



Contingency Plan
For
**Chemical Waste Management of the Northwest,
Inc.**

Arlington Facility • ORD 089 452 353
17629 Cedar Springs Lane
Arlington, Oregon

Standalone Document No. 4

This document is issued by the
Oregon Department of Environmental Quality

April 2018

PREFACE..... iv

CONTINGENCY PLAN..... 1-1

1 GENERAL FACILITY DESCRIPTION..... 1-1

1.1 Facility Identification Location and Site Plan 1-1

1.2 Facility Operations 1-1

1.3 Hazardous Wastes Handled at the Facility 1-2

1.4 Types of Potential Emergencies 1-2

1.4.1 Emergencies Inherent to Industrial Facility Operations..... 1-2

1.4.2 Natural Events 1-3

Figure 1-0

Removed rev 102 IMPLEMENTATION OF RESPONSE PROCEDURES

2-1

2.1 Incident Assessment and Decision Process 2-1

2.2 Implementation of Contingency Plan 2-2

2.2.1 Internal Notification and Responsibilities..... 2-2

2.2.2 Additional Contacts..... 2-2

2.2.3 General Responsibilities..... 2-3

2.2.4 Identification of Waste Material and Hazardous Assessment..... 2-4

TABLE 2-1

TABLE 2-2

TABLE 2-3

Figure 2-1

Figure 2-2

3 CONTAINMENT AND CONTROL ACTIVITIES..... 3-1

3.1 General Procedures..... 3-1

3.1.1 Facility Provisions..... 3-1

3.1.2 Personnel Response Activities 3-1

3.1.2.1 Emergency Coordinator (EC) Activities 3-1

3.1.2.2 Personnel Coordinator Activities 3-2

3.1.2.3	On-Site.....	3-2
3.1.2.4	Casualty Control Officer (CCO) Activities	3-3
3.2	Process-Specific Procedures	3-3
4	AVAILABLE EMERGENCY EQUIPMENT	4-1
4.1	Alarm and Communication Systems	4-1
4.2	On-Site Equipment	4-1
	removed Rev 104.4	Off-Site Resources
	4-2	

TABLE 4-1

5	CASUALTY CONTROL	5-1
6	EVACUATION PLAN	6-1
6.1	Site Access and Egress	6-1
6.2	Evacuation Procedures	6-1
6.3	Community Impact Considerations	6-2
6.4	Re-Occupancy of Facility	6-2
7	POST-EMERGENCY PROCEDURES	7-1
7.1	Prevention of Recurrence	7-1
7.2	Treatment and Disposal of Released Materials and Cleanup	7-1
7.3	Decontamination and Maintenance	7-2
7.4	Reactivation of Activities in the Affected Area	7-2
7.5	Personnel Debriefing and Retraining	7-2
8	ARRANGEMENTS WITH LOCAL AUTHORITIES AND OTHER RESOURCES	8-1
8.1	Emergency Response Agencies	8-1

TABLE 8-1

8.2	Casualty Control Agencies ‡ Rev. 7.....	8-2
9	INCIDENT REPORTING	9-1
9.1	Contingency Plan Implementation	9-2
9.1.1	Report incident to local authorities and request emergency support, if needed.	9-2
9.1.2	Give the Following Information to All Notified Agencies and Authorities:	9-2
9.1.2.1	Report the Incident Verbally to:	9-2
9.1.2.2	Within 24 hours of the Incident.....	9-2
9.1.2.3	Report the Incident to	9-2

9.1.3	Prior to Resumption of Operations and After Cleanup Provide:	9-2
9.1.4	Within Fifteen Calendar Days of the Incident	9-3
9.1.5	Sudden Drop in the Liquid Level of an Impoundment	9-3
9.2	Reportable Quantity under Federal and Oregon Law.....	9-3
9.2.1	Report the Incident verbally.....	9-3
9.2.2	Within 24 Hours of the Incident.....	9-4
9.2.3	Report the Incident	9-4
9.2.4	Submit a Written Report	9-4
9.3	Exceptions	9-5
10	AMENDMENTS TO THE CONTINGENCY PLAN.....	10-1
	APPENDIX A.....	1
	TABLE A-2	
	APPENDIX B – PROCESS SPECIFIC CONTAINMENT AND CONTROL PROCEDURES... 1	
B1	RCRA CONTAINER STORAGE OPERATIONS (EXISTING)	1
B2	BULK LIQUID STORAGE/TREATMENT (EXISTING)	2
B3	STABILIZATION OPERATIONS	3
B4	WASTE IMPOUNDMENTS (EXISTING)	5
B5	LANDFILLS (EXISTING).....	7
B6	WASTEWATER TREATMENT PLANT	9
B7	RCRA 90 DAY STORAGE AREAS/SATELLITE ACCUMULATION AREAS.....	10
B8	CONTAINMENT BUILDINGS.....	11
B9	CRUSHING FACILITY (EXISTING).....	13
B10	ORGANIC RECOVERY UNIT (ORU) and ASSOCIATED OPERATIONS IN B5.....	14

PREFACE

The Arlington Facility will maintain a copy of the *Contingency Plan* detailing procedures to "minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water." (40 CFR 264 Subpart D).

The Contingency Plan is intended to cover the hazardous waste at the facility as well as wastes being transported to the facility From Columbia Ridge Landfill rail yard. The provisions of this plan would be implemented for incidents on the haul road and cover wastes being handled at the transfer station at Columbia Ridge Landfill and Recycling Center's rail yard adjacent to CWMNW.

In the event of an emergency which results in fire, explosion, or accidental material release, response activities are initiated following observation of the event. An assessment of the situation is performed immediately by the Emergency Coordinator (EC). Response activities are directed as appropriate and the decision is made whether or not to implement the *Contingency Plan*.

The *Contingency Plan* provides an explicit description of the response procedures to be implemented in an emergency situation, which will protect the public, personnel at the facility, and the environment. The *Contingency Plan* will be implemented as detailed in this plan, as determined by the EC. The facility has various structural and operational measures in place to minimize the possibility of such an emergency situation occurring, as described in this Plan. This plan also provides notification requirements for releases or discharges of hazardous waste that might threaten human health of the environment and for releases of a reportable quantity of a hazardous substance, hazardous material or oil

CONTINGENCY PLAN

1 GENERAL FACILITY DESCRIPTION

The Chemical Waste Management of the Northwest, Inc. (CWMNW) Arlington Facility is located near the town of Arlington in Gilliam County, Oregon. The facility is designed to store, treat, and dispose of solid, semi solid, and liquid hazardous wastes.

1.1 Facility Identification Location and Site Plan

- Name: Chemical Waste Management of the Northwest, Inc.
EPA ID No. ORD 089 452 353
- Location: The facility is located approximately 12 miles by road from the town of Arlington in northeastern Oregon. The route to the site is as follows: Interstate 84 to Arlington; south on Highway 19 from Arlington; west on Route 445 (Cedar Springs Lane) (approximately 7 miles from Arlington); site entrance is clearly marked on right hand side of Cedar Springs Lane, approximately 5 miles west from its intersection with Highway 19. These are the only major access roads within 5 miles of the site. The route to the site is shown on Figure 1 0.
- Facility Operator: Chemical Waste Management, Inc.
- Name and Mailing Address: 17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454 2030

Figure 1-0 provides a location and vicinity map of the facility. The figure identifies the project site and the roadways to the site. Activation of the Contingency Plan will be triggered, as determined by the EC, if an incident occurs at the site or during the authorized shipment of wastes to the facility along the roads shown on Figure 1 0, or while the waste is being held or transferred at Columbia Ridge Transfer Station rail yard east of CWMNW. ‡ **Rev. 5**

1.2 Facility Operations

The Arlington Facility is located in a remote upland area of northeastern Oregon, approximately 7.5 miles by air south from the Columbia River. Surrounding land use is agricultural range land. The active area of the site is located on the Shutler Flats plateau, above Alkali Canyon. There is one employee residence on-site along Cedar Springs Road. The nearest non-CWMNW residence is located approximately 1.6 miles to the west along Cedar Springs Lane.

The uppermost groundwater is found beneath the site at approximately 100 to 200 feet below the ground surface. A system to monitor the quality of this water-bearing zone is in place at the site. New landfill areas and all waste impoundments are lined.

Surface water runoff from the hazardous waste management areas is collected and directed to a sediment basin. As the site expands, future runoff sedimentation basins may be constructed.

All site facilities are inspected on a periodic basis, in accordance with the facility's *Inspection Plan* to detect signs of leaks or potential failure. Groundwater is monitored in accordance with the facility's *Groundwater Monitoring Plan*.

The facility presently manages hazardous wastes using the following operations:

- Stabilization
- Size Reduction
- Storage
- Solar Evaporation Waste Impoundments
- Landfills
- Waste Water Treatment Plant Area
- Bioremediation
- Thermal Desorption ‡ Rev. 5

1.3 Hazardous Wastes Handled at the Facility

The facility stores, processes, and disposes of a variety of hazardous and non-hazardous wastes. Wastes are received in bulk form (e.g., in tank trucks); in containers (e.g., drums, small tanks); or in solid form (e.g., in end dump trucks). Appendix A lists the waste types typically handled at the facility, including the location within the facility where these wastes generally would be found. Each hazardous waste type is described by EPA hazard rating (i.e., Ignitable [I], Reactive [R], Toxic [T], or Corrosive [C]).

1.4 Types of Potential Emergencies

The potential for an emergency exists at the Arlington Facility due to its operational activities and the types of materials it handles. Additionally, natural events ("Acts of God") could create an emergency situation at the facility that must be managed appropriately and effectively. Events which potentially could trigger implementation of the Contingency Plan are addressed below.

1.4.1 Emergencies Inherent to Industrial Facility Operations

Potential emergencies which could result from any industrial facility operation include:

Fire

- Could cause the release of toxic fumes
- Could spread and possibly ignite materials at other on site locations, or cause heat induced explosions.
- Could produce contaminated runoff from fighting fire with water or chemical fire suppressants.
- Could cause physical burns.

Explosion

- Could cause a safety hazard from flying fragments or shock waves
- Could ignite other hazardous wastes at the facility
- Could result in release of toxic material

Spill or Material Release

- Could result in release of flammable liquids or vapors capable of causing a fire or gas explosion hazard
- Could cause the release of toxic liquids or fumes
- Could result in contamination of surface water

Accident (vehicle or equipment)

- Could cause fire, explosion, or spills described above
- Could result in mixing of incompatible chemicals
- Could cause surface contamination through release of toxic liquids
- Could cause air contamination through release of fumes.
- Could cause physical injuries

Bomb Threat

- Could cause physical injuries
- Could cause fire
- Could cause property damage
- Could interrupt operations

1.4.2 Natural Events

The Arlington Facility has the potential for emergencies caused by "Acts of God," including major climatological, geophysical, or other terrestrial events, such as:

- Fog
- Dust storms
- Range fires
- Volcanic ash fallout
- Lightning storms
- Earthquakes

