

ATTACHMENT 3

PREPAREDNESS AND PREVENTION PLAN

3.A. SECURITY MEASURES

- 3.A.I. The Facility provides security with a variety of equipment. The Facility is secured with a six-foot high chain link fence topped by barbed wire. All access gates are locked when the Facility is unoccupied and warning signs stating “Danger - Unauthorized Personnel Keep Out,” are visible from twenty-five feet, and are posted at the entrances. Outdoor lighting is provided during low-light hours of the day. The office/warehouse building is secured with locks on all doors and warning signs are posted at all entrances to work and waste storage areas.
- 3.A.II. The pumps for the tank system shall not be activated unless waste material is being added to the tank by the Facility. The pump controls for the waste tank are located inside the warehouse to prevent unauthorized material being placed in the tank and as a deterrent to vandalism during non-business hours.
- 3.A.III. The doors to the metal shelter container storage area shall be closed and locked at the end of the operating day. A warning sign shall be posted on the metal shelter container storage area.

3.B. FACILITY DESIGN

- 3.B.I. The Facility is designed and operated to minimize the possibility of spills or fires and to minimize the effects of any accidents that may occur. Specifications and descriptions for the container storage areas, tank, secondary containment and other equipment are included in ATTACHMENTS 7 and 8.

3.C. PLANT OPERATIONS

- 3.C.I. Employees shall perform their duties in the safest, most efficient manner possible and the service center shall be equipped to facilitate these activities. Drums shall be moved using a handcart and pallets using a forklift or pallet jack. Upon arrival at the service center, containers of waste shall be added to the storage tank or placed in a container storage area. Open drums of solvent shall not be left unattended. Occasionally, waste may be left on a truck overnight. If this occurs, the Facility representative, prior to leaving the service center, shall note it on the Facility inspection record. The waste shall be removed from the truck before the end of the next business day.
- 3.C.II. Potential Minor Spill Sources
- 3.C.II.a. The following is a list of activities that have the potential for a minor (one that can be remediated without assistance from a clean-up contractor) pollution incident:

- 3.C.II.a.i. Pouring of drummed solvent into the wet dumpster/drumwasher -- As the drums are poured into the dumpster, solvent may splash out. Employee training emphasizes the importance of using care in emptying the drums. The return and fill station is underlain by a concrete slab and curb. This design should contain this type of spill.
- 3.C.II.a.ii. Filling of drums with solvent product -- A low-pressure hose with an automatic shut-off valve, similar to those used at automotive service stations, is used to fill the drums with solvent. Leaking fittings, a damaged hose or human error could lead to the discharge of solvent outside of the drum. Emergency shut-off valves are available, should the equipment not function properly. In addition, employee training emphasizes the importance of inspection, maintenance and reporting of conditions with pollution incident potential.
- 3.C.II.a.iii. Moving of containers -- When a container is moved, a potential exists for it to tip over due to human error. To minimize the potential for spillage of solvent, all containers are maintained in an upright position and remain tightly covered while in storage or in transit.
- 3.C.II.a.iv. Delivery truck transfers -- Cargo shall be secured in the route vehicle with straps before transport. Individual containers can tip over or be dropped when being moved on or off a delivery truck, so transfers shall be made using a handcart and a hoist, if necessary. If a spill does occur, the amount of solvent in the containers is a quantity that can be collected with absorbent material. Any contaminated soil that results from a spill shall be removed manually, drummed and shipped to a disposal facility for proper disposal.
- 3.C.III. Potential Major Spill Sources
 - 3.C.III.a. The following activities have the potential for a major (one for which remedial action shall require assistance) pollution incident:
 - 3.C.III.a.i. Overfilling of storage tanks -- The storage tanks can be overfilled with a resulting discharge of solvent. A high level alarm and checks of tank volumes each business day should prevent this type of incident.
 - 3.C.III.a.ii. Leaking pipelines -- The pipelines and other equipment present a potential for leaks and resultant pollution. Regular inspection of this equipment and of the solvent inventory should detect any leaks.
- 3.C.IV. Potential Fire Sources
 - 3.C.IV.a. The following is a list of fire prevention and minimization measures:
 - 3.C.IV.a.i. All wastes and clean solvents shall be kept away from ignition sources -- Personnel shall confine smoking and open flames to remote areas, separate from any solvent (e.g., the office or locker room). The solvent handling area, metal shelter container storage area and the aboveground storage tanks are separated

from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.

