis, treatment, and disposal.

3.5. Response Procedures for Landfill Units

Standard response actions presented throughout this Contingency Plan apply. Specific response criteria and procedures for fire, explosions, or spills that may occur in or around the landfill units are as follows:

3.5.1. Response Criteria

The potential for an explosion occurring in these disposal areas is low since waste is treated prior to placement in the land disposal units. However, if any of the situations below develop, CHGM will implement a response procedure.

- 1. Spontaneous combustion from materials placed into the landfill cells.
- 2. Exothermic conditions resulting from incompatible waste being co-mingled.
- 3. Spills or material releases during the loading, unloading, or transferring waste.
- 4. Spills or material releases resulting from equipment failure.

3.5.2. Response Procedures

3.5.2.1. Fire or Explosion

- 1. Immediate evacuation of personnel endangered within the area and call for backup support.
- 2. All response personnel will don appropriate protective clothing and a SCBA (if necessary), depending on the source and nature of the fire.
- 3. The landfill areas have ABC-type fire extinguishers readily available to fight small fires (Table 4-1). Water spray from site trucks may also be used.

3.5.2.2. Spill or Material Release

- 1. Spills occurring while loading, unloading, or transferring wastes shall be cleaned up immediately. Spill residues will be collected and treated or disposed of as required by the applicable permit conditions and/or regulations.
- 2. All equipment used during the containment and cleanup operations will be decontaminated or discarded. Rinse waters will be treated and disposed of according to the applicable permit conditions and regulations.

3.6. Response Procedures for Bulk Liquid Storage Tanks

Standard response actions presented throughout this Contingency Plan apply. Specific response criteria and procedures for fire, explosions, or spills that may occur at any of the bulk liquid storage tanks areas are as follows.

3.6.1. Response Criteria

The potential for a fire or explosion occurring in any of these areas is very low. However, if one of the following incidents occurs, CHGM will implement a response procedure.

- 1. A fire from equipment and waste interactions (i.e., sparks).
- 2. An explosion from incompatible reagent or waste additions.
- 3. A fire from an unexpected exothermic reaction of out-of-specification treatment reagents.
- 4. Spills or material releases while loading, unloading, or other transfer of waste.
- 5. Spills or material releases resulting from equipment failure.

3.6.2. Response Procedures

- 3.6.2.1. Fire or Explosion
 - 1. Immediate evacuation of personnel endangered within the area and call for backup support.
 - 2. All response personnel will don appropriate protective clothing and a SCBA (if necessary), depending on the source and nature of the fire.
 - 3. The tank areas have ABC-type fire extinguisher presented in Table 4-1, which are readily available to fight small fires. Water spray from site trucks may also be used.

3.6.2.2. Spill or Material Release

- 1. Spills occurring while loading, unloading, or transferring waste shall be cleaned up immediately. Spill residues will be collected and treated or disposed of as required by the applicable permit conditions or regulations.
- 2. All equipment used during the containment and cleanup operations will be decontaminated or discarded. Rinse waters will be treated and disposed of according to the applicable permit conditions and regulations.

3.7. RESPONSE PROCEDURES FOR THE STABILIZATION AREA

Standard response actions presented throughout this Contingency Plan apply. Specific response criteria and procedures for fire, explosions, or spills that may occur in the waste stabilization area are as follows:

3.7.1. Response Criteria

- 1. A fire or explosion that occurs during the mixing of waste with reagents.
- 2. A fire or explosion that results from the inadvertent mixing of incompatible wastes.
- 3. Spills that occur while loading, unloading, or transferring waste.

3.7.2. Response Procedures

- 3.7.2.1. Fire or Explosion
 - 1. Immediate evacuation of personnel endangered within the area and call for backup support.
 - 2. All response personnel will don appropriate protective clothing and a SCBA (if necessary), depending on the source and nature of the fire.
 - 3. The stabilization tank areas have ABC-type fire extinguishers readily available to fight small fires (Table 4-1). Water spray from site trucks or water used in the stabilization process may also be used.