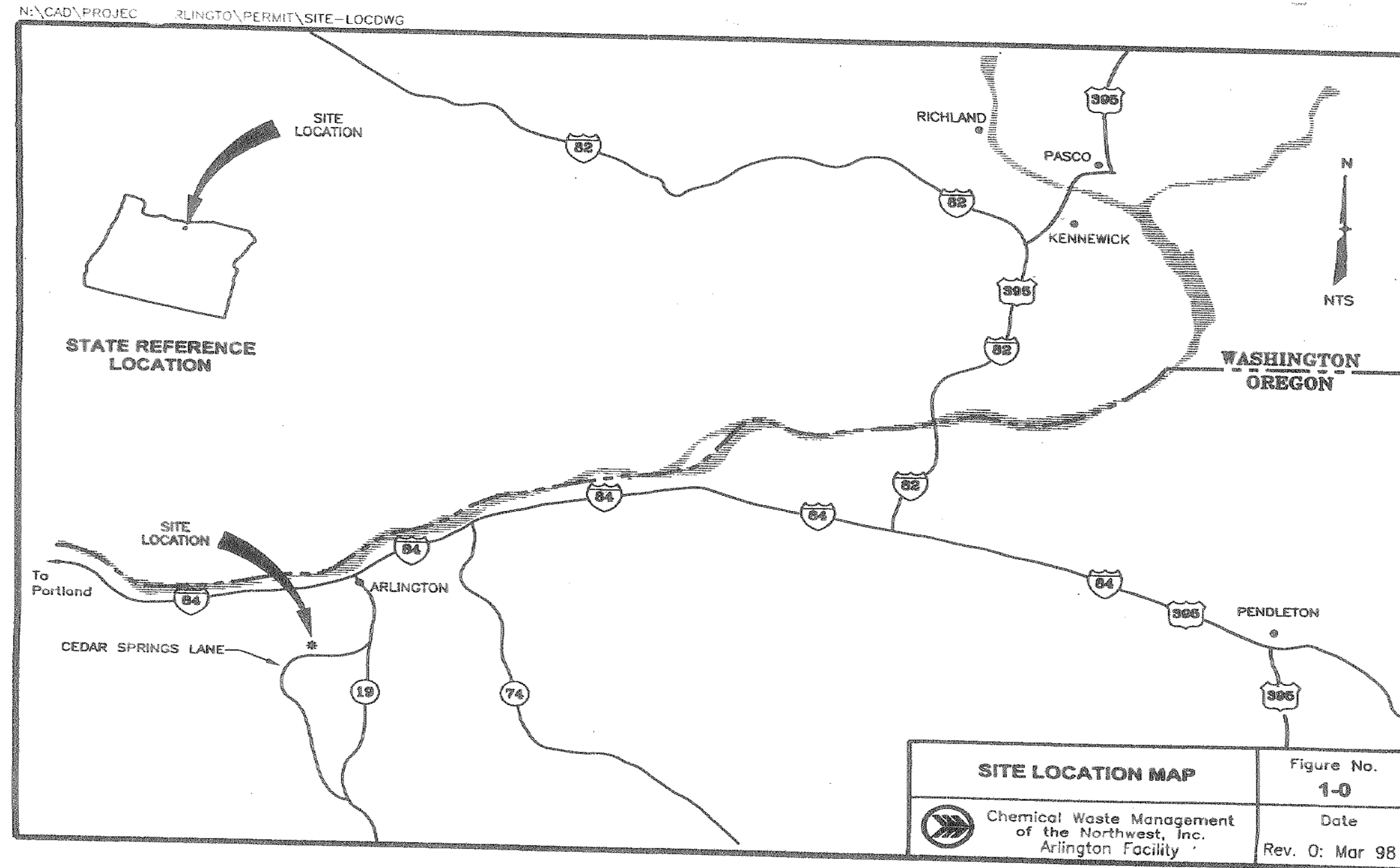


Figure 1-0

2 IMPLEMENTATION OF RESPONSE PROCEDURES

In the event of an emergency which results in fire, explosion, or accidental materials release, response activities are initiated following observation of the event. An assessment of the situation is performed immediately by the Emergency Coordinator (EC). Response activities are directed as appropriate and the decision is made whether or not to implement the *Contingency Plan*.

2.1 Incident Assessment and Decision Process

A logic diagram of initial response activities leading to implementation of the *Contingency Plan* is shown on Figure 2-1. Should a fire, explosion, spill or natural event be of a minor or controllable nature, which presents no potential hazard to human health or the environment, the EC or other appropriate personnel will only implement the procedures described in Sections 7.1 through 7.5 as appropriate and the EC will complete any necessary reporting as provided in Section 9.0. Unless there is direct evidence to the contrary a spill or release onto the ground at the facility of less than a reportable quantity of a hazardous substance, hazardous material or oil is presumed not to present a potential hazard to human health or the environment and will be managed under the procedures described in Sections 7.1 through 7.5 as appropriate.

Emergency Alert is the initial communication alert for notification and assessment of an observed, unexpected condition which potentially may be harmful to human health or the environment. The sequence of events for Emergency Alert communications is:

- Upon observation of an unexpected condition, employee(s) will proceed immediately to an area that is safe from being involved with the condition.
- When a safe area is reached, employee(s) will notify Base 1 by telephone or radio of the condition. Employee(s) will provide the following information:
 - His/her name
 - Specific location of the incident
 - Description of the condition
 - Personnel involved (if any)
 - Wind direction or other pertinent weather conditions
 - Any other specific relevant information.
- Following the notification of the condition, employee(s) will begin isolation of the affected area.
- A Base 1 operator will sound the Emergency Alert at the direction of the EC. The Emergency Alert system consists of two sirens; one on the water tower, and one on building S-2. Additionally, an announcement is made over the radio and/or paging system that the emergency response procedures are being implemented. All site personnel will cease their activities immediately and will go to a designated assembly area. ‡ Rev. 2

- The EC will identify personnel assembly areas, personnel response teams, and initiate calls to notify the authorities with an assessment of the situation and a request for assistance, if needed.
- The EC will set up a command post and take control of the affected area until the emergency has been eliminated and necessary clean up or restoration is completed. Figure 2-2 presents the corporate authorization for this authority.

The EC will direct the following activities:

- Where applicable, see that processes and/or operations are stopped, and that any released materials are contained and collected in order to ensure that fires or explosions do not occur or spread.
- Determine the source and extent of the released materials and assess the direct and secondary hazards. Evaluation criteria used by the EC to determine if the *Contingency Plan* is to be implemented are presented in Table 2-1.
- See that any materials spilled in the incident area are isolated from other incompatible materials.
- Activate and direct the *Contingency Plan* activities pursuant to procedures in Section 2.2, as necessary.

2.2 Implementation of Contingency Plan

- When the decision has been made to implement the *Contingency Plan*, the EC will direct:
- Initiation of containment and control procedures, as described in Section 3.0
- An accounting for all facility personnel/visitors by head count and from sign-in/sign-out forms
- Implementation of internal notification
- Notification of authorities with an assessment of the situation, requesting assistance as necessary
- Coordination of first aid activities, if casualties are involved, and activation of the casualty control procedures described in Section 5.0
- Evacuation, if required, and activation of the evacuation plan described in Section 6.0

2.2.1 Internal Notification and Responsibilities

Any employee discovering a fire, uncontrollable hazardous materials spill, or unexpected condition will immediately notify Base 1 and/or the EC, as well as personnel in the immediate area who may be in danger. The personnel to be notified are identified in the "Notification Action Summary," shown in Table 2.2.

2.2.2 Additional Contacts

The Oregon State Police (Arlington Detachment) or Fire Department will be notified and provided with an assessment of the situation and request for assistance, if needed. The Director

of Operations ‡ Rev. 5 or designee will speak with media personnel if they respond during an emergency. Additional contacts that may be required during an emergency are listed in Table 2.3.

- A facility employee will contact the EC and facility employees using the telephone, paging system, and/or radio. The person making the announcement will begin by stating that the facility is in an "Emergency Alert" followed by the specific message of the information transmitted by the observing employee(s). The purpose of the notification is to initiate the assessment process, warn employees in the affected area, and alert employees to "stand by" (at the head count area) in case the Contingency Plan is implemented.
- All employees assigned to respond to the Emergency Alert condition will have, at a minimum, the following protective clothing and equipment:
 - Hard hat
 - Self contained breathing apparatus (SCBA), including full face respirator or heavy equipment with supplied air (as applicable)
 - Half face respirators
 - Impenetrable boots, steel toed (as required)
 - Impervious coveralls or rain gear
 - Chemical resistant gloves
 - Safety glasses or equivalent
- If the EC assesses the condition as contained, with limited or no potential to be harmful to human health or the environment, the EC may declare the Emergency Alert over, and the "all clear" signal will be given.
- If the EC decides the condition does not endanger personnel, but because of unknown factors could escalate, the EC will take precautionary measures. Precautionary measures, which may be as minimal or as elaborate as the EC considers necessary, are used to facilitate the enactment of the *Contingency Plan*, should it become necessary.
- If the condition is assessed as posing an immediate threat to personnel or the environment, the *Contingency Plan* will be fully implemented on command of the EC.

2.2.3 General Responsibilities

The EC is responsible for coordinating all emergency response measures during any emergency. The EC acts as the director of the emergency crew during each operating shift, with complete and total control of all activities during the incident. The EC also has the authority to designate other employees to assist in the event of an emergency. As shown on Figure 2-2, the EC has been granted full corporate authority to expend all pertinent resources to deal with the situation.

The EC's comprehensive training in emergency response includes:

- Effective utilization of safety equipment and communication devices
- Fire fighting

- Fundamentals of toxicology
- Control, containment, and/or confinement operations within the capabilities and resources available
- Basic Hazard and Risk Assessment (*Contingency Plan*)
- Selection and use of proper PPE
- Understanding of basic hazardous materials terms
- Decontamination procedures

The EC or alternate always will be "on-call," and can be reached via a telephone, stationary radio, mobile phone, or personal pager. The EC's follow a rotation schedule that is posted throughout the facility. On-site personnel have continuous contact of continuous emergency communications via telephones, paging system, and CB radio.

The EC has developed and maintains lines of communication with key community emergency services including fire and police agencies, medical facilities, and emergency response units. Section 8.0 delineates the arrangements which have been made with such organizations to assure their availability and assistance in emergency situations. Section 4.0 describes the emergency equipment available to the EC, both from on-site inventories and off-site resources.

All personnel reporting information to an outside response group (or to CWM's/CWMNW's corporate offices) will do so after the EC indicates the need. In general, the person making such notification will give the following information:

- Name and telephone number
- Name and address of facility
- Time and type of incident (e.g., discharge, fire)
- Name and quantity of material(s) involved, to the extent known
- Extent of injuries, if any
- Possible hazards to the environment and human health outside the facility.

2.2.4 Identification of Waste Material and Hazardous Assessment

As soon as possible, the EC will determine the character, source, and extent of any released materials by visual inspection and reference to manifests, sample analyses, Waste Profile Sheets, and other available sources of information.

- Initial assessment includes the following parameters:
- Origin of the leak
- Condition of the source (e.g., repairable leak, uncontrollable leak, easily moved, unmovable)
- Container identification (e.g., label or placard information, type and size of individual containers)
- Physical state of the spill [e.g., solid (powder, pellet, granular); liquid; or gas]
- Odor, if noticed
- Color of material
- Noticeable reactions (e.g., fuming, flaming, or gas evolution).

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

The EC's hazard assessment will include information from other site personnel. The EC will obtain verbal reports from the responsible individual(s) on the status of all on-site personnel. The Personnel Coordinator will relay attendance information taken from the gate log and status board. The Casualty Control Officer will relay information concerning injuries or casualties and, if necessary, request outside assistance.

Based on knowledge of the existing conditions, the EC will determine the following:

- Can facility personnel control the emergency?
- Is site evacuation necessary? If so, activate *Evacuation Plan* (Section 6.0). If the Casualty Control Officer is required, designate one of the following as the location of the on-site first aid station:
 - Main Office Building
 - Shop Building
- Is evacuation of the local area advisable (see Section 6.3)? If so, communicate necessary information to the Oregon State Police as detailed in Section 9.0.

TABLE 2-1

EVALUATION OF CRITERIA FOR IMPLEMENTATION OF CONTINGENCY PLAN

Fire and/or Explosion

Fire causes the release of toxic fumes.

The fire could spread, thereby possibly igniting materials in other on-site or off-site locations, or could cause heat-induced leaks or explosions.

The use of fire suppressant, either chemicals or water, could result in contaminated off-site runoff.

Explosion has or could:

- result in danger from flying fragments or shock waves
- ignite other hazardous waste at the facility
- release toxic materials.

Fire endangers human health for any other reason.

Spills or Material Release

A spill could release toxic or flammable liquids or vapors, thus causing a fire or gas explosion hazard.

The spill could result in off-site soil contamination and/or ground or surface water contamination.

A spill endangers human health or the environment for any other reason.

Natural Events

Volcanic ash fallout could cause harm to human health and/or the environment.

Dust storms and fog could hinder safe operations and cause facility damage.

Lightning storms could endanger facility personnel, cause fires, and facility damage.

Earthquakes could release toxic or flammable liquids or vapors, thus causing a fire or gas explosion hazard; and/or earthquakes could cause facility damage.

These events may trigger evacuation of on-site personnel and/or the local community, depending on the magnitude and proximity of the event to individuals who may be affected, as determined by the EC.

TABLE 2-2

NOTIFICATION ACTION SUMMARY (‡ Rev. 1, 3, 5, 6 and 7)

On-Site Notification

Report all emergencies to the Emergency Coordinator or Alternate.

<u>Warning System</u>	Mobile Phone or Pagers	
	Paging System	
	CB Radio	
	Base Stations: Receiving (Base 1)	541-454-3292
		541-454-3215
	MSDS Computer Station Office (Base 2)	541-454-2014
	CRLRC Operator (Alternate Base 2)	541-454-2030

<u>Emergency Coordinator (EC)</u>	<u>Phone No.</u>	<u>Home Address</u>
1. Robert Mulholland District Manager	541-371-0646 (mobile) 813-833-0588	400 Shane Dr. Arlington, OR 97812
2. Jeff Bufton Technical Manager	541-980-1716 (mobile)	1225 West 2 nd St. Arlington, OR 97812
3. David Riney (Alternate) Operations Supervisor	541-384-4261 (home) 541-980-8701 (mobile)	511 E Gilliam St Condon, OR 97823

The Emergency Coordinator (or Alternate) will be on call 24 hours a day, 365 days per year. The Emergency Coordinator will notify the following facility personnel:

The EC will notify the family of injured persons and also the appropriate hospital. If casualties are involved, the PC will immediately notify Life Flight (aircraft evacuation service), (911), and/or the Arlington Volunteer Ambulance Service 911. Life Flight has agreed to evacuate site personnel to hospitals or the Burn Center in Portland.

In the event of an enactment of the *Contingency Plan*, the Personnel Coordinator (PC) will notify the Site Residences.

TABLE 2-2

NOTIFICATION ACTION SUMMARY († Rev. 7)

On-Site Notification (Continued)

Personnel Coordinator (PC)

1. Operations Specialist Environmental Technician (Alternate)

The PC located at the facility coordinates a head-count of all site personnel and visitors during an emergency with the On-Site Coordinator.

On-Site/Communications Coordinator (OSC)

1. Operations Specialist
2. Technical Manager (Alternate)

The Personnel Coordinator or EC will notify the following person at the Chemical Waste Management of the Northwest, Inc. office of the emergency after consulting the E.C.:

1. Alan Anderson District Manager
 Chemical Waste Management of the Northwest, Inc.
 Office: (541) 454-2030

After this initial contact, the Communications Coordinator will communicate with the same designated representative throughout the emergency.

The Emergency Coordinator or designee is required to make additional notifications during an emergency. These requirements are detailed in Section 9.0.

TABLE 2-3

GENERIC EMERGENCY CONTACTS († Rev. 5)

<u>Type of Emergency</u>	<u>Contact</u>	<u>Phone Number</u>
Natural Disaster	Oregon Emergency Management Division	(800) 452-0311
	American Red Cross	(541) 296-3210
		(503) 284-1234*
Fire/Explosion Spill or Release	Oregon Emergency Management Division	(800) 452-0311
Injury (also see casualty control procedures, Section 5.0)	Arlington Ambulance	911**
	Life Flight (air transport)	911
	Good Shepherd Hospital	(541) 567-6483
	Mid-Columbia Medical Center	(541) 296-1111

Give the following information to all notified agencies and authorities:

- Your name and telephone number
- Facility name and address
- Time and type of incident (fire, release, etc.)
- Name and quantity of materials involved, to the extent known
- Extent of injuries, if any
- Possible hazards to human health or the environment outside of the facility.

If additional information is needed regarding the nature of the hazards posed by the emergency situation, call:

CHEMTREC	(800) 424-9300
National Poison Control Center	(800) 222-1222

*Emergency phone number after normal working hours.

**All calls to 911 must also be called in to ext. 2030 as 2030 will be the number used by 911 operators for return calls and emergency vehicles typically show up at the CRL Lower Administration Office.

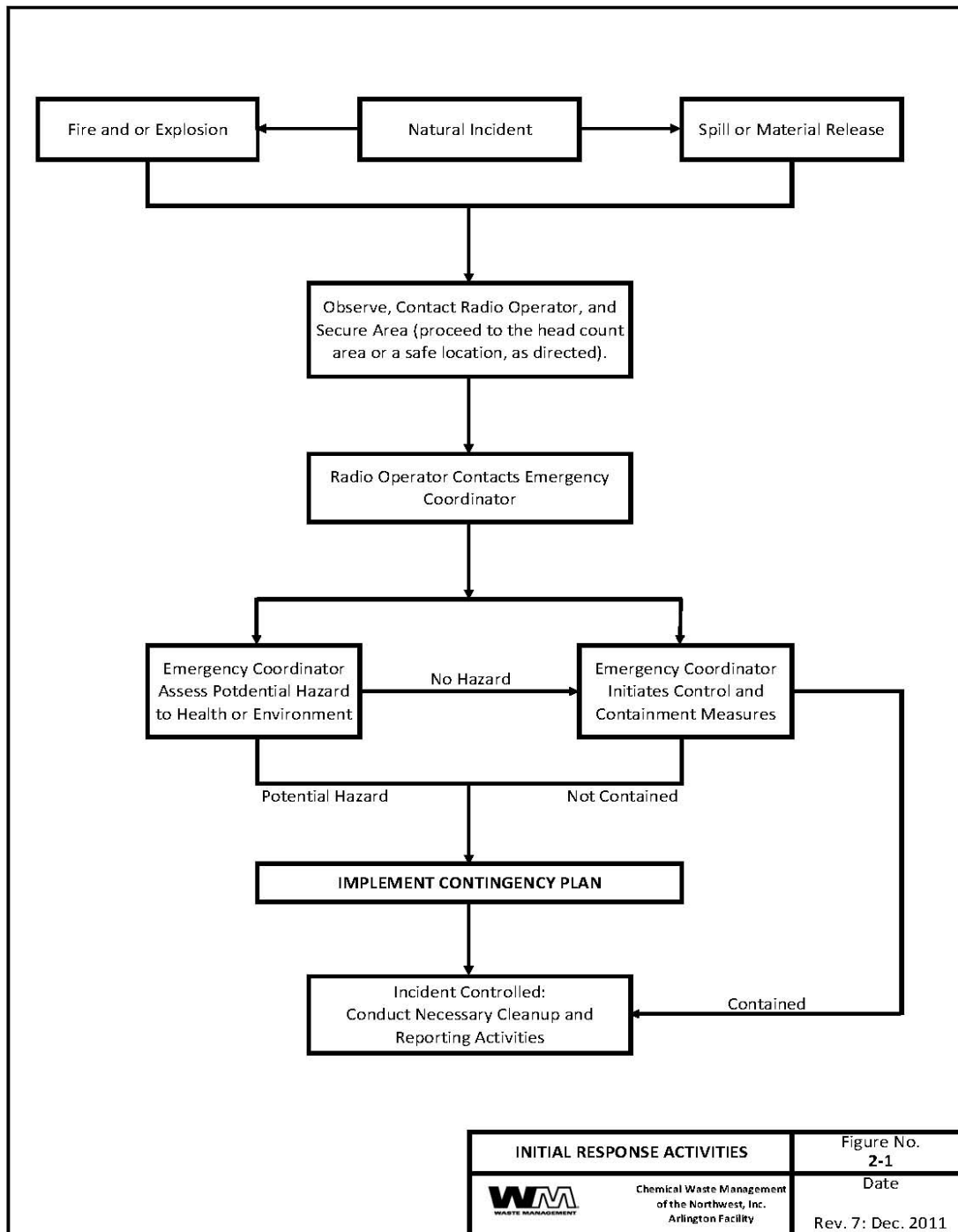


Figure 2-1

Figure 2-2

CORPORATE AUTHORITY

FOR EMERGENCY COORDINATOR

CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST, INC.

CERTIFICATE

I, Jason Rose, the duly qualified and Area Vice President of the Pacific Northwest Market Area of Waste Management, Inc., a Delaware Corporation, hereby certify that I am authorized by the corporation to grant the authorization below.

RESOLVED: That the Corporation hereby grants to the individual(s) designated as “Emergency Coordinator” in the approved Contingency Plan for Chemical Waste Management of the Northwest, Inc. – Arlington to commit such of the Corporation’s resources as are needed to carry out such Contingency Plan; and

BE IT FURTHER RESOLVED: That such individual(s) designated as “Emergency Coordinator” in such approved Contingency Plan be and hereby are authorized, directed, and empowered to execute and deliver for and on behalf of the Corporation any and all such contracts, agreements, documents and memoranda to be necessary and appropriate to execute the herein authorized resolution.

Dated: 1/24/13

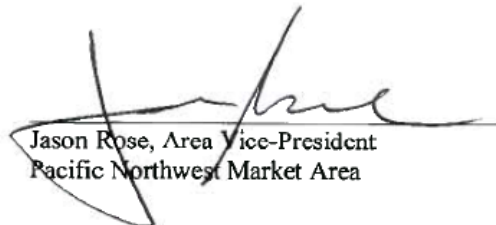

Jason Rose, Area Vice-President
Pacific Northwest Market Area

Figure 2-2

3 CONTAINMENT AND CONTROL ACTIVITIES

The facility's operational systems are designed to minimize the potential hazards to facility personnel, contain spilled materials, and prevent the movement of the spilled materials off-site.

3.1 General Procedures

Operational features and response activities are presented below, including key individual responsibilities. These general procedures apply to all areas of the facility. Process-specific procedures are detailed in Appendix B.

3.1.1 Facility Provisions

Existing surface drainage from the hazardous waste management units flows to the runoff basin. This basin will serve as a containment structure in the event of a major spill on facility roadways or uncontained areas. Spills initially will be contained by the use of berms and absorbent materials.

Processing and storage units have secondary containment features (e.g., retainer walls, curbs, dikes, berms) to prevent uncontrolled releases.

The facility is equipped with electrical generators which can supply essential power to the site in the event of a power loss. The facility emergency alarm is equipped with a generator hookup so that it can be activated if the power supply is interrupted.

3.1.2 Personnel Response Activities

CWMNW is prepared for incidents at the facility which could cause potential emergencies (i.e., the fires, explosions, spills, or material releases discussed in Section 1.4.1). Containment and control activities are initiated by the EC who, with the assistance of other facility personnel, will respond as follows. No on or off-site response will be initiated when compressed gases, gases, unknowns or explosive hazards exist.

3.1.2.1 Emergency Coordinator (EC) Activities

For a spill or release, the EC will mobilize personnel to:

- Assemble the required response equipment [e.g., protective clothing and gear, heavy equipment (bulldozers, grader, front end loader, backhoe), stabilization material (kilo dust), empty drums, drum over-packs]
- Determine the most appropriate containment or diking method (e.g., earthen dikes, excavation, or diversion)
- Coordinate activities of supervisory personnel, maintaining constant communication with them and response teams
- Engage in clean-up activities only

For a fire, the EC contacts the fire rescue team who will mobilize personnel to:

- Assemble required response equipment (e.g. protective clothing and gear, fire extinguishers from vehicles and facilities, fire trucks, portable water tanks, heavy equipment, diking and neutralization material, and empty drums for containment and clean-up of residues)
- Shut off process motors, pumps, valves, and electrical service, as appropriate
- Monitor valves, pipes, or other equipment for leaks, pressure buildup, gas generation, or ruptures, as appropriate
- Determine the best method of approach, containment, and control:
 - Move in from upwind side
 - Utilize dry chemical for large areas where flash-back potential is low
- Cool all affected containers by flooding with quantities of water, as appropriate.
- Use soil for residue containment or absorbents, as needed
- For fires past the incipient stage, the Arlington Fire Department will be called. ‡ **Rev. 5**

For volcanic ash fallout, dust storms, and fog which hinder safe facility operations, the EC will mobilize personnel to:

- Cease operations
- Relocate to a safe place of refuge until the event is over
- Assess the facility for damage after the event is over
- Engage in necessary clean-up and repair activities

For lightning storms and earthquakes, the EC will mobilize personnel to:

- Cease operations which may be dangerous
- Monitor the facility for fires and damage during the event
- Respond within capabilities and training to fires and facility damage
- Engage in necessary clean-up and repair activities

For a bomb threat the EC will mobilize personnel to:

- Cease operations
- Relocate to a safe place of refuge
- Follow guidelines found in the bomb threat procedure

3.1.2.2 Personnel Coordinator Activities

The facility will have a designated PC who will coordinate a "head count" utilizing information available from the security gate log and status board. The PC will maintain an accounting of the location and activities of all personnel during an event.