- 3.C.IV.a.ii. Ignitable wastes shall be handled so that they do not:
 - 3.C.IV.a.ii(A). Become subject to extreme heat or pressure, fire or explosion, or a violent reaction -- Solvent waste and paint wastes shall be stored in a tank or in drums, none of which shall be near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are protected with a pressure relief device, a backup Morrison Brother's 244 eight-inch E-vent, and the drums stored in the warehouse shall be kept at room temperature to minimize the potential for pressure build up. Spark-proof clean up equipment shall be utilized to prevent a fire and/or explosion.
 - 3.C.IV.a.ii(B). Produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health -- The vapor pressure of Safety-Kleen's petroleum-based solvent is low (2 mm Hg) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts or gases should not form in quantities sufficient to threaten human health since strong oxidizers shall be kept segregated in accordance with Uniform Fire Code guidelines in the permitted storage areas at the Facility.
 - 3.C.IV.a.ii(C). Produce uncontrolled flammable fumes or gases in quantities sufficient to pose a risk of fire or explosion.
 - 3.C.IV.a.ii(D). Damage the structural integrity of the device or Facility.
 - 3.C.IV.a.iii. A minimum of two feet for aisle space shall be maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the Facility operation in an emergency.
 - 3.C.IV.a.iv. "No Smoking" signs shall be posted in areas where solvents are handled or stored.
 - 3.C.IV.a.v. Fire extinguishers and the fire suppression system shall be checked once per week and tested by a fire extinguisher maintenance company once per year.

3.D. EXTERNAL FACTORS

- 3.D.I. The design of the installation is such that a harmful spill caused by external factors is unlikely to occur. The storage tanks are inaccessible to non-Facility personnel and the pump switches are located inside of the building. Also, the container storage areas are in buildings that are inaccessible to unauthorized personnel.
 - 3.D.I.a. Vandalism -- Only extreme vandalism would have the possibility to result in a solvent spill or fire. Responses to spills and fires are described in the Contingency Plan.
 - 3.D.I.b. Power failure -- A power failure is not likely to result in a spill or fire.

- 3.D.I.c. Flooding -- The site elevation is above the projected 100-year flood plain, therefore a 100-year flood is not likely to affect the service center.
- 3.D.I.d. Storms or Cold Weather -- The solvent return and fill station is roofed to eliminate the possibility of rain or snow from entering the dumpsters. No opportunity is foreseen to affect the service center with snow, cold weather or storm water.

3.E. EQUIPMENT

3.E.I. Internal Communications

3.E.I.a. Because the Facility is small, internal communications within the facility are by voice, intercom or telephone. Telephones are located in the office, return and fill station, and at the safety station near the metal shelter for paint waste storage.

3.E.II. External Communications

3.E.II.a. Telephones will be used to report a spill or a fire and to summon assistance from local and state emergency response agencies.

3.E.III. Emergency Equipment

3.E.III.a. The minimum required emergency equipment and its location are identified in Drawings 716601-QJPB002, Rev D and 7113-WB00-004, Rev G which are included as part of this Attachment.

3.E.III.b. The metal storage shelter includes a dry chemical fire suppression system and a fire hydrant is located within 185 feet of the southeast corner of the facility having a maximum flow of 5,900 gallons per minute.

Insert Drawings 716601-QJPB002, Rev D and 7113-WB00-004, Rev G