3.7.2.2. Spill or Material Release

- 1. Spills occurring while loading, unloading, or transferring wastes shall be cleaned up immediately. Spill residues will be collected and treated or disposed of as required by the applicable permit conditions or regulations.
- 2. All equipment used during the containment and clean-up operations will be decontaminated or discarded. Rinse waters will be treated and disposed of according to the applicable permit conditions and regulations.

4.0 AVAILABLE EMERGENCY EQUIPMENT

CHGM maintains several communications systems and a variety of on-site equipment suitable for emergency response. The minimum placement of emergency equipment can be found on Figures 4-1 and 4-2 and in Tables 4-1 and 4-2. Tables 4-3 through 4-5 identify the minimum quantities of various PPE and spill response equipment available at the facility.

4.1. COMMUNICATIONS SYSTEMS

The facility is equipped with communications systems that can be utilized in the event of an emergency. The facility maintains internal and external communication.

4.2. ON-SITE SPILL RESPONSE EQUIPMENT

Primary emergency response equipment is maintained at the facility in a state of operational readiness. (Figures 4-1 & 4-2). Tables 4-1 through 4-5 list the minimum types and quantities of available emergency equipment. This includes:

- 1. Water supply for fire response, which can be delivered both by a pipeline system and vehicles (site water trucks).
- 2. Fire extinguishers including A, B, and C class units (Table 4-1).
- 3. Fixed and portable emergency eyewash units (Table 4-2).
- 4. Personal protective equipment (Table 4-3).
- 5. Emergency first aid equipment (Table 4-4).
- 6. Spill Response Equipment (Table 4-5).

4.3. OUTSIDE CONTRACTORS

The commercial spill response vendors listed in Table 4-6 will be called in the unlikely event that the Emergency Coordinator deems the on-site spill control, countermeasure, and containment equipment insufficient to address the situation at hand.

4.4. TRAINING

In accordance with the Personnel Training Plan (Attachment II-4), CHGM personnel are trained to use the various emergency response systems. These training activities may involve a combination of the following:

- 1. On-site training conducted by facility management, training coordinators, and online resources.
- 2. Vendor-provided training for purchased systems.
- 3. Contractor-provided training in procedures for emergency response.
- 4. Contractor-provided emergency medical training.
- 5. Contractor-provided training in firefighting technique and operation of the facility firewater response system.

When appropriate, CHGM shall inform local response agencies when training will be conducted at CHGM and invite local response agencies to send representatives.

4.5. REMOVAL OF EQUIPMENT FOR TRAINING PURPOSES

Any equipment identified in this Contingency Plan may be removed from its identified location and used for training, provided it is returned to the identified location as soon as the training is complete. A tag or sign will be left in place of the piece of equipment indicating where it can be located, the name of the person who removed the item, and the approximate time it will be returned. The item will be inspected for readiness status prior to return.