3.1.2.3 On-Site

- Coordinate communications with on-site supervisory personnel and response teams
- Coordinate movement of personnel to one of the following assembly areas (and relay information to EC):

- Main Office Building
- South end of Shop Building notify off-site emergency assistance/response teams

3.1.2.4 Casualty Control Officer (CCO) Activities

The CCO is responsible for identifying whether any injuries have occurred, advising the EC regarding the nature and extent of the injuries, and contacting off-site emergency services, if required. The CCO will advise the requested emergency service of the nature of the injuries, where the injured are located, and where they should be taken. The CCO will provide whatever assistance the off-site services require.

3.2 Process-Specific Procedures

Each storage, treatment, or disposal operation at the Arlington Facility has built-in control features, containment structures, and equipment to facilitate emergency response procedures. The general procedures described in Section 3.1 apply to all areas of the facility. Containment and control procedures specific to each process are detailed in Appendix B.

4 AVAILABLE EMERGENCY EQUIPMENT

The facility maintains an alarm system, communications system, and emergency response equipment. On-site equipment will enable facility personnel to react and respond to the majority of emergency incidents that may arise. However, if needed, supplemental emergency equipment and supplies will be obtained from outside sources.

4.1 Alarm and Communication Systems

The facility is equipped with a communications network which links the facility with off-site resources. Off-site communication is via the local telephone system. However, CB radios also are available. Telephones connected to the outside are located in the main office building, the laboratory and laboratory offices, the administration building, the heavy equipment maintenance building, the sampling area, the scale house, the lower office building, and the vehicle maintenance building, as shown on Figure 1-1. On-site communications are conducted by telephones, through CB radios, paging systems, and the alarm system. CB radio communications consists of two base stations, Base 1 ‡ **Rev. 6** is located in the upper administration building, and Base 2 is located in the MSDS computer station office, along with mobile units in facility vehicles.

The alarm system sounds two sirens; one located on the water tower, and one on building S-2; which can be heard by personnel throughout the facility, except by personnel operating machinery. These personnel are warned through mobile radios. At times, the lower office personnel may be unable to hear the siren. ‡ **Rev. 2** These personnel will be notified through the telephone, mobile radios, and/or paging system.

4.2 On-Site Equipment

The primary emergency response equipment available at the site includes at least the following:

- Grader, parking line, east of receiving area, used for creating and maintaining fire breaks, location varies with use
- Bulldozer, used for creating and maintaining fire breaks, location varies with use
- Stationary ABC- or BC-type extinguishers, used for fighting incipient stage fires, located in all buildings (see Figure 1-1) and vehicles
- Emergency eyewash and shower units, used for first aid in chemical-to-skin contact
- Permanent first aid stations, used to provide basic first aid supplies are located in the PPE room
- Rescue equipment (life rings, sweep lines), used to extract personnel from difficult-to-reach places, located in the PPE room
- 1-2,000 gallon vacuum truck used for cleanup of spills or material releases, location varies with use ‡ **Rev. 5**
- First aid supplies are located in supervisor vehicles and throughout the facility
- One fire truck, at least 400 gallons, located south of the shop, relocated as necessary ‡ **Rev. 3**

- Crane, located near main entrance to hazardous waste management area

Listed locations may vary due to daily operations. A typical list of safety equipment is provided in Table 4-1.

Fire extinguishers and first aid kits are checked and serviced according to the facility's *Inspection Plan*. Selected facility employees are trained and qualified to administer first aid and CPR.

As a standard safety practice, all employees involved in sampling, loading or unloading, or working in the process areas are issued and use as appropriate the following safety equipment:

- Hard hats
- Safety glasses
- Impenetrable boots, steel-toed (as required)
- Protective coveralls
- Chemical-resistant gloves
- Ear protection
- Respirators

Goggles and face shields also are available for use by all employees.

In addition, the site is serviced by a water system rated to provide a maximum of 300 gpm to the fire hydrants.

4.3 Off-Site Resources

Supplemental emergency equipment and supplies will be available, if needed, from off-site (outside) sources. The Arlington Volunteer Ambulance Service is available to provide 24-hour ambulance service. The service operates one ambulance unit. This unit is equipped with standard emergency response equipment and is capable of transporting five victims simultaneously. It maintains mutual aid agreements with local communities and is in communication with all area hospitals.

The organization Life Flight provides aircraft (fixed-wing and helicopter) evacuation services. Life Flight has agreed to remove site personnel to any regional hospital or to the Burn Center in Portland.

The Arlington Volunteer Fire Department maintains two rural fire trucks with a capacity of 750 gallons each. Special safety equipment includes self-contained breathing apparatus.

Columbia Ridge Landfill is able to provide heavy equipment (various types).

TABLE 4-1¹

‡ **Rev. 6**

TYPICAL SAFETY SUPPLY INVENTORY

First Aid supplies	Stretchers
Goggles	Hard Hats
Ear protection	Face shields
Chemical-resistant gloves	Roll duct tape
Various half and full-face cartridges	Slip-on rubber booties
Various half-face cartridge respirators	Combustible gas meter (location may vary) ²
Chemical-resistant disposable clothing	Colorimetric Tubes & pump (location may vary) ²
Flashlights or hand lanterns ²	Safety glasses
Spare batteries for flashlights ²	ANSI Class II vests
Roll 16-mil. plastic ²	Bung wrench ²
Large First Aid kit	Over-pack drum ²
Shovels ²	Pick ²
Road cones ²	Brooms ²
Floor sweep ²	5 gal. can ²

Scott full-face cartridge respirators

Scott-Air Pak self-contained breathing apparatus, pressure demand type, 30 minute, and extra cylinders

5 CASUALTY CONTROL

During the course of any emergency, all injuries or other casualties will be given first aid, as necessary. For more serious injuries, outside medical assistance will be sought. During an emergency situation, the CCO, under the direction of the EC, will accomplish the following:

- Designate, organize, and direct available first aid personnel. The main first aid station is located in the PPE room.

¹The Emergency Response equipment checklist is located in the PPE room. The PPE room is located in the building attached to the West side of the Maintenance Building.

²Not in supply room but on site.

- Assess information regarding injury causing agents, including toxicity and decontamination. If needed, the following organizations may provide emergency chemical information:

CHEMTREC (800) 424-9300

National Poison Control Center (800) 222-1222

- Assess the situation as determined by the CCO and summon emergency medical assistance from the Arlington Ambulance Service, 911, and/or Life Flight 911. Meet incoming emergency/ medical services and guide them to the first aid station or location of emergency.
- Place injured personnel in the care of qualified medical personnel. The EC will provide casualty control resources to the medical service person in charge.
- Assist the medical service in charge by notifying the appropriate hospital or emergency room of the arrival of casualties, nature of injury, information on toxicity and decontamination, and any other pertinent information. Such information will be transmitted promptly to those with a need-to-know.

6 EVACUATION PLAN

The EC, or alternate, is the only person authorized to call for complete evacuation of the site in response to an emergency situation which threatens the health and safety of facility personnel. The EC may take this action based on an analysis of the situation or at the request of an on-scene public emergency services coordinator (e.g., Oregon Emergency Management Division, Sheriff, Fire Chief, or civil defense coordinator).

6.1 Site Access and Egress

As described in Section 1.2, the facility is located approximately 12 miles by road southwest from Arlington, Oregon. The site can be reached by road by taking Highway 19 south from Arlington to Cedar Springs Lane. The area surrounding the site is predominantly range land, with the nearest non-CWMNW residence located approximately 1.6 miles to the west along Cedar Springs Lane. Facility evacuation routes are shown on Figure 1-1.

The facility is designed and operated to facilitate inspections and emergency response access to any operational area. Enclosed processing areas are designed for emergency response and evacuation.

Facility access normally is restricted. During an emergency, this security will continue to be maintained, except for persons assisting in the response efforts. A detailed enumeration of personnel admitted to the site during an emergency will be maintained. To maintain security, access points to the site utilized during an emergency situation will be manned continuously, to the extent possible.

Procedures for the evacuation of the site and surrounding areas are detailed in the following sections.

6.2 Evacuation Procedures

The following actions will be taken when the EC orders a site evacuation. The EC, or designee, will immediately notify local emergency services, reporting any casualties and arranging for their emergency care, when applicable. The EC will coordinate activities with police, fire department, or other public emergency services as detailed in Section 9.0

- The EC, or designee, will determine which gates will be used depending on the location of the incident, wind direction, and personnel location
- The Facility Telephone Operator or Admin. employee, on instruction from the EC, will broadcast evacuation instructions to area personnel via the facility communication system.
- Area managers or foremen will unlock the required exit gates immediately. The gates are locked during normal operations for security reasons. If bolt cutters are not available or time is critical, personnel are instructed to use their vehicles to crash through the gates
- All non-essential personnel, visitors, and contractors will leave immediately through the exit gate (#1) shown on Figure 1-1

- Evacuation should proceed as follows:
 - If **downwind of incident**, evacuate perpendicularly to wind direction over the most accessible route.
 - If **upwind of incident**, evacuate in the upwind direction.
- Personnel will assemble at one of the designated areas
- The PC will initiate a head count and check it against the sign-in/sign-out sheets located in the main office building. The PC will account for facility personnel at assembly areas. This information will be transferred to the EC and CCO.

6.3 Community Impact Considerations

In anticipation of the extremely remote possibility that areas adjacent to or near the site may be endangered by an on-site incident, a CWMNW representative has discussed with local authorities the procedures for evacuating the surrounding areas. Consistent with these discussions, agreements with these local authorities have been made and are included in Section 8.0. Any fire, explosion, spill, or materials release on-site that threatens any area beyond the site's perimeter fence shall be considered cause for evacuation of that area. The following responsibilities regarding evacuation have been delineated with the local authorities.

- The EC will notify the local authorities of the possible need to evacuate off-site areas. The EC will indicate the nature, extent, and rate of spread (including direction) of potential hazards to the community. This information shall be supplied to the EC by appropriate site personnel (i.e. Lab Manager or Technical Manager) with input from the corporate office of CWMNW.
- Prior to local response, facility personnel will, under the EC's direction, initiate roadblocks and evacuation procedures for areas adjacent to the site.
- The EC will maintain communications with state police and other local authorities and assist in the coordination of the community evacuation, emergency response, and casualty control activities.

6.4 Re-Occupancy of Facility

The determination of when the facility may be re-occupied safely will be made by the EC in consultation with responding emergency services agencies. Procedures for reactivating operations in the affected area are detailed in Section 7.4.

7 POST-EMERGENCY PROCEDURES

Post-emergency procedures are designed to prevent incident recurrence, clean up and dispose of residuals, decontaminate equipment, and provide for personnel debriefing.

7.1 Prevention of Recurrence

The EC will take all necessary steps to ensure that a secondary release, fire, or explosion does not recur after an initial incident. Procedures that will be carried out in the affected area include:

- Monitoring of all pressure valves
- Inspection for any leaks or cracks in pipes, valves, tanks, and drums
- Inspection for gas generation
- Segregation of potentially incompatible residues
- Isolation of all residual waste materials
- Monitoring to ensure that incompatible wastes are not treated, stored, or located in the affected area.

Where monitoring or inspections are required to ensure that a secondary incident does not occur, the EC will designate at least one appropriately trained individual to perform the required monitoring or inspection. The EC will specify the frequency of monitoring or inspection on the basis of the nature of the initial emergency incident, the types of wastes involved, the process involved, and the likelihood of a secondary incident.

Actions to isolate residual waste materials will focus first on segregation of incompatible wastes. As necessary, the EC may order that temporary berms or barriers be placed to segregate potentially incompatible waste residues. Alternately, the EC may order in-situ neutralization of corrosive materials if they could contact and react with other incompatible materials and other segregation techniques are not available.

The EC also will ensure that incompatible wastes are not brought into the affected area for treatment, storage, or temporary placement while post-emergency procedures are underway.

7.2 Treatment and Disposal of Released Materials and Cleanup

Once the emergency situation has ended, the EC will initiate cleanup and disposal of the residues. This will occur as soon as possible in order to avoid further contamination. The EC also will ensure that incompatible wastes will not be treated, stored, or located in the affected area while cleanup and decontamination procedures are underway. Unless there is direct evidence to the contrary, as spill or release onto the ground at the facility of less than a reportable quantity of hazardous substances, hazardous materials or oil is presumed not to present a hazard to human health or the environment and will not result in implementation of the contingency plan. Such a spill or release will be cleaned up and disposed as soon as practicable. A spill or release of a de minimis amount of oil to the ground at the facility such as small spills, leaks, or dripping from pumps, machinery, vehicles, pipes and other similar equipment during normal operations will be cleaned up on a periodic basis during routine maintenance.

Liquid spills occurring within a containment area (e.g., tank or container storage) will be analyzed and removed for treatment and/or disposal in an on-site waste impoundment. Wastes collected in containment sumps will be treated similarly. Spilled liquids that have been cleaned up will be disposed of properly in accordance with Oregon and Federal regulations. Leaking containers will be immediately segregated and repackaged, or drained and repackaged, treated, or disposed of on-site.

7.3 Decontamination and Maintenance

All equipment used during emergency response and cleanup will be decontaminated using site specific procedures and readied for future use. Site personnel will go through the decontamination process following site specific procedures as designated by the Health & Safety Manager or assigned Site Safety Officer. Fire extinguishers will be recharged, personnel protective equipment replaced, and absorbent materials restocked. Before operations are resumed, an inspection of all safety equipment will be conducted.

Decontamination Equipment on-site includes:

- One truckwash facility located east of the laboratory and capable of decontaminating equipment as well as personnel
- Visqueen used for personnel decontamination (location varies)
- Brooms used for personnel decontamination (location varies)
- Personnel decontamination equipment (location varies). Deluge showers located throughout the facility and inside shower facilities used for personnel decontamination.

7.4 Reactivation of Activities in the Affected Area

Once on-site emergency equipment is again ready for use (Section 7.3,) **¶ Rev. 5** the EC will give an "all- clear" signal. The area may be reoccupied, but operations in the affected area that initially were shut down in response to the incident will not be reactivated until this signal has been given and the Department of Environmental Quality has been notified.

7.5 Personnel Debriefing and Retraining

A minimum of one Emergency Response Drill annually will occur, with the involvement (whenever possible) of outside agencies.

The EC will conduct debriefings of site supervisory and operating personnel and local authorities to assess preparedness and prevention activities, response activities, casualty control, and evacuation procedures. Based on this critique, suggestions for revisions to the *Contingency Plan* will be made to facility management.

8 ARRANGEMENTS WITH LOCAL AUTHORITIES AND OTHER RESOURCES

CWMNW has made contact with the local and regional entities and authorities which may be involved in an emergency situation, has provided them with copies of the approved *Contingency Plan*, and has obtained their written agreement to provide emergency services. These and other entities will be provided with copies of any revised *Contingency Plan* as approved. Discussions regarding their specific involvements and coordination are held periodically. These arrangements are confirmed in writing and copies are provided to all parties. Involved agencies are listed on Table 8-1.

8.1 Emergency Response Agencies

As discussed in prior sections, the EC will notify certain authorities if the *Contingency Plan* is implemented as detailed in Section 9.0. The involvement of some of these authorities is summarized below.

The Oregon State Police Department (Arlington outpost) has reviewed the *Contingency Plan* and agreed to provide a support role in facilitating the movement of emergency personnel and equipment and to take the lead in the evacuation of areas surrounding the site, as necessary.

The Arlington Volunteer Fire Department has been provided a copy of the *Contingency Plan* and is given an annual tour of the facility to discuss specifics of the emergency response procedures. Fire Department personnel also are provided briefings on the materials handled at the facility, hazard identification, and first aid procedures.

TABLE 8-1

‡ **Rev. 7**

COORDINATION AGREEMENTS

- A. ARLINGTON VOLUNTEER FIRE DEPARTMENT
P O Box 476
Arlington, OR 97812
Shannon Coppock, Fire Services Coordinator
- Department has copy of approved *Contingency Plan*
 - Department will receive copy of any revised plan
- B. OREGON STATE POLICE
3313 Bret Clodfelter Way
The Dalles, OR 97058
Attn: Sgt./Lt. On-Duty
- Department has copy of approved *Contingency Plan*
 - Department will receive copy of any revised plan
- C. ARLINGTON VOLUNTEER AMBULANCE SERVICE
P O Box 105
Arlington, OR 97812
David Anderson, Operations Officer
- Service has copy of approved *Contingency Plan*
 - Service will receive copy of any revised plan
- D. GOOD SHEPHERD MEDICAL CENTER
610 N.W. 11th Avenue
Hermiston, OR 97838
Rebecca Schwartz, R.N., Emergency Department Director
- Medical Center has copy of approved *Contingency Plan*
 - Medical Center will receive copy of any revised plan
- E. MID-COLUMBIA MEDICAL CENTER
1700 East 19th
The Dalles, OR 97058
Liesl Peterson, Emergency Services Coordinator
Galen Rose, Safety Officer
- Medical Center has copy of approved *Contingency Plan*
 - Medical Center will receive copy of any revised plan
- F. ARLINGTON MEDICAL CENTER
P O Box 314
Arlington, OR 97812
David Anderson, Administrator
- Medical Center has copy of approved *Contingency Plan*
 - Medical Center will receive copy of any revised plan
- G. GILLIAM COUNTY EMERGENCY MANAGEMENT
P O Box 685
Condon, OR 97823
Gary Bettencourt, Sheriff
Chris Fitzsimmons, EM Coordinator
- County has copy of approved *Contingency Plan*

Chemical Waste Management of the Northwest, Inc.
Standalone Document No. 4 • Contingency Plan

- County will receive copy of any revised plan

8.2 Casualty Control Agencies ‡ Rev. 7

The following medical facilities have been notified of potential hazards, have received a copy of the existing Contingency Plan, and will receive any revised copies of the plan:

<u>Facility</u>	<u>Location</u>	<u>Phone</u>	<u>Existing Contact</u>
Good Shepherd Hospital	Hermiston	541-667-3534	Rebecca Schwartz, R.N.
Mid Columbia Medical Center	The Dalles	541-296 1111	Liesl Peterson

9 INCIDENT REPORTING

This section describes the notification and reporting requirements to be followed for certain incidents that occur at the facility. Incidents include implementation of the Contingency Plan, a release of a reportable quantity of a hazardous substance into the environment under federal law, a release or spill or a threatened release or spill of a reportable quantity of a hazardous material or oil into the environment under Oregon law, and a release of a hazardous waste that might threaten human health or the environment.

As discussed in previous sections implementation of the Contingency Plan results in the requirement of certain onsite and offsite notifications. Implementation of the Contingency Plan also results in certain reporting requirements. RCRA 40 CFR §264.56(i), ‡ **Rev. 5** [as adopted and modified in Oregon by OAR 340-100-002 and 340 104 056] requires that any emergency event requiring the implementation of the Contingency Plan will be reported in writing within 15 days to the DEQ. Prior to resumption of normal operations in the affected areas, the DEQ must be notified regarding cleanup status and emergency equipment must be ready for use (Section 7.4). ‡ **Rev. 5**

Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) requires immediate notification to the National Response Center (800/424 8802) as soon as it is known that a "reportable quantity" of a hazardous substance has been released to the environment. Reportable quantities for hazardous substances are provided in 40 CFR table 302.4. Under CERCLA, petroleum products, including crude oil or any fraction thereof which is not otherwise specifically listed or designated are not hazardous substances. ‡ **Rev. 5**

40 CFR 110 et seq contain reporting rules requiring immediate notification to the National Response Center for qualifying oil discharge events. Those events include an oil spill of any quantity that creates a film, sheen or discoloration of the surface of interstate waters or that cause a sludge or emulsion to be deposited beneath the surface of the water. ‡ **Rev. 5**

Oregon law under ORS 466.635 and OAR 340 Division 142 requires that the Oregon Emergency Management Division (800/452 0311) also must be notified immediately after discovery of a spill or threatened release in an amount that exceeds a reportable quantity. ‡ **Rev. 5**

Twenty-Four Hour Reporting. The reporting requirements of 40 CFR 264.56(d)(2) [as adopted and modified in Oregon by OAR 340-100-002 and 340-104-056] and 40 CFR 270.30(1)(6) [as adopted and modified in Oregon by OAR 340-100-002 and 340-105-030] ‡ **Rev. 5** require a verbal report to the Administrator and to the Manager or Inspector on any noncompliance with the permit that might endanger health or the environment (including any release or discharge of hazardous waste that might threaten human health or the environment) within 24 hours of the time the permittee becomes aware of the incident. And within 5 calendar days (unless the Manager and the Administrator waive the five day written notice requirement in favor of a written report within the fifteen days) of the time the permittee becomes aware of the incident, a written report must be submitted. The DEQ has waived the five day written notice requirement in favor of a written report within fifteen days (the Manager and the Administrator on a case-by-case basis retain the authority to direct that the written report must be submitted within five days instead of the fifteen days).

CWMNW also requires the facility to follow corporate internal notification procedures. If a release occurs, a report similar to the one required by the Oregon and Federal agencies must be submitted to the corporate offices. The reported information is also incorporated in the operation record.

9.1 Contingency Plan Implementation

The following procedures will be observed for reporting and notification for an incident that resulted in the implementation of the Contingency Plan:

9.1.1 Report incident to local authorities and request emergency support, if needed.

Oregon State Police	541-296-2161 or 911
Arlington Fire Department	541-454-2900 or 911

9.1.2 Give the Following Information to All Notified Agencies and Authorities:

- Name and telephone number
- Name and address of facility
- Time and type of incident (e.g., discharge, fire)
- Name and quantity of material(s) involved, to the extent known
- Extent of injuries, if any
- Possible hazards to the environment and human health outside the facility

9.1.2.1 Report the Incident Verbally to:

- National Response Center (800/424-8802), and
- Oregon Emergency Management Division (800/452-0311), immediately.
 - Give the same information specified in 9.1.2 above.

9.1.2.2 Within 24 hours of the Incident

- make a verbal report to the Manager or
- Inspector at DEQ (541) 298-7255. ‡ **Rev. 7**
 - Give the same information specified in 9.1.2 above.

9.1.2.3 Report the Incident to

- CWM/CWMNW regional offices verbally at the time of the incident and
- submit a complete incident report form after the situation is controlled.

9.1.3 Prior to Resumption of Operations and After Cleanup Provide:

- Notification that no waste that may be incompatible with the released material was treated, stored, or disposed of until cleanup procedures were completed, and
- Notification to DEQ to inform that cleanup has been completed and emergency equipment is again ready for use .

- The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the *Contingency Plan*.

9.1.4 Within Fifteen Calendar Days of the Incident

(Unless the Manager or Administrator direct that the written report must be submitted within five calendar days) a written report must be submitted to the Manager and Administrator containing:

- Name, address, and telephone number of the owner or operator,
- Name address, and telephone number of the facility,
- A description of the incident and its cause,
- The exact time and date of the incident,
- Extent of injuries, if any,
- Name and quantities of material(s) involved,
- An assessment of actual or potential hazards to human health or the environment, where this is applicable,
- Estimated quantity and disposition of recovered material that resulted from the incident,
- The anticipated time it is expected to correct the incident if not already corrected,
- Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the incident, and
- Any changes required in the *Contingency Plan*.

9.1.5 Sudden Drop in the Liquid Level of an Impoundment

When the incident involves a sudden drop in liquid level of an impoundment and the drop is not known to be caused by changes in the flows into or out of the impoundment or a leaking dike, provide an incident report to the Manager and the EPA Regional Administrator within seven days after detecting the problem.

9.2 Reportable Quantity under Federal and Oregon Law

The following procedures will be observed for reporting and notification for an incident that has not caused implementation of the *Contingency Plan*, but there is:

- A release into the environment of a reportable quantity of a hazardous substance under federal law,
- A spill or release or a threatened spill or release into the environment of oil or hazardous material that exceeds a reportable quantity under Oregon law, or
- A release or discharge or a hazardous waste that might threaten human health or the environment outside the facility (federal law) or inside or outside the facility (Oregon law).

9.2.1 Report the Incident verbally

As soon as possible but no later than within 24 hours of the incident to:

- the National Response Center (800/424-8802) for:
 - A release into the environment of a reportable quantity of a hazardous substance, or

- A release or discharge of a hazardous waste that might threaten human health or the environment outside the facility
- The Oregon Emergency Management Division, (800/452-0311) for:
 - A spill or release or a threatened spill or release into the environment that exceeds a reportable quantity of oil or a hazardous material, or
 - A release or discharge of a hazardous waste that might threaten human health or the environment outside the facility or inside the facility.

Give the following information to all notified agencies and authorities:

- Name and telephone number
- Name and address of facility
- Time and type of incident (e.g., discharge, fire)
- Name and quantity of material(s) involved, to the extent known
- Extent of injuries, if any
- Possible hazards to the environment and human health outside the facility

9.2.2 Within 24 Hours of the Incident

Make a verbal report to the Manager or Inspector at DEQ (541) 298-7255 † **Rev. 7** for:

- a spill or release or threatened spill or release into the environment that exceeds a reportable quantity of oil or a hazardous material, or
- a release or discharge of hazardous waste that might threaten human health or the environment

Give the same information specified in 9.2.1 above.

9.2.3 Report the Incident

Report the incident to CWM/CWMNW regional offices verbally at the time of the incident is known and submit a complete incident report form after the situation is controlled.

9.2.4 Submit a Written Report

Submit a written report within fifteen calendar days of the incident (unless the Manager or the Administrator directs that the written report must be submitted within five calendar days) to:

- the Manager for:
 - a spill or release or a threatened spill or release into the environment that exceeds a reportable quantity of oil or a hazardous material, or
 - a release or discharge of a hazardous waste that might threaten human health or the environment outside the facility or inside the facility.
- the Regional Administrator for:
 - a release into the environment of a reportable quantity of a hazardous substance, or
 - a release or discharge of a hazardous waste that might threaten human health or the environment outside the facility.

The written report shall contain a description of the incident and its cause, the exact times and dates of the incident, the anticipated time **‡ Rev. 5** expected to correct the incident if not already corrected, and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the incident.

9.3 Exceptions

A spill or release or a threatened spill or release of a reportable quantity of a hazardous substance, a hazardous material or an oil is not required to be reported for the following situations:

- A spill or release or a threatened spill or release of a reportable quantity into secondary containment areas where a release of a reportable quantity of the substance does not migrate into the environment via the ground, air, or water. Mere exposure of the substance to the environment in an enclosed containment structure does not constitute a release.
- The spill or release or threatened spill or release occurs on public or private property and is known to the person owning or having control over the hazardous substance, hazardous material, or oil; or the spill or release occurs on a surface impervious to the material spilled or released and it is fully contained; and it is completely cleaned up without further incident, including fixing or repairing the cause of the spill or release.
- The spill or release or threatened spill or release occurs in a storage unit area, landfill unit or the stabilization unit including the liner for the stabilization unit and a reportable quantity of the substance does not migrate into the environment outside the unit via the ground, air, or water.

10 AMENDMENTS TO THE CONTINGENCY PLAN

This *Contingency Plan* is subject to review and amendment if:

- The plan fails in an emergency
- The facility's permit is revised
- The facility changes in design, construction, operation, maintenance, or if other circumstances develop that materially increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in any emergency
- The list of Emergency Coordinators changes
- The list of emergency equipment changes substantially

When the *Contingency Plan* is amended for any reason, each area amended is reviewed and discussed with all cognizant agencies or emergency response authorities. It should be noted that bullet items 4 and 5 above constitute Class 1 permit modifications. Whenever a revised *Contingency Plan* has received agency approval, a new document is distributed to local, state, and Federal agencies, and to facility personnel responsible for its implementation.

APPENDIX A
WASTE FACILITY INVENTORY

TABLE A-2

TABLE A-2 ‡ Rev. 6

**LOCATION OF RCRA DISPOSAL/TREATMENT AREAS
AND WASTE TYPES PRESENT**

The following is a list of waste types contained in existing areas.

Location ²	Waste Present
-----------------------	---------------

SURFACE IMPOUNDMENTS

(ponds)

The waste impoundments receive pumpable wastes and sludges.

P-A Aqueous waste with pH greater than two, TCLP wastes and metals less than California List limits, caustics

P-B Aqueous waste with pH greater than two, TCLP wastes and metals less than California List limits, caustics

CONTAINER STORAGE AREAS

S-2 Various containerized liquids and solids are stored in segregated sections of this area. Site records must be consulted for specifics as inventory turnover is high.

S-5/S-6 Various containerized liquids and solids are stored in segregated sections of these areas. Site records must be consulted for specifics as inventory turnover is high.

S-4 Various containerized solids are stored in segregated sections of this area. Site records must be consulted for specifics as inventory turnover is high.

S-10 Various containerized liquids and solids are stored in segregated sections of this area. Site records must be consulted for specifics as inventory turnover is high.

S-11A Various containerized liquids and solids are stored in segregated sections of these areas. Site records must be consulted for specifics as inventory turnover is high.

² See Figure 1-1

**TABLE A-2
(Continued)**

Location	Waste Present
LANDFILLS	<p>Stabilized pond residues, contaminated soil, stabilized liquids and sludges, bulk solids, and containerized solids are disposed of in the landfills. The following is a list of waste types deposited in active landfill cells.</p> <p>Potliner</p> <p>Solid waste that may be any of the following:</p> <ul style="list-style-type: none">- corrosive- spent halogenated solvents- spent non-halogenated solvents- electroplating wastes- wood products wastes- petroleum refining wastes- primary and secondary metals waste- pesticide wastes- commercial chemical products- off-specification species- spill residues- There also may be small quantities of liquids present in "lab packs."
STABILIZATION UNIT	<p><u>All Bins</u></p> <ul style="list-style-type: none">- Electroplating sludges- Liquids with pH greater than 2 and metals greater than the California List limits- Electric arc furnace dust- Inorganic liquids or solids- Off-spec materials requiring stabilization- Non-regulated liquids- Liquids with pH greater than 2 with characteristic regulated constituents- Soils and solids with characteristic regulated constituents- Potliner (K088) and various reagents
WASTEWATER TREATMENT UNIT	<ul style="list-style-type: none">- Landfill Leachate - F039- Acid and Alkaline wastewaters- Wastewaters contaminated with heavy, medium, and/or light petroleum distillate- Heavy metal contaminated wastewater- Cyanide contaminated wastewater

TABLE A-2

(Continued)

Location	Waste Present
----------	---------------

WASTEWATER TREATMENT UNIT (continued)

- Organic solvent contaminated wastewater
- ORU wastewaters and process waters
- Various Reagents
- Sodium Hydroxide
- Acids (HCL, H₂SO₄)
- Ferric Sulfate
- Ferric Chloride
- Sodium Hypochlorite/Calcium Hyperchlorite
- Calcium Carbonate
- Hydrogen Peroxide

90 DAY ACCUMULATION AREAS/SATELLITE ACCUMULATION AREAS

- Flammable Liquids
- Corrosive Liquids
- Various containerized liquids and solids from well drilling operations
- Various containerized liquids and solids from maintenance buildings
- Various containerized liquids and solids from lab analysis

CONTAINMENT BUILDINGS

Potliner Soils or other waste materials contaminated with:

- Petroleum hydrocarbons
- Residuals from explosives
- Chlorinated pesticides
- Organic compounds

CRUSHING FACILITY

- Potliner (K088)

ORGANIC RECOVERY UNIT

Organic Contaminated Wastes

- Petroleum refinery waste
- Pesticide contaminated waste
- Other organic wastes

APPENDIX B – PROCESS SPECIFIC CONTAINMENT AND CONTROL PROCEDURES

B1 RCRA CONTAINER STORAGE OPERATIONS (EXISTING)

Prior to treatment or landfilling, drummed wastes will be stored temporarily to allow time for accumulation. RCRA waste container storage areas (various locations) are provided on-site for this purpose, as shown on Figure 1-1.

General safety and operating procedures for the container storage areas are described in the *Container Storage Design and Operations Plan*.

In the event of an emergency (i.e., one of the response criteria given below occurs), the necessary emergency response procedures will be implemented.

B1.1 RESPONSE CRITERIA

The response criteria are the events that trigger response procedures as follows:

B1.1.1 Fire or Explosion

- Fire in the area or an adjacent or nearby area
- Drum disfiguration due to pressure buildup
- Drum explosion or rupture.

B1.1.2 Spill or Material Release

- Leaking or structurally damaged drum
- Gaseous emission or noticeable odors from any container
- Pools of standing liquid.

B1.2 RESPONSE PROCEDURES

The response procedures described in the main body of this *Contingency Plan* will be followed in addition to the specific response procedures detailed below:

B1.2.1 Fire or Explosion

- The person discovering the incident will alert those who are endangered and call for backup support.
- The response personnel will be equipped with fire and/or chemical-resistant clothing plus self-contained breathing apparatus.
- Each facility will have several ABC-type fire extinguishers available to fight small fires (e.g., less than 20 square feet). Appropriate fire equipment will be utilized as determined by the Emergency Response Team Commander.
- In some cases, adjacent exposed containers will be cooled with water; however, water spray will be used only if absolutely necessary in some areas because of the potential for reactions between the stored wastes and the water.

B1.2.2 Spill or Material Release

- The person discovering the incident will alert those who are endangered and call for backup support.
- All response personnel will wear chemical-resistant clothing, face shields, goggles, and respirator or SCBA, as necessary.
- If possible, a temporary patch or plug will be applied to the leaking drum(s) so as to allow the leaking drum(s) to be moved and isolated. The leaking drum(s) then will be over-packed or the contents will be transferred to a sound drum as soon as possible.
- Small spills (i.e., less than 55 gallons) will be contained and mopped up. Larger spills may require the use of a vacuum truck.
- Cleanup residues will be collected for later stabilization and disposal, incineration, or recovery.
- Finally, all response equipment will be decontaminated, restocked, and rechecked.

B2 BULK LIQUID STORAGE/TREATMENT (EXISTING)

General safety and operating procedures for the bulk liquid storage tanks are described in the *Bulk Liquid Storage/Treatment Plan*. In the event of an emergency (i.e. one of the response criteria given below occurs), the necessary emergency procedures will be implemented.

B2.1 RESPONSE CRITERIA

Response actions will be taken should one of the following incidents occur:

B2.1.1 Fire or Explosion

- Fire in tank storage area
- Leak or gaseous emission from storage tanks
- Heat buildup in tanks (e.g., discoloration of any tank)
- Tank disfiguration due to pressure buildup
- Vehicle fire with explosive potential.

B2.1.2 Spill or Material Release

- Tank leak in containment area
- Rupture or leak in piping, valves, or connections.

B2.2 RESPONSE PROCEDURES

The response procedures described in the main body of this *Contingency Plan* will be followed in addition to the special response procedures listed below:

B2.2.1 Fire or Explosion

- The person discovering the incident will alert others who might be in danger and call for backup support.

- All response personnel will be equipped with protective clothing and SCBA, as necessary.
- Response personnel or individuals discovering the incident will shut down feed pumps or shut off electrical service.
- Appropriate fire equipment will be utilized as determined by the Fire Rescue Team Chief. In some cases, use of water spray will be provided by on-site water trucks or nearby hydrants to cool the tanks and "knock-down" vapors. Use of water directly on liquids will be avoided.
- If necessary, inert materials such as soil, or solidification reagents, may be used to isolate or segregate firefighting or explosion residues within a containment area, particularly if there is any potential for mixing of incompatible residues, wastes, or materials.

B2.2.2 Spill or Material Release

- As above, endangered persons will be alerted and backup support acquired.
- Response personnel (2 minimum) with appropriate protective clothing will shut down feed systems, close valves, and turn off pumps. Internal bypass in feed pumps and bypass between tanks will be used as necessary in the process.
- The containment area is capable of retaining the contents of the largest tank. However, if the spill somehow escapes from the containment area, temporary containment berms will be constructed. Liquids will be contained in the smallest area possible.
- In some cases, absorbent or clean soil will be used to cover or isolate the spill, particularly if there is any potential for mixing of incompatible residues, wastes, or materials.
- Contained liquids must be analyzed prior to removal via vacuum truck

B3 STABILIZATION OPERATIONS

The Stabilization Unit has been designed to accommodate a wide range of types and compositions of sludges, semi-solids, and aqueous waste streams. Pre-acceptance and post-acceptance laboratory procedures ensure that no wastes will be accepted for stabilization unless they are determined to be compatible with tank materials of construction and wastes already stored therein.

The stabilization unit consists of twelve carbon steel bins or tanks that are open to the atmosphere. Each tank has a capacity of approximately 15,000 gallons. The tanks are situated partially below the surface of the ground. The steel bins are placed together in pairs that are separated by a dividing wall constructed of concrete and steel I-beams. The tanks are situated partially below the surface of the ground. The steel bins are placed together in pairs. Each pair of tanks is surrounded by a 12-inch thick concrete vault that provides secondary containment and is situated over an HDPE liner.

The southwest corner of the stabilization area is used for containerized product storage for use at the Stabilization Bins. Corrosive liquids in totes and sacked reagents are commonly found in the area. Large pits on the east side of the area are used for storage of bulk reagents such as fly ash and cement.

General safety and operating procedures for the stabilization operations are described in the *Stabilization/Chemical Treatment Plan*. In the event of an emergency (i.e. one of the response criteria given below occurs), the necessary emergency procedures will be implemented.

B3.1 RESPONSE CRITERIA

Response actions will be taken if one of the following incidents occurs:

B3.1.1 Fire or Explosion

- Fire in the processing area or nearby area
- Leak or gaseous emission from treatment or reagent tank.

B3.1.2 Spill or Material Release

- Structural damage to the steel
- Liquid accumulation in containment sump
- Spill in loading/unloading area.

B3.2 RESPONSE PROCEDURES

The standard response procedures described in the main body of the *Contingency Plan* will be followed in addition to the special response procedures listed below:

B3.2.1 Fire or Explosion

- The person discovering the incident will alert others who could be in danger and call for backup support.
- All response personnel will be equipped with fire-resistant clothing and SCBA unit.
- If necessary, response personnel or the individual discovering the incident will shut valves to stop reagent or liquid waste feed.
- The facility's portable extinguishers will be used only to suppress small (i.e., less than 20 square feet) fires when there is no danger of explosion. Appropriate equipment will be utilized as determined by the Emergency Response Team Commander. Large fires will be contained as best as possible until the local fire department arrives. Water spray provided by on-site water trucks or nearby hydrants may be used to cool containers and "knock-down" vapors. However, using water directly on liquids will be avoided.

B3.2.2 Spill or Material Release

- The person discovering the incident will alert others who could be in danger and call for backup support.
- All response personnel will have proper safety equipment, including SCBA if necessary.
- Small spills (i.e., less than 55 gallons) in the loading/unloading area will be contained and/or absorbed with an appropriate absorbent immediately. The spill residue will be placed in a drum or, if necessary, a vacuum truck will be used. For large spills, response personnel (2 minimum) with appropriate protective clothing will stop the discharge of

waste to the stabilization tanks and discontinue operation.

- Liquids in a leaky stabilization tank will be pumped into a vacuum truck for holding. The leak collection sump will be pumped as dry as practicable.
- If a detected gas emission occurs, all personnel in the area will evacuate upwind until having donned a SCBA unit (if appropriate) . If the EC determines that the reaction generating the vapors can be controlled without risk to the response team, he may direct the response team in such attempts. Such control measures may include cooling the affected area with water or cutting off oxygen by smothering with an innocuous material such as soil.
- Cleanup residues will be treated in the stabilization unit for eventual landfilling.
- All response equipment will be decontaminated, restocked and rechecked.

B4 WASTE IMPOUNDMENTS (EXISTING)

Surface impoundments at the facility are used primarily to manage hazardous wastes by solar evaporation. The impoundments are double lined. The location of existing waste impoundments is shown on Figure 1-1. Liquid wastes are discharged to solar evaporation impoundments directly from tank trucks or other containers, or via hoses from other existing waste impoundments.

General safety and operating procedures, as described in the *Surface Impoundments Design and Operations Plan*, will be followed during all facility operations. In the event of an emergency situation (i.e., one of the response criteria is met), the response procedures will be implemented.

B4.1 RESPONSE CRITERIA

Potential for fire is low due to the nature of the wastes being impounded; however, the following incidents will be considered significant enough to implement response procedures:

B4.1.1 Fire or Explosion

- Fire in surrounding areas
- Uncontrollable heat generation due to treatment procedures
- Vehicle fire with explosive potential.

B4.1.2 Spill or Material Release

- Spill occurring during transfer or offloading activities
- Leaks from impoundment units, transfer piping, pumps, or other equipment
- Significant gaseous emissions from solar evaporation impoundments .

B4.2 RESPONSE PROCEDURES

The standard response procedures described in the main body of the *Contingency Plan* will be followed in addition to the special requirements listed below:

B4.2.1 Fire or Explosion

- The person discovering the incident will alert others who could be in danger and call for backup support.
- All response personnel will be equipped with appropriate protective equipment.
- Fires will be fought with appropriate equipment as determined by the Emergency Response Team Commander.
- Residues from explosions or firefighting will be isolated or segregated by constructing earthen berms, dikes, or excavations. Particular attention will be paid to isolating residues that may be incompatible with other residues, wastes, or materials in the area.

B4.2.2 Spill or Material Release

- As above, endangered personnel will be alerted and backup support obtained.
- All response personnel will be equipped with corrosive-resistant jackets, coveralls, gloves, boots, goggles, and self-contained breathing apparatus.
- At the first sign of any malfunction or leakage, waste discharges to the solar evaporation impoundment will be stopped immediately by manually shutting off the discharge valve on the truck or by shutting off the transfer pump.
- Small spills of liquids (i.e., less than 55 gallons) that do not drain into the impoundment during truck unloading operations will be contained with soil or appropriate absorbent. Small spills of reactive solids wastes will be collected by shovel or other appropriate equipment, placed in a container, and dumped into the treatment impoundment by normal dumping methods.
- Larger liquid spills resulting from loss of entire truckload of liquid during unloading or liner or dike leakage will be collected immediately and contained via excavation of temporary impoundments and earthen berms or dikes.
- Steps will be taken to immediately stop any leakage from the impoundment. The actions taken will depend upon the specific type and source of the leakage, but will generally follow the following procedures:
 - Initial assessment of the origin of the leak
 - evaluation of the condition of the leak source (accessibility, repairability, etc.)
 - determination of the most appropriate containment and leak repair measures based on location, type, and source of the leak
 - mobilization of the required response equipment (e.g., protective gear, heavy construction machinery, and materials required to repair leak)
 - implementation of repairs required to stop the leakage.
 - If the type and source of the leakage is such that it cannot be readily controlled, the liquid level will be lowered to a safe level, or the impoundment will be emptied as appropriate. Addition of liquids to the impoundment will be halted until the unit is repaired. Removal and transfer of liquids to another appropriate impoundment or storage unit will be accomplished using pumps and piping, and, if required, vacuum trucks. The Technical Manager or designee will assess the capacity of the other

on-site impoundments or bulk liquid storage tanks to contain the liquids. The Liquid Waste Compatibility Test will also be conducted to ensure there are no incompatible reactions. The available capacity of the existing impoundments will be used to temporarily store the contents of the damaged impoundment. If it becomes necessary to temporarily encroach on the freeboard limit, EPA and DEQ will be contacted for approval before any action is taken. If there are remaining liquids to be contained after these storage options are employed, the waste will be stabilized and landfilled.

- All impoundments, existing or planned at the site, are constructed below grade. No dikes are incorporated in the design.

B5 LANDFILLS (EXISTING)

The existing landfill areas are illustrated on Figure 1-1. Materials placed in landfills at the facility include bulk and containerized solids, lab packs, other very small containers such as ampules, or containers designed to hold free liquids such as batteries or capacitors, as permitted by EPA under 40 CFR Part 264.314.

The general site operating and safety procedures, as described in the *Landfill Design and Operation Plan*, will apply during all activities associated with landfill operation. Response procedures for fires, explosions, spills, or material releases are presented below. The response procedures and the corresponding response criteria address situations that might occur at any one of the individual landfill units.

B5.1 RESPONSE CRITERIA

The following incidents will be considered significant enough to implement response procedures:

B5.1.1 Fire or Explosion

- Fire or smoldering wastes in the landfill
- Fire in an adjacent or nearby area (e.g., grass fire)
- Occurrence or potential occurrence of explosion in the landfill or adjacent storage or treatment area.

B5.1.2 Spill or Material Release

- Rupture of container prior to placement in the landfill
- Spill of bulk solids prior to placement in the landfill

B5.2 RESPONSE PROCEDURES

The standard response procedures in the main body of the *Contingency Plan* will be followed in addition to the special response procedures listed below:

B5.2.1 Fire or Explosion

- The person discovering the incident will alert others who could be in danger and call for backup support.
- All response personnel will wear appropriate protective clothing and SCBA, depending on the source and nature of the fire.
- ABC-type fire extinguishers available on landfill equipment may be used to fight small fires (i.e., less than 20 square feet) when there is no danger of explosion. Appropriate equipment will be utilized as determined by the Emergency Response Team Commander.
- Cleanup residues will be contained via excavation or berm construction; residues will be disposed of appropriately.

B5.2.2 Spill or Material Release

Because liquids are not being disposed of in the landfills, the probability of a liquid spill is extremely remote. Standard cleanup procedures would be employed.

More probable spills would involve solids spilled from ruptured containers or transport vehicles. Such spills are not a problem within the landfill; standard operating procedures would be used to move the spilled material to an appropriate area of the landfill for final disposal.

Solid wastes spilled on route to or at the edge of the landfill present the most difficulty if the spill occurs when rain is falling. The following procedures will be employed if a spill occurs outside of the landfill.

- As above, endangered personnel will be alerted and backup support obtained.
- All response personnel will wear protective clothing with chemical-resistant gloves, boots, goggles or face shield, and respirator with appropriate cartridge (if necessary).
- Small spills of solid hazardous waste (i.e., less than 7.35 ft³--the capacity of a standard drum) that occur when rain is falling will be removed immediately with shovels and placed in a container for transport to the landfill, where the waste will be combined with other compatible bulk solids or mixed with backfill and landfilled according to standard procedures.
- Large spills of solid hazardous waste (i.e., greater than 7.35 ft³) occurring during precipitation events will be immediately contained by earthen dikes or sandbags or controlled by peripheral excavation of collection ditches.
- Appropriate equipment (front end loader, grader, etc.) will be used to remove the spilled solid hazardous waste and place it in an end dump truck. If the waste has been saturated by precipitation, it will be solidified prior to landfilling. Any water contaminated by the spilled waste will be pumped from the diked area or ditch into a container, vacuum truck, or lined impoundment, depending on the volume involved. The contaminated water will be tested prior to removal by vacuum truck or transferred to a lined impoundment to prevent the mixture of incompatible wastes.
- Large or small spills of solid hazardous wastes during dry weather will be removed with shovels or heavy equipment, depending on the volume, and transferred directly to the landfill for disposal according to standard bulk solids disposal procedures.

B6 WASTEWATER TREATMENT PLANT

B6.1 GENERAL SAFETY AND OPERATING RULES

CWMNW has constructed a plant to treat various wastewaters including the following:

- Heavy and Medium Distillate Contaminated Wastewater
- Light Distillate Contaminated Wastewater
- Heavy Metal Contaminated Wastewater
- Cyanides
- Organic Solvent Contaminated Wastewater
- Leachate
- Process and Wastewaters From the Organic Recovery Unit

The location of the Wastewater Treatment Plant is shown on Figure 1-1.

The treatment is performed so that the treated effluent can meet the treatment standards set forth in 40 CFR 268. The plant and all associated equipment outside are inspected daily by the sites' RCRA inspector. The inspector routinely checks for signs of integrity and any tank or auxiliary equipment deterioration or failure. The operator wears appropriate PPE during operations. Smoking is not allowed in the process area. The operator is equipped with a fixed or cellular telephone and the plant is equipped with a CB radio. The plant is equipped with safety showers, eyewash stations, a spill control kit, and fire extinguishers.

In the event of an emergency (i.e., one of the response criteria given below occurs), the necessary emergency response procedures will be implemented.

B6.2 RESPONSE CRITERIA

The response criteria are the events that trigger response procedures as follows:

B6.2.1 Fire or Explosion

- Fire in the area or an adjacent or nearby area
- Leak or gaseous emission from the plant

B6.2.2 Spill or Material Release

- Structural damage to the steel
- Liquid accumulation in the sump
- Pools of standing liquid

B6.3 RESPONSE PROCEDURES

The response procedures described in the main body of this *Contingency Plan* will be followed in addition to the specific response procedures detailed below:

B6.3.1 Fire or Explosion

- The person discovering the incident will alert those who are endangered and call for backup support.
- The response personnel will be equipped with fire and/or chemical-resistant clothing plus self-contained breathing apparatus.
- Each facility has an ABC-type fire extinguisher available to fight small fires (e.g., less than 20 square feet).
- If necessary, response personnel or the individual discovering the incident will shut valves to stop leachate feed.

B6.3.2 Spill or Material Release

- The person discovering the incident will alert those who are endangered and call for backup support.
- All response personnel will wear chemical-resistant clothing, face shields, goggles, and respirator or SCBA, as necessary.
- If a detected gas emission occurs, all personnel in the area will evacuate upwind until having donned the appropriate PPE. If the EC determined that the reaction generating the vapors can be controlled without risk to the response team, the EC may direct the response team in such attempts. Such control measure may include the cooling of the affected area with water or cutting off oxygen by smothering with an innocuous material.
- Small spills (i.e., less than 55 gallons) will be contained and mopped up. Larger spills may require the use of a vacuum truck.
- Cleanup residues will be collected for later disposal on site or by incineration.
- Finally, all response equipment will be decontaminated, restocked, and rechecked.

B7 RCRA 90 DAY STORAGE AREAS/SATELLITE ACCUMULATION AREAS

Prior to treatment, landfilling, or shipment off-site, drummed waste will be stored temporarily to allow time for accumulation. Several locations throughout the facility serve as 90 day and satellite accumulation storage areas.

B7.1 GENERAL SAFETY AND OPERATING RULES

CWMNW accumulates hazardous waste in containers and ensures incompatible materials are not stored together. A site RCRA inspector inspects the containers regularly for signs of leaking, corrosion, structural damage, etc. The RCRA inspector is equipped with appropriate PPE. Smoking is not allowed in these storage or accumulation areas.

In the event of an emergency (i.e., one of the response criteria given below occurs), the necessary emergency response procedures will be implemented.

B7.2 RESPONSE CRITERIA

The response criteria are the events that trigger response procedures as follows:

B7.2.1 Fire or Explosion

- Fire in the area or an adjacent or nearby area
- Drum disfiguration due to pressure buildup
- Drum explosion or rupture

B7.2.2 Spill or Material Release

- Leaking or structurally damaged drum
- Gaseous emission or noticeable odors from any container
- Pools of standing liquid

B7.3 RESPONSE PROCEDURES

The response procedures described in the main body of this *Contingency Plan* will be followed in addition to the specific response procedures detailed below:

B7.3.1 Fire or Explosion

- The person discovering the incident will alert those who are endangered and call for backup support.
- The response personnel will be equipped with fire and/or chemical-resistant clothing plus self-contained breathing apparatus.
- In some cases, adjacent exposed containers will be cooled with water; however, water spray will be used only if absolutely necessary in some area because of the potential for reactions between the stored wastes and the water.

B7.3.2 Spill or Material Release

- The person discovering the incident will alert those who are endangered and call for backup support.
- All response personnel will wear chemical-resistant clothing, face shields, goggles, and respirator or SCBA, as necessary.
- If a detected gas emission occurs, all personnel in the area will evacuate upwind until having donned the appropriate PPE. If the EC determines that the reaction generating the vapors can be controlled without risk to the response team, the EC may direct the response team in such attempts. Such control measure may include the cooling of the affected area with water or cutting off oxygen by smothering with an innocuous material.
- Small spills (i.e., less than 55 gallons) will be contained and mopped up. Larger spills may require the use of a vacuum truck.
- Cleanup residues will be collected for later disposal on site or by incineration.
- Finally, all response equipment will be decontaminated, restocked and rechecked.

B8 CONTAINMENT BUILDINGS

Prior to treatment or landfilling, wastes may be stored in containment buildings. Locations of the containment buildings are shown on Figure 1-1.

General safety and operating procedures for the containment buildings are as described in the *Containment Buildings Design and Operations Plan*.

In the event of an emergency (i.e., one of the response criteria given below occurs), the necessary emergency response procedures will be implemented.

B8.1 RESPONSE CRITERIA

The response criteria are the events that trigger response procedures as follows:

B8.1.1 Fire or Explosion

- Fire in the area or an adjacent or nearby area
- Emission from building

B8.1.2 Spill or Material Release

- Structural damage to building
- Liquid infiltration into building
- Spill in area

B8.2 RESPONSE PROCEDURES

The response procedures described in the main body of this *Contingency Plan* will be followed in addition to the specific response procedures detailed below:

B8.2.1 Fire or Explosion

- The person discovering the incident will alert those who are endangered and call for backup support.
- The response personnel will be equipped with fire and/or chemical-resistant clothing plus self-contained breathing apparatus.
- Each facility will have several ABC-type fire extinguishers available to fight small fires (e.g., less than 20 square feet). Appropriate fire equipment will be utilized as determined by the fire rescue team chief.
- In some cases, adjacent exposed containers will be cooled with water; however, water spray will be used only if absolutely necessary in some areas because of the potential for reactions between the stored wastes and the water.

B8.2.2 Spill or Material Release

- The person discovering the incident will alert those who are endangered and call for backup support.
- All response personnel will wear chemical-resistant clothing, face shields, goggles, and respirator or SCBA, as necessary.
- Small spills (i.e., less than 55 gallons) will be contained and mopped up. Larger spills may require the use of a vacuum truck.

- Cleanup residues will be collected for later stabilization and disposal, incineration, or recovery.
- Finally, all response equipment will be decontaminated, restocked, and rechecked.

B9 CRUSHING FACILITY (EXISTING)

A facility has been constructed for the size reduction of EPA Hazardous Waste No. K088, Spent Potliner wastes from Primary Aluminum Reduction (“K088”) prior to treatment in the Stabilization Units. The facility may also be used for the size reduction of other wastes in the future as well prior to treatment and/or stabilization. The Crushing Facility is housed in a separate building constructed as an extension of Containment Building B-1 situated on the west side of the building (Figure 1-1).

The size reduction of K088, or other wastes is carried out in two stages. The first stage is a jaw crusher located inside Containment Building B-1 along the west wall that reduces the average size of waste aggregates to approximately 6 inches or less. The output from the jaw crusher is then transferred by a conveyor belt for further size reduction to an impact crusher located in the crushing facility. The impact crusher reduces the average size of the waste aggregates to approximately 1½ inches.

General safety and operating procedures for the Crushing Facility is described in the *Containment Buildings Design and Operations Plan*. In the event of an emergency (i.e. one of the response criteria given below occurs), the necessary emergency procedures will be implemented.

B9.1 RESPONSE CRITERIA

Response actions will be taken should one of the following incidents occur:

B9.1.1 Fire or Explosion

- Fire in the area or an adjacent or nearby area
- Emission from the building

B9.1.2 Spill or Material Release

- Structural damage to building
- Liquid infiltration into building
- Spill in area

B9.2 RESPONSE PROCEDURES

The response procedures described in the main body of this *Contingency Plan* will be followed in addition to the special response procedures detailed below:

B9.2.1 Fire or Explosion

- The person discovering the incident will alert others who might be in danger and call for backup support.

- All response personnel will be equipped with fire and/or chemical-resistant protective clothing plus self-contained breathing apparatus.
- The facility will have ABC-type fire extinguishers available to fight small fires (e.g., less than 20 square feet). Appropriate fire equipment will be utilized as determined by the Emergency Response Team Commander or individuals discovering the incident will shut down all machinery pertaining to the crushing operation, if feasible, or shut off electrical service.
- If necessary, inert materials such as soil, or solidification reagents, may be used to isolate or segregate firefighting or explosion residues within the crushing facility. Water spray will be used only if absolutely necessary in some areas because of the potential for reactions between any waste residue and water.

B9.2.2 Spill or Material Release

- The person discovering the incident will alert those who are endangered and call for backup support.
- All response personnel will wear chemical-resistant clothing, face shields, goggles, and respirator or SCBA, as necessary.
- Small spills (i.e. less than 55 gallons) will be contained and mopped up. Larger spills may require the use of a vacuum truck.
- Cleanup residues will be collected for later stabilization and disposal on-site, incineration, or recovery.
- Finally, all response equipment will be decontaminated, restocked, and rechecked.

B10 ORGANIC RECOVERY UNIT (ORU) and ASSOCIATED OPERATIONS IN B5

The ORU has been designed to treat organic constituents in sludges, pesticide contaminated waste, oil refinery wastes and other organic based contaminated waste. Pre-acceptance and post-acceptance laboratory procedures ensure that no wastes will be accepted unless they are compatible with tank materials and wastes at the facility.

The ORU consists of a rotary kiln, a condensing unit and tankage for process water and oil storage, waste to be treated at the ORU is staged inside the B5 containment building. B5 is underlain by two HDPE liners. The ORU is entirely contained within concrete containment meeting the requirements of 40 CFR Subpart J.

General safety and operating procedures for the ORU are described in the *Bioremediation Facility and Organic Recovery Unit Design and Operations Plan*. In the event of an emergency (i.e. one of the response criteria given below occurs), the necessary emergency procedures will be implemented.

B10.1 RESPONSE CRITERIA

Response actions will be taken if one of the following incidents occurs:

B10.1.1 Fire or Explosion

- Fire in the processing area or in B5
- Leak or gaseous emission from ORU or storage tank.

B10.1.2 Spill or Material Release

- Structural damage to the steel
- Liquid accumulation in containment sump
- Leak or rupture of a liquids storage tank
- Spill in loading/unloading area.

B10.2 RESPONSE PROCEDURES

The standard response procedures described in the main body of the *Contingency Plan* will be followed in addition to the special response procedures listed below:

B10.2.1 Fire or Explosion

- The person discovering the incident will alert others who could be in danger and call for backup support.
- All response personnel will be equipped with fire-resistant clothing and SCBA unit.
- For all fires or explosions endangering plant operations, operators will begin the process of shutting down the rotary kiln.
- The facility's portable extinguishers will be used only to suppress small (i.e., less than 20 square feet) fires when there is no danger of explosion. Appropriate equipment will be utilized as determined by the Emergency Response Team Commander. Large fires will be contained as best as possible until the local fire department arrives. Water spray provided by on-site water trucks or nearby hydrants may be used to cool hot spots and "knock-down" vapors. However, using water directly on liquids will be avoided.

B10.2.2 Spill or Material Release

- The person discovering the incident will alert others who could be in danger and call for backup support.
- All response personnel will have proper safety equipment, including SCBA if necessary.
- Small spills (i.e., less than 55 gallons) will be contained and/or absorbed with an appropriate absorbent immediately. The spill residue will be placed in a drum or, if necessary, a vacuum truck will be used. For large spills, response personnel (2 minimum) with appropriate protective clothing will stop the discharge of waste and discontinue operation.
- Liquids in a containment area will be pumped into a vacuum truck for holding. The leak collection sumps will be pumped as dry as practicable.
- If a detected gas emission occurs, all personnel in the area will evacuate upwind until having donned a SCBA unit (if appropriate). If the EC determines that the reaction generating the vapors can be controlled without risk to the response team, he may direct

the response team in such attempts. Such control measures may include cooling the affected area with water or cutting off oxygen by smothering with an innocuous material such as soil.

- Cleanup residues will be returned to appropriate piles inside B5 or sent to the WWTU for treatment.
- All response equipment will be decontaminated, restocked and rechecked.