

VOLUME 1 CHAPTER 6

6.0 SPILL PREVENTION AND RESPONSE PLAN

6.1 General

6.1.1 Purpose

The purpose of this Spill Prevention and Response (SPR) Plan is to identify hazardous substances in use at this facility and to identify potential sources of spills, establish measures of prevention, control, and cleanup for the Idaho Falls Hazardous Waste Management Facility (HWMF), which is located between 20th and 23rd Streets and South Yellowstone and Leslie Avenue, Idaho Falls, Bonneville County, Idaho.

Responsibility for compliance with this plan lies with the HWMF Manager or other responsible company official who has signed this plan for company management.

6.1.1.1. Legal Reference

Preparation of this plan generally follows the requirements of Section 311, Oil and Hazardous Substance Liability of the Federal Water Pollution Control Act (public Law 92-500 as amended). The current waste water treatment facility is exempt from the Section 311 requirements as noted in the code of federal regulations 40 CFR Part 112.1 (d) (6). Despite this exemption, a spill prevention and response plan has been prepared as a pollution prevention measure to minimize the likelihood of occurrence and the potential impacts of a sudden release of groundwater from the treatment plant or a spill of spent granular activated carbon (GAC).

6.1.1.2. Scope

Creosote was formerly used and stored at the Idaho Falls Pole Yard. All creosote has been removed. CERCLA has redefined "Spill" of hazardous materials, as defined below, as a "Release". The term "Spill" has been retained herein in most instances to agree with common usage at PacifiCorp.

6.1.1.3. Definition of Reportable Spill (Release)

A legally reportable "oil spill" is any spillage, leakage, discharge or disposal of oil, grease, or other petroleum product that enters or is threatening to enter any waterway. A "waterway" includes any river, stream, canal, lake, sewer, drain, or pond. Further definition is given in 40 CFR, 112.2(a).

A legally reportable spill of a hazardous material such as creosote contaminated water is defined as an unplanned sudden or non-sudden release of a reportable quantity of a hazardous waste constituent to air, soil, or surface water. The reportable quantity for creosote is one pound. If the total dissolved PAHs concentration coming into the treatment plant were 10 milligrams per liter then it would take a release of approximately 12,000 gallons of untreated groundwater to represent a reportable release.

6.1.2 Description of Facility

6.1.2.1. General

The Idaho Falls HWMF is located between 20th and 23rd Streets and South Yellowstone and Leslie Avenues, Idaho Falls, Bonneville County, Idaho. The area is industrial with drainage to the east within the yard as shown in Figure 2.16.

6.1.2.2. Potential Source of Spills

Creosote-contaminated spent extraction media includes spent granular activated carbon (GAC), which may be contained onsite temporarily awaiting shipment to disposal facilities.

Creosote-contaminated groundwater continuously flows through the Treatment Facility during the removal of contaminants by GAC adsorbers. The contaminated groundwater represents by definition a hazardous material because it contains a hazardous material. The potential for a spill from the treatment system such as a piping flange leak is

addressed by methods of spill containment. The facility design provides for the direction of spills onto the floor into containment with pumps.

6.1.3 Prevention and Control of Spills

Prevention measures are centered on proper design, inspection, and maintenance of groundwater treatment equipment. The treatment system, groundwater extraction wells, and water collection piping are inspected regularly for leaks. Data are entered into the logbook or on to site forms for each inspection. Automated leak detection systems are to be installed at the site in 2009 which will monitor the system and immediately notify the appropriate response personnel if a leak is detected. The water treatment building is designed to capture leakage from the water treatment equipment separately in the two rooms of the building. Leakage is directed by the sloped floors to concrete structures, i.e. the floor sump in one room and the wet well in the other room. Sensors designated as high level alarms are provided inside each structure. Each of the facility's rooms will have leak detection cables that sense wastewater on the floor. Either method of leak detection, high level switches or distributed cable sensors will invoke an emergency shutdown of the system with notification of the operator.

The 2009 system automation will upgrade record keeping with computerized data acquisition. The SCADA computer will log the leak detection event and the emergency shutdown will stop all extraction well pumps and close the automated valve on the pre-treatment clarifier outlet piping to the wet well. The inspection of leak detection sensors is included on Form 6.1 and Form 6.4.

Emergency response personnel shall be under contract should conditions arise that require these services. Contractors that will be used during an emergency spill are discussed in Volume I Chapter 5 Section 5.5.2.3 of this report. Any necessary response will be commenced immediately. If leaks do occur, they are to be immediately cleaned up as part of the regular operation procedure. Spent cleanup material, gravel, soil and other cleanup debris would be characterized and disposed of in accordance with federal and state hazardous waste regulations (40 CFR Part 262 and applicable state regulations).

6.1.3.1. Training of Personnel

In order to reduce the number of human errors that cause spills or releases of hazardous materials, employees must be adequately trained as described in Volume I Chapter 7 of this permit reapplication.

Other personnel who are assigned to cleanup crews must have received training in these practices.

6.1.3.2. Exposure Prevention Practices

Only personnel trained in emergency oil and hazardous material containment and cleanup procedures and protected against the attendant hazards shall shut off sources of release, control and repair leaks, clean up spills, and fight fires in areas where oil or hazardous material is used.

Personnel entering the spill or leak area shall be furnished with appropriate personal protective equipment and clothing. All other personnel and the public shall be evacuated from and prohibited from entering the area.

In case of skin contact with oil or creosote-contaminated groundwater, wash the area of contact with soap and water. If soap and water are not immediately available, clean the area of contact thoroughly with waterless hand cleaner. Clean and dry the area thoroughly and then repeat the cleansing. Shower as quickly as possible.

In case of oil or creosote-contaminated groundwater contact with eyes, the eyes should be irrigated as soon as possible with copious quantities of running water for at least 15 minutes. Seek immediate medical attention.

The area of a leak or spill shall be adequately ventilated to prevent the accumulation of vapors.

Any facility that contains oil or hazardous materials must have on hand a spill cleanup kits as described in Table 5.2. The Idaho Falls HWMF spill kits are stored in the treatment building.

6.1.3.3. Security Policies

The Idaho Falls HWMF has a chain link security fence with locked gates to limit access when site personnel are not present (see Figure 2.16). When any gates are unlocked for any reason, the HWMF Manager/Emergency Coordinator must assure that no unauthorized persons enter into the yard. The emergency response contractors, police, and fire departments shall also have the code required to open the gate should a rapid response be required.

Warning signs that are visible from 25 feet and that can be seen from any approach have been installed and will be maintained.

6.1.3.4. Asphalt, Gravel and Berm

The entire HWMF ground surface is covered with asphalt and gravel. The berms inside the water treatment building that surround the water treatment equipment direct contaminated groundwater spills to the two basins located in two separate facility rooms, the floor sump and the wet well. Groundwater or floor washdown will be pumped from the floor sump to the treatment system inlet and will be pumped from the wet well as usual into the GAC adsorbers. In either case the captured water is treated for contaminant removal. Automatic alarms occur if the floor sump fills with water or if the wet well receives water off the floor. A level switch in the floor sump and a detection strip around the wet well provide leak detection signals to the SCADA computer. After a leak detection system is alarmed, the computer sequence of operation will stop incoming flow from the well pumps and notify the operators with the autodialer.

6.1.3.5. Operation and Maintenance

Equipment and prevention apparatus such as gaskets, pumps, valves, fittings, and dikes will be maintained and operated in a manner that will prevent failures, leaks, spills, or other incidents that could result in the release of oil or contaminated groundwater from the equipment or apparatus.

If a leak is observed during weekly manual inspections or after responding to an alarm condition the operator shall respond as follows:

- Oil leaks in small amounts which are detected during the operator's weekly facility inspections will be addressed with drip or catch pans, temporary berms, and oil absorbing blankets and booms as a temporary measure.
- Small contaminated groundwater leaks which are detected during the operator's weekly facility inspections will be addressed with drip or catch pans, temporary berms, and water absorbing blankets. If standing water occurs, it will be transferred using a wet vacuum into the floor sump. Leaks from piping shall be addressed only after depressurizing the system and only by qualified workers.
- Large contaminated groundwater leaks will be directed by the slope of the facility floor into concrete basins, the floor sump or the wet well. There are four alarming leak detection devices that will shutdown the system and notify the operator:
 - The floor sump level switch high level alarm.
 - The wet well level transmitter high level alarm.
 - The wet well level switch high level alarm.
 - The wet well leak detection strip alarm.