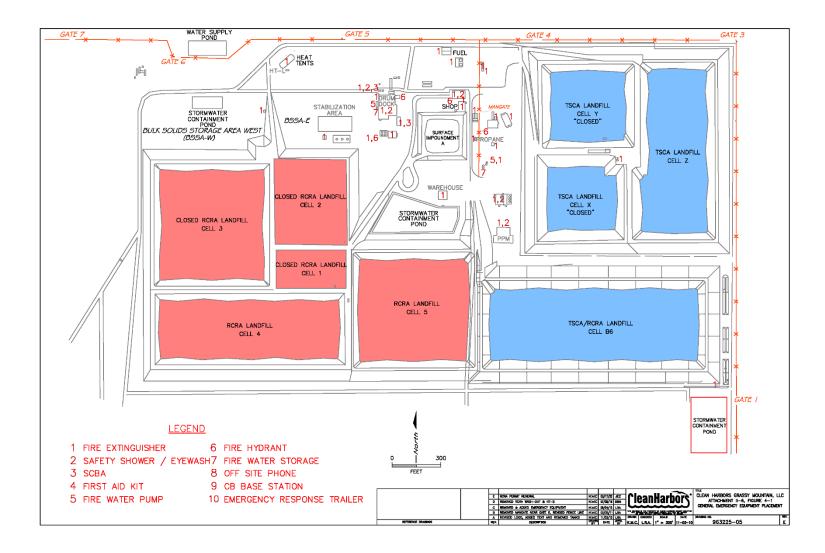


Figure 4-1. Emergency Response Equipment (Operations Area)

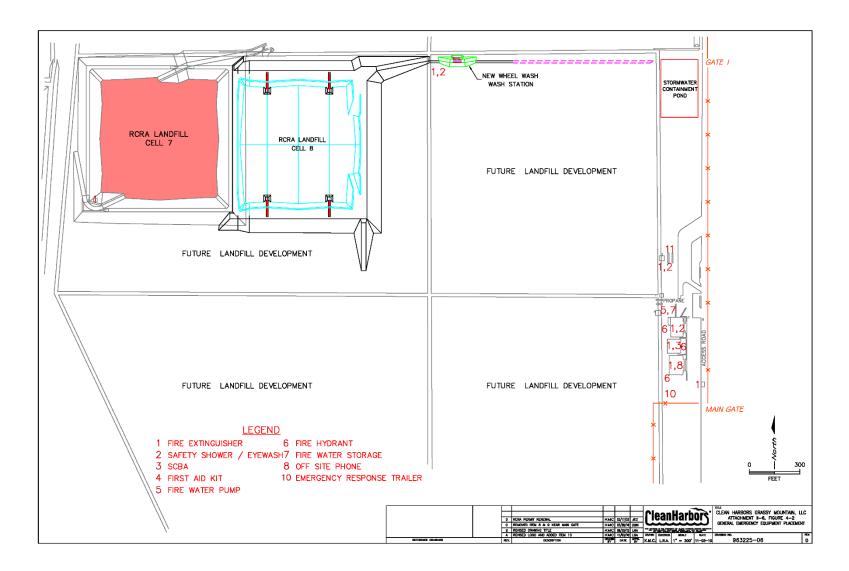


Figure 4-2. Emergency Response Equipment (Admin/Lab Area)

| 1. Dr | Chemical ABC | Quantity |
|--------|--|-------------|
| a. | Operation Area Locker Room | (1) |
| b. | Stabilization | (2) |
| с. | Leachate Tank | (1) |
| d. | Leachate Pump Building | (2) |
| e. | North Equipment Maintenance Bldg. | (2) |
| f. | South Equipment Maintenance Bldg. | (1) |
| g. | RCRA Wheel Wash | (1 at each) |
| h. | Shed by Cell B/6, each | (1) |
| i. | Guardhouse | (1) |
| j. | Fuel Area | (2) |
| k. | Facility Maintenance Bldg. | (2) |
| 1. | Thaw Tent | (1) |
| m. | Drum Dock | (5) |
| n. | Operations Area Emergency Generator | (1) |
| 0. | Employees Lunchroom (non-smoking) | (1) |
| p. | Administration | (3) |
| q. | Locker Room | (5) |
| r. | Laboratory | (4) |
| s. | Generator\UPS | (2) |
| t. | Sampler's Storage | (1) |
| u. | Sample Platforms | (2) |
| v. | Drum Dock Office (Operations Area) | (1) |
| 2. Ha | lon or Equivalent Fire Extinguisher | Quantity |
| a. | PPM PCB Tank Farm | (1) |
| 3. Fix | ed Halon or Equivalent System | |
| a. | Records Storage Room (Administration Area) | |
| 4. Fix | ed Wet System | |
| a. | Drum Dock | |
| b. | Administration | |
| c. | Locker Room | |
| d. | Laboratory | |

Table 4-1. Fire Extinguisher Types Maintained at the Facility

Table 4-2. Emergency Eye Wash and Shower Units

| LOCATION | QUANTITY | DESCRIPTION |
|-----------------------|----------|---------------------|
| Drum Dock Building | 4 | Eyewash and showers |
| Stabilization | 1 | Eyewash and Shower |
| Wheel Washes (1 each) | 3 | Eyewash |
| Laboratory | 4 | Showers |
| Laboratory | 6 | Eyewashes |

 Table 4-3. Personal Protective Equipment in the Spill Response Trailer

| DES | CRIPTION | QUANTITY |
|-----|--|-----------|
| 1. | Safety Glasses | (12 pair) |
| 2. | Face Shields | (6) |
| 3. | Goggles | (12 pair) |
| 4. | Chemical Resistant Safety Boots | (12 pair) |
| 5. | Boot Liners | (12 pair) |
| 6. | Fully Encapsulating Suits | (2) |
| 7. | Standard Tyvek Suits | (25) |
| 8. | Saranex w/ Hoods | (25) |
| 9. | Coveralls | (6) |
| 10. | Insulated Coveralls | (6) |
| 11. | Standard Work Gloves | (12 pair) |
| 12. | Neoprene Gloves | (12 pair) |
| 15. | Disposal Vinyl Gloves (multiple sizes) | (100) |
| 14. | Glove Liners | (12 pair) |
| 15. | SCBA | (4) |
| 16. | Full Face APR | (6) |
| 17. | Organic Vapor/Acid Gas Cartridges | (24) |
| 18. | Ammonia/Methylamine Cartridges | (24) |
| 19. | HEPA Cartridges | (24) |
| 20. | Hard Hats | (12) |
| 21. | Disposable Fully Encapsulating Suits | (6) |
| 22. | Silver Shield Gloves | (10) |

Table 4-4. Emergency Medical Equipment

| DES | DESCRIPTION | |
|--|---|------|
| 1. | Large Weatherproof First-Aid Kit | (1) |
| 2. | Splints | (3) |
| 3. | Emergency Blankets | (3) |
| 4. | 4. Resuscitator Kit (including an Automated External Defibrillator (AED)) | |
| 5. | Cold Packs | (12) |
| 6. Stretcher | | (2) |
| Note: Items 1 through 6 are in the Exam Room in the Administration Building. One stretcher is in the site ambulance and the other is in the Spill Response Trailer | | |

Table 4-5. Spill Response Equipment in the Spill Response Trailer

| DES | DESCRIPTION | |
|-----|---|------------|
| 1. | Spill Control Booms | (120 feet) |
| 2. | Powdered Absorbent (25# bags) | (10) |
| 3. | Bung Wrench (non-sparking) | (1) |
| 4. | Water Tank (10 gallon or larger) | (1) |
| 5. | Pressurized Spray Tank | (1) |
| 6. | Tool Kit (non-sparking) | (1) |
| 7. | Plastic Tubs | (3) |
| 8. | Plastic for Containing Runoff (sq. ft.) | (1000) |
| 9. | Non-sparking Shovel | (1) |
| 10. | Drum/Leak Repair Kit | (1) |
| 11. | Manual Drum Deheader | (1) |
| 12. | 55 Gallon Drums (open head) | (2) |
| 13. | Hand Pump | (1) |

| | CONTRACTOR'S NAME | TYPE OF SERVICE | TELEPHONE NUMBER |
|----|--|-----------------|---|
| 1. | Enviro Care, Inc., | Spill Response | 801-299-1900 24-Hour Emergency 800-820-9058 |
| 2. | Clean Harbors Tooele Field Services | Spill Response | 435-843-4840 |
| 3. | Veolia Environmental Services | Vacuum Truck | 801-294-7111 |
| 4. | Christensen & Griffith | Heavy Equipment | 801-531-8155 or 435-882- 0062 |
| 5. | Wheeler Machinery | Heavy Equipment | 801-974-0511 |
| 6. | H&E (formerly ICM) | Heavy Equipment | 801-974-0388 |

Table 4-6. Commercial Spill Response Vendors

5.0 CASUALTY CONTROL

The Casualty Control Coordinator is designated by the Emergency Coordinator and is responsible for the prompt delivery of quality emergency medical attention to injured personnel by obtaining the necessary medical resources. This may include summoning off-site medical resources, such as the University of Utah (AirMed) helicopter evacuation service, Intermountain Life Flight, ambulance service, or other delivery of injured personnel to medical facilities.

A medical doctor must examine all injured personnel before they can resume work.

During the emergency, the Casualty Control Coordinator:

- a) Assesses the emergency to determine both the extent of injuries and the potential for further injuries.
- b) Implements (or advises the Emergency Coordinator) measures necessary to reduce the likelihood of further injury.
- c) Summons the appropriate off-site medical resources and coordinates their arrival.
- d) Provides relief to injured persons by coordinating personnel trained in emergency medical treatment and the use of medical equipment (Table 4-4).
- e) Assesses the hazards presented by released materials using reference books and the resources identified in Table 2-3 of this plan.
- f) Coordinates the admission of any injured personnel to hospital.

6.0 EVACUATION PLAN

The Emergency Coordinator, a named alternate (Table 2-2), or the most senior staff member present at the time of the event are the only people authorized to order the evacuation of the facility in response to an emergency that threatens the health and safety of the people at the facility. Evacuation of the facility may be ordered based on the judgment of the Emergency Coordinator or at the request of local authorities.

The evacuation routes are presented in Figure 1-2.

6.1. FACILITY ACCESS AND EGRESS

CHGM is in a remote section of the west desert of Utah and the nearest permanently occupied residence is 35 miles away. Because of its isolation, the likelihood of impact on other parties is low. The only personnel likely to be affected by an emergency event are those people who have business at the facility and have traveled the distance necessary to conduct that business.

Access to CHGM is always controlled. CHGM's standard procedure is to log all persons arriving and leaving the site. CHGM will continue this procedure during an emergency. CHGM shall establish complete security during the activation of the Contingency Plan, so that only people who can contribute to the resolution of the emergency will be admitted to the facility until the crisis has passed.

6.2. PROCEDURES FOR EVACUATION

The Emergency Coordinator, or a named alternate (Table 2-2), will carry out the evacuation of CHGM in the following manner:

- a) Start the emergency siren.
- b) Advise CHGM personnel of the source of danger and order them to evacuate with an announcement over the facility loudspeaker and handheld radios.
- c) Use the primary evacuation route unless personnel must cross the incident or pass downwind of the incident to reach the gathering point. Alternate evacuation routes will be announced as described in 6.2.b.
- d) Dispatch representatives to the collection points identified on the Evacuation Route Plan (Figure 1-2) to conduct a head count and report to the Emergency Coordinator or Personnel Coordinator.
- e) Account for all personnel present at CHGM by comparison with the sign-in/sign-out sheets.

6.3. COMMUNITY IMPACT CONSIDERATIONS

The Emergency Coordinator will take the following actions to assure that local response authorities are capable of properly responding to an emergency at the facility:

- a) Submit the approved Contingency Plan and Quick Reference Guide to all emergency response authorities and relevant governmental officials.
- b) Review the Contingency Plan with all interested personnel of local emergency authorities.
- c) Extend the training offered to facility personnel to representatives of the local response authorities.
- d) Advise local response authorities of upcoming drills and invite their participation.
- e) Maintain a log of all actions taken to advise, train, and coordinate with local agencies.

6.4. RE-OCCUPANCY OF THE FACILITY

The Emergency Coordinator, in consultation with responding emergency service agencies, will make the determination that the facility may be safely re-occupied. CHGM activities will resume only after the Emergency Coordinator has given approval.

7.0 POST-EMERGENCY PROCEDURES

Post-emergency procedures are intended to prevent the recurrence of the causative factors, to collect and dispose of residuals, decontaminate equipment, restock utilized materials, and debrief personnel.

7.1. PREVENTION OF RECURRENCE

The Emergency Coordinator will take all necessary steps to minimize the potential of a secondary release, fire, or explosion occurring after the initial incident. Procedures available to the Emergency Coordinator include:

- a) Monitoring all pressure gauges, where applicable.
- b) Inspecting for any leaks or cracks in pipes, valves, tanks, or containers.
- c) Inspecting for gas generation.
- d) Isolating all collected waste materials.

No operations that were shut down because of the incident will be reactivated until approved by the Emergency Coordinator. The Emergency Coordinator will document all emergency actions and the actions taken to prevent recurrence in the contingency plan implementation report.

7.2. TREATMENT AND DISPOSAL OF RELEASED MATERIALS AND CLEANUP RESIDUES

Once the emergency has been controlled, the Emergency Coordinator will initiate the collection and disposal of residues. This will be done as soon as possible after the event to avoid further risk to human health and the environment.

Liquid spills occurring within a containment area (e.g., sumps, loading/unloading area, etc.) will be analyzed, treated, and disposed in accordance with the WAP. Liquid wastes will be either pumped as a fluid or stabilized to allow management as a solid. Leaking containers will be immediately placed into a drum or processed immediately.

The Emergency Coordinator will coordinate with operations personnel to utilize whatever waste management procedures are necessary to address the special requirements of the emergency event. They will pay particular attention to segregating incompatible materials.

7.3. DECONTAMINATION AND SERVICING OF EQUIPMENT

After the crisis has passed, all equipment used during the response to the emergency event will either be disposed of appropriately or decontaminated and prepared for further use. Most of the response equipment will be decontaminated using the spray cleaners in the wheel wash units. Rinse water will be recognized as contaminated spill materials and treated appropriately.

Expended spill response equipment (i.e., fire extinguishers), PPE, and emergency medical equipment will be recharged, restocked, and evaluated to ensure functionality as soon as practicable. Failure to maintain equipment at minimum levels during this restocking and resupply period will be acceptable if expended items are reordered within two business days and if back-up equipment is available.

7.4. PERSONNEL DECONTAMINATION, DEBRIEFING AND RETRAINING

All personnel involved in responding to the emergency will be decontaminated, if necessary, in the shower room area and change of clothing will be provided. Once all affected personnel have completed decontamination, the shower room will be decontaminated. If the situation dictates, initial decontamination shall occur in the field outside of the contaminated zone.

Prior to releasing responding personnel, the Emergency Coordinator shall interview them to determine their interpretation of the relevant events. Based on this interview, the Emergency Coordinator may make recommendations concerning the best methods to prevent or minimize the impact of the emergency. Revisions to either the Contingency Plan or operating procedures may be made because of the incident. A report will be filed with the Director of the Division of Waste Management and Radiation Control (Director) within fifteen days in accordance with permit conditions I.R. and II.L.

7.5. RESUMPTION OF OPERATIONS

Following the emergency event, normal operations may resume in the affected areas once the following conditions are met:

- (a) All spilled material has been collected or adequately contained.
- (b) No incompatible materials have been co-mingled.
- (c) All injured personnel are being provided with adequate medical care.
- (d) The appropriate regulatory authorities have been notified of the event and the subsequent response activities and the intention to resume normal activities.
- (e) All required emergency equipment in the affected area is clean and fit for intended use or a backup is available.

8.0 ARRANGEMENTS WITH OFF-SITE RESPONSE & REGULATORY AUTHORITIES

A current copy of this Contingency Plan, including revisions, shall be sent to all local response and regulatory authorities identified in Table 2-3. These organizations will be contacted as necessary in emergencies. CHGM periodically offers to share training programs with representatives of these organizations.

CHGM maintains records at the facility that document the dates when plans and modifications were submitted to the agencies in Table 2-3, when meetings were held with them, and when they were invited to participate in training sessions.

9.0 REPORTING SPILLS

Section 103 of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) requires CHGM to immediately notify the National Response Center whenever there has been a release of a "reportable quantity" (RQ) of a hazardous substance into the environment. It also requires notification of the Tooele County LEPC and the State Emergency Response Commission for releases of an RQ that will affect personnel outside of the facility boundaries. RQs are defined in 40 C.F.R. § 302.

In accordance with R315-263-33, additional written notification must be made to the state of Utah for spills of 100 Kg for hazardous waste, or 1 kg of P-listed hazardous waste, within fifteen days. Written notifications are to be made to the Director using one of the following methods:

| United States Postal Service | P.O. Box 144880 Salt Lake City, Utah 84114-4880 |
|------------------------------|--|
| FEDEX or UPS | 195 North 1950 West Salt Lake City, Utah 84116 |
| Email | dwmrcsubmit@utah.gov |

The following information is required for reporting purposes:

- Name of the material and quantity spilled.
- Extent of injuries if any.
- An assessment of actual or potential hazards to human health or the environment.
- Estimated quantity and disposition of recovered material that resulted from the spill.

Documentation of the completed reports is maintained in the Clean Harbors WinWeb Incident Management System and will be maintained as part of the operating record.

10.0 AMENDMENTS TO CONTINGENCY PLAN

This Contingency Plan shall be reviewed and immediately amended under the following circumstances:

- (a) The Contingency Plan fails to meet reasonable expectations in an actual emergency.
- (b) Applicable permits or approval letters to the facility are revised or amended.
- (c) CHGM alters the design or operation of its processes in way that materially increases the potential for fires, explosions, or release of hazardous waste or materials.
- (d) The regulations applicable to the facility change.
- (e) After showing reasonable cause.
- (f) The inventory of emergency response equipment changes.
- (g) Key personnel change (e.g., Emergency Coordinator or Alternate Coordinators).

11.0 NOTIFICATION OF UNAUTHORIZED TRANSFER OF TSCA REGULATED MATERIALS

Should any event occur that results in the unauthorized transfer of TSCA regulated materials from permitted areas in quantities below the threshold of a spill or material release (i.e., less than a reportable quantity), the following Contingency Plan actions will be initiated.

1. Within 24 hours of discovering that any material has been improperly removed from the TSCA facility, the facility General Manager or their designee shall verbally notify EPA Region 8 (EPA) and the Director (or their representative). This notification will provide basic information regarding the nature of the material, the location of the material, plans to recover the material and other relevant facts.

- 2. Within five business days of discovering that any material has been improperly removed from the TSCA facility, the facility General Manager or their designee shall submit a written notification letter to EPA Region 8 and the Director. This notification will provide basic information provided in the verbal notification and additional facts gathered following the verbal notification, including:
 - (a) The nature of the material,
 - (b) The location of the material,
 - (c) Plans to recover the material,
 - (d) Other relevant facts, and
 - (e) A written action plan, which may include (without limitation):
 - i. Actions taken to identify the source of the material (e.g., the generator(s) and specific equipment or material(s) involved),
 - ii. Plans to recover the material,
 - iii. Sampling intended for the material,
 - iv. Locations the material may have been placed or handled, and
 - v. Plans for decontaminating locations that samples have identified as contaminated. Surface samples exceeding 10 micrograms per 100 square centimeters PCBs shall be considered contaminated.
- 3. At the conclusion of the actions taken under the written notification and action plan, CHGM shall submit a summary report to EPA Region 8 and the Director. The summary report will include the results of all sampling, description of any decontamination efforts (if required) and the results of confirmation sampling performed to demonstrate successful remedial action.