When responding to a shutdown alarm, contaminated groundwater leaks found in the

floor sump or wet well get recycled to the water treatment system inlet following the operator's response to an alarm. Leaks from piping shall be addressed only after depressurizing the system and only by qualified workers.

Repair of the leak will begin immediately. The waste will be characterized, and then treated in the system or appropriately disposed of and equipment decontaminated.

All leaks shall be recorded in the operations logbook.

6.1.3.6. Transportation Procedures

Each transport vehicle carrying hazardous materials or wastes will be marked on each end and side with the appropriate placards. When the vehicles are unloaded, the placards will be removed.

Every truck which is regularly assigned to transport spent granular activated carbon or contaminated groundwater to a disposal, regeneration, or storage facility will be equipped with a cleanup kit as described in Section 6.1.4 and shown in Table 5.2. The general response to a creosote spill during transportation is outlined in Table 6.1. All personnel who are involved in the transportation of spent granular activated carbon or contaminated groundwater will receive instructions in safe handling procedures, proper transportation procedures, and spill cleanup procedures for any contingency.

The following procedures must be observed for all loading, unloading, and transporting operations:

1. Establish quick and easy lines of communication with the Emergency Coordinator and the on-site Environmental Coordinator for all those involved in loading/unloading for transportation.
2. Load/unload vehicles in an area removed from storm drains or storm sewers.
3. Assure that a manifest and/or record be kept as required of all pickups, transportation, and deliveries.

4. Drivers must be given the list of procedures in Table 6.1 to be taken in case of emergency.

6.1.4 Countermeasures

The berms described above are designed to contain contaminated groundwater leaks, should they occur, and thus mitigate the possibility of the material getting into a watercourse. In the case of small leaks, which are confined to small areas, cleanup is part of the ordinary operating procedure.

If a leak occurs and there is no chance that the impacted groundwater will be leaving company property, only in-house reporting is necessary, but countermeasures and cleanup must proceed as outlined in the Sections 6.1.4.1 and 6.1.4.2 below.

Direct Countermeasures described in Section 6.1.4.1 below are to be taken immediately when there is any danger of hazardous material entering any waterway, infiltrating into the ground, or any large release.

6.1.4.1. Direct Countermeasures

In the case of a spill or release, the following direct countermeasure actions to terminate the source of flow of the material will be used as necessary:

- Verify that the SCADA computer provided a leak detection alarm in combination with the autodialer notification.
- Verify that the SCADA computer shutdown the extraction well pumps and shut the pre-treatment clarifier discharge valve.
- Manually or remotely turn off the extraction well and wet well pumps as required
- Verify that either the floor sump has filled with water or that the wet well has filled too high or received water off of the floor.

- Make sure the spill is totally contained
- Plug the leak;
- Build berms or dikes;
- Get outside help if necessary.

If hazardous material has already left company property, efforts must be made to place appropriate booms and absorbent materials in watercourses or drains or take other actions necessary to minimize environmental damage as a result of the spill.

The person discovering the spill or the SCADA computer alarm system will notify the HWMF Manager or other contact as indicated in Table 5.1. If a person detects a spill, they shall, at their earliest convenience, record the following information:

1. Location of the spill, including type of terrain and nearest waters or drains and anticipated movement of spilled material.
2. Time the spill was first observed.
3. Existing weather conditions.
4. Device or activity involved when spill occurred.
5. Cause of the spill.
6. Material spilled.
7. Estimated quantity of the spill.
8. When and what action was taken for countermeasures control and cleanup.
9. Effectiveness of cleanup operations.

6.1.4.1.1. Notification

Direct operating responsibility for the Idaho Falls HWMF rests with the HWMF Manager. The HWMF Manager or his designee shall be directly responsible for cleanup

operation. Upon sensing a significant alarm condition the SCADA computer and autodialer will notify the PacifiCorp RMP-NSD (24 hour Call Center) and the Emergency Coordinator immediately. The Emergency Coordinator shall manage all immediate concerns and then communicate with the HWMF Manager to direct cleanup efforts.

When notified, the Emergency Coordinator will communicate with the PacifiCorp RMP-NSD as described Section 6.1.5.1.1 below to initiate the appropriate response. If the Emergency Coordinator in consultation with the HWMF Manager cannot contain the spill, an emergency response contractor and the appropriate governmental entities (generally the police and fire department) will be notified to respond to the incident as described above in Section 6.1.4.2.

The entire cleanup operation will be directed by the HWMF Manager or the designated emergency response contractor. The HWMF Manager or his designated contractor will order a HWMF cleanup crew and necessary cleanup materials and institute additional countermeasures and initial cleanup procedures. As quickly as possible, the HWMF Manager will:

1. Communicate with the Emergency Coordinator and mobilize to the site.
2. Ascertain the severity of the spill.
3. Initiate necessary additional response steps.
4. Decide if the spill is reportable as defined in Section 6.1.1.3. If it is, contact the HWMF Manager of PacifiCorp. If the HWMF Manager cannot be quickly located, notify the System Dispatcher, who will continue to attempt contact.
5. Maintain a log of all telephone calls and actions regarding the spill.
6. Prepare and submit a written report as described in Section 6.1.5.2.1 to the HWMF Manager as soon as possible after the spill.

Included also in this report will be recommendations regarding any measures that could be taken to prevent any future spills.

6.1.4.2. General Cleanup Procedures

Any quantity of hazardous material spilled must be cleaned up immediately. A trained crew will respond immediately upon notification that a spill has occurred.

All cleanup personnel handling hazardous materials and/or engaged in the actual cleanup labor are to wear protective disposable clothing as described in Section 6.1.3.2, Exposure Prevention Practices.

It is extremely important that any hazardous fluid be prevented from reaching streams, storm drains, sewers, drainage ditches, or any other place where water is flowing. The crew is to exercise every available option open to them to contain the spill, which includes temporary diking or diversions. In addition, the crew should anticipate and prevent water from flowing into the contaminated area from sources such as nearby sprinkler systems and/or street gutter and rainwater runoff.

If the spill does reach groundwater, flowing waters, storm sewers, or any inaccessible area or non-PacifiCorp area, the HWMF Manager must immediately be notified directly or through the System Dispatcher in Table 5.1.

A small amount of water and spilled material may be absorbed in sand, sawdust, or commercial absorbents and placed into secure 55-gallon drums; or the water and spilled material may be bailed or pumped into the treatment system. The sediment and sludge from the bottom of the puddle should then be over-excavated to a depth not less than 15 cm, and placed in drums. Contaminated materials would then be characterized and disposed of in compliance with the appropriate state and federal regulations.

Since some components of creosote tend to sink, spills into sizable bodies of water pose a difficult cleanup problem and require special procedures. A vacuum truck may be used, or a contractor with special equipment will be engaged and the advice of State environmental officials will be sought during the response effort.

Secure the area so that members of the public do not come in contact with the spilled fluid. Barricades should be placed as required around the contaminated area to prevent pedestrians and vehicles from entering until the spilled material is cleaned up and removed. For spills on gravel or soil, it may be possible to absorb some of the liquid with absorptive material before removing the gravel or soil. All contaminated gravel or soil must be removed by over-excavation. To verify that creosote contaminated materials have been removed, a photoionization analyzer will be utilized. The analyzer detects the concentration of trace gases which are emitted from creosote-contaminated materials. Contaminated gravel and soil will be excavated and removed until the analyzer does not detect any evidence of creosote vapors (gases), or until visually clean. At this time a representative sample of material at the bottom of the excavation will be taken for chemical analysis of the presence of creosote and cleanup continued until the specified level is reached.

Spills on solid surfaces may be removed with absorptive materials and then cleaned thoroughly with rags wetted with an approved solvent. Approved water-based solvents include but are not limited to Penetone Power Cleaner 155 or Stoddard Solvent. A can of Penetone is also included in each spill kit. It is effective on all surfaces. Stoddard Solvent also may be used for most cleanup operations, although it will damage asphalt. Care should be taken to avoid breathing fumes of these solvents. A wipe sample of the cleaned surface will be taken for chemical analysis of the presence of creosote.

Company or private vehicles that have been wetted with hazardous materials should also be carefully cleaned with rags and Stoddard Solvent or Power Cleaner 155 and a wipe sample taken and tested as above to assure complete decontamination. For each private vehicle involved, fill out a written record. Record the general condition of the vehicle prior to cleaning and after cleaning, including any damage that may have been caused by utility equipment. This will provide an identification record of private vehicles cleaned for future reference in case a damage claim is filed. Claim forms and return envelopes are to be placed in a weatherproof envelope and left in a secure place where the owner will see it when returning to his/her vehicle. All such instances must be noted in the report to the HWMF Manager per Sections 6.1.5.1.1 and Section 6.1.5.1.2.

Repair all facilities designed for containment purposes should they be damaged during the spill or cleanup operations. Submit recommendations, if any, on preventative measures to prevent or control future spills.

6.1.4.2.1. Decontamination Procedures

All equipment, tools, materials, clothing, etc. used for cleanup of creosote or creosote-contaminated groundwater must be decontaminated or disposed of according to the procedures spelled out herein. All contaminated protective clothing must be placed in sealable drums for disposal as hazardous waste. Contaminated personal clothing must be placed in specially labeled clean drums and the HWMF Manager notified to arrange cleaning by a commercial cleaner or laundry. The cleaning company must be notified of the hazards of the contaminating material.

To decontaminate tools and equipment, wipe down all contaminated surfaces thoroughly with rags wetted with an approved solvent such as Penetone or Stoddard Solvent. This wipedown must be performed three times, each time with clean, fresh solvent. If the items have been exposed to concentrated creosote, wipe tests must then be taken of the surfaces and an analysis made to assure complete decontamination. All solvent, rags, etc. used in decontamination must be disposed of as hazardous material as described herein.

6.1.4.2.2. Outside Contractors

Should PacifiCorp personnel be unable to perform the cleanup operation, and it is necessary for cleanup to be done immediately then refer to the Contingency Plan, Volume I Chapter 5 Section 5.5.2.3 for specific contractor information.

Any potentially hazardous material must be characterized, handled, transported, and disposed of appropriately. If the spill is large, special cleanup efforts such as those provided by the Coast Guard may be necessary. In this case, notify the PacifiCorp Emergency Coordinator in Table 5.1.

6.1.4.3. Hazardous Material Disposal (Creosote)

The HWMF Manager shall be responsible for proper characterization, transportation, and disposal of materials impacted by creosote contaminated groundwater.

6.1.4.3.1. Hazardous Materials Cleanup Checklist

For a copy of the Hazardous Materials Cleanup Checklist see Form 6.2.

6.1.4.4. Cleanup Equipment (Spill Kit)

Each facility, which has hazardous material, must have a spill cleanup kit. The kits are contained in a sealable 55-gallon drum and consist of the items in Table 5.2.

In addition to the spill cleanup kits, the IFPY facility will have on hand additional emergency supplies and equipment as described in Table 5.2.

6.1.5 Reporting

Proper reporting of spills is very critical and must be done carefully, accurately, and in a timely manner.

6.1.5.1. When to Report and When not to Report

As defined in Section 6.1.1.3, a legally-reportable "oil spill" is any spillage, leakage, discharge or disposal of oil, grease or other such petroleum product that enters or is threatening to enter any river, stream, canal, sewer, drain, lake or pond. Any release of a legally-reportable spill in a reportable quantity of hazardous material must be reported. For creosote, the reportable quantity is one pound or approximately 12,000 gallons of creosote impacted groundwater having a total dissolved PAH concentration of 10 micrograms per liter.

6.1.5.1.1. In-house Verbal Reporting

Any personnel discovering leakage or spillage of a hazardous material at the HWMF must notify the HWMF Manager and give the information listed in Section 6.1.4.1.1. The same information shall be recorded in a logbook maintained at the site.

The HWMF Manager will determine if it is a reportable spill or discharge, and if so, will report the event.

As described in Section 6.1.5.1.3 the HWMF Manager will notify officials concerning spills or releases as required.

The HWMF Manager will inform the PacifiCorp Communications Department of all spills and releases, as necessary.

6.1.5.1.2. In-house Written Reporting

For any spill or release not qualifying as a legally reportable spill, a written report must be submitted by the on-site Environmental Technician to the HWMF Manager within five days of the original verbal report. This written report must address the same components described in Section 6.1.4.1.1, Direct Countermeasures Notification, and any additional issues deemed important by operating personnel.

6.1.5.1.3. Reporting to State and Federal Agencies

The HWMF Manager will initiate all reporting to the agencies. The HWMF Manager will:

- Immediately report discharges of hazardous material to the EPA, State, and U. S. Coast Guard National Response Center. Verbal notification to the agencies must be made in accordance with federal regulation 40 CFR Part 302.6 for a legally reportable spill.

- Make necessary written reports to the EPA, State, and National Response Center and other agencies as required.

6.1.5.2. Inspections

Inspections will be made on a weekly basis by the on-site Environmental Technician, recorded on Form 6.1, and the forms reviewed by the HWMF Manager. Weekly reports will include inspection reports and any recommendations for work performed or maintenance. Any recommendations for work to be performed or required maintenance to be done will be addressed immediately by PacifiCorp.

6.1.5.2.1. Records

Records and reports of spills or releases shall be maintained for a period of three years and shall be made available for inspection, upon request, by EPA, or the state of Idaho.

6.2 INSPECTION PLANS AND CHECKLISTS

6.2.1 General

PacifiCorp requires weekly, monthly, and quarterly inspections be conducted by the onsite Environmental Technician or other appropriate personnel at the Idaho Falls HWMF. Volume I Appendix C of this reapplication permit contains Form 6.1, Weekly Inspection, Form 6.3, Monthly Chemical Respirator Checklist, and Form 6.4, Quarterly Inspection Checklist. These forms are to be filled out and copies kept in the HWMF office.

Inspections of all equipment associated with the pumping, transferring, measurement and treatment of the groundwater at the HWMF will be documented using Forms 6.1, 6.4, and a dedicated logbook. The HWMF cover will be visually inspected and the HWMF will also be inspected after 10-year storm events to detect evidence of any deterioration, malfunction or improper operation of run-on and runoff control systems. All emergency equipment and supplies at the facility are checked on a weekly basis to determine that

they are in operating order. A list of required inspections is provided on Table 6.2. The inspection for the perimeter fence will be spot-checked by the onsite Environmental Technician throughout the year. An inspection report must be filed if deterioration is noticed, and immediate action will be taken to rectify problems.

Any necessary repairs or replacement of equipment are to be noted on the inspection sheets and submitted in weekly reports. Repairs, replacements and spill cleanups are conducted as soon as possible, depending upon the availability of replacement parts or heavy machinery for repairing covers.

If specific remedial action is implemented, the inspection procedures and frequency of inspections will be reviewed and updated as necessary.

6.3 SECURITY, TRAFFIC ROUTING, LOADING AND UNLOADING AND PARKING AREAS

6.3.1 Security

The PacifiCorp Hazardous Waste Management Facility (HWMF) is presently surrounded by a 7.8 foot high galvanized steel chain link security fence as shown in Figure 2.16. The steel poles to which the fence is attached are set in concrete. The chain link extends 6.8 feet above the ground and above that are three strands of barbed wire angled away from the site. The fence extends completely around the HWMF site. This security fence is maintained with locked gates to limit access during non-business hours. Table 6.3 and Figure 2.16 show the locations and uses of the various gates at the HWMF.

The onsite Environmental Technician or other onsite personnel are responsible for restricting yard access whenever the main entrance gate is unlocked.

Warning signs have been placed every fifty (50) feet along the perimeter fence so that a sign can be seen and read within twenty-five (25) feet of the fence. These signs read as follows:

CAUTION - HAZARDOUS AREA - AUTHORIZED PERSONNEL ONLY

- The background is yellow.
- "CAUTION" is in yellow letters, 3.0 inches high, on a black background.
- "HAZARDOUS AREA, etc." is in black letters, 2 inches high, on a yellow background.
- The sign dimensions are 14 inches high by 20 inches wide.

Figure 6.1 is a facsimile of the signs used. The signs will be checked regularly and maintained.

PacifiCorp believes that adequate security is being provided for the present operating conditions of the site based on the following considerations:

- The hazardous materials are located inside of the fenced areas.
- All hazardous materials are containerized and sent to the appropriate facilities within the required ninety (90) days or within applicable regulations.

6.3.2 Traffic Routing

The traffic routing within the HWMF is shown in Figure 2.15.

6.3.3 Loading/Unloading

The storage shed identified as the Framing Shed is used for storage of carbon used in the treatment plant and groundwater sampling equipment. Access to the Framing Shed storage is through a roll-up garage door on the south end of the building and a locked man door on the north end.

Roll-up garage doors are found in both west and east ends of the water treatment buildings. These are used as needed for the loading of barrels containing hazardous waste and as chemical and equipment loading and unloading areas.

6.3.4 Parking

No parking is allowed that would hinder daily operations and emergency equipment.

6.3.5 Security Lighting

The water treatment building entrances have security lighting that are motion activated.

TABLE 6.1

IN CASE OF CREOSOTE SPILL DURING TRANSPORTATION

IN CASE OF CREOSOTE SPILL DURING TRANSPORTATION:

1. Catch, contain or confine any leaks or spillage of creosote – make dikes or dams around the area using dirt, gravel, creosote-sorbing materials, rags, or any such material that is available.
2. It is extremely important that creosote be prevented from entering streams, canals, ponds, drainage ditches, storm drains, sewers or any other place where water flows or is stored.
3. Wear protective clothing and eye-protecting goggles.
4. Secure the area so that members of the public do not come into contact with creosote.
5. Dip, scoop, and clean up the creosote spill using absorbent materials as necessary.
6. Place all creosote mixtures and wastes, including contaminated gravel and earth (6 in. deep) in properly labeled and sealed containers.
7. Decontaminate tools and equipment used to clean up creosote by washing with proper solvents, plus storing and handling these contaminated solvents as creosote mixtures.
8. Decontaminate any pavement, structures, automobiles, etc., by swabbing with rags soaked in solvent. Treat the rags then as creosote-contaminated.
9. Call the Dispatcher and inform him of the event and actions taken; (801) 220-2436.
10. If help is needed in cleanup, call the Dispatcher for his help.
11. Transport all creosote waste, contaminated gravel and earth, and other materials to the original destination.

TABLE 6.2**REQUIRED INSPECTIONS AT THE PACIFICORP IDAHO FALLS HWMF**

| <u>Unit, Area, Equipment</u> | <u>Inspection</u> | <u>Frequency</u> |
|------------------------------|---|--|
| General Facility | 1. Fire extinguishers | Quarterly |
| | 2. Safety shower | Quarterly |
| | 3. Eyewash | Quarterly |
| | 4. Spill control equipment kits | Quarterly |
| | 5. Face shields, disposable protective clothing | Quarterly |
| | 6. Communication equipment (telephones) | In continuous use (quarterly checkoff) |
| | 7. First-aid kit | Quarterly |
| | 8. Lights | Quarterly |
| | 9. Warning signs | Quarterly |
| | 10. Alarm and emergency shutdown system | Quarterly |
| | 11. Logbook completeness | Weekly |
| | 12. Manifest completeness and accuracy | As needed |
| | 13. Manifests returned on time | As needed |
| | 14. Weekly / Monthly / Quarterly Inspection checklists complete | Weekly / Monthly / Quarterly |

TABLE 6.3**GATES AND USES**

| | | |
|---------|---|---|
| Gate #1 | Location: Use: Description: Total Width: | West side of south fence Secondary entrance to the facility 2 swinging gates 32 feet |
| Gate #2 | Location: Use: Description: Total Width: | North end of fence North end access 2 swinging gates 24 feet |
| Gate #3 | Location: Use: Description: Total Width: | Middle of east fence Pedestrian traffic 1 swinging gate 4.5 feet |
| Gate #4 | Location: Use: Description: Total Width: | South end of west fence Secondary entrance to facility Manual gate 30 feet |
| Gate #5 | Location: Use: Description: Total Width: | South end of east fence Main entrance to facility Motorized roller gate 30 feet |
| Gate #6 | Location: Use: Description: Total Width: | North end of gate Pedestrian traffic One swinging gate 3 feet |
| Gate #7 | Location: Use: Description: Total Width: | Middle of north HWMF fence Pedestrian gate 1 swinging gate 4 feet |
| Gate #8 | Location: Use: Description: Total Width: | Middle of east HWMF fence Pedestrian gate 1 swinging gate 4 feet |

FORM 6.1

WEEKLY INSPECTION CHECKLIST
PACIFICORP HAZARDOUS WASTE MANAGEMENT FACILITY IDAHO FALLS HWMF

Name of Inspector: _____

Date of Inspection: _____ Time of Inspection: _____

Inspection Items:

YES / NO

| | | |
|---|--|--|
| 1 | Have all gates remained locked except when personnel are entering or leaving? | |
| 2 | Is there any damage or issues relating to the HWMF asphalt cover, storm drains, buildings, fences, berms, secondary containment curbing, etc. that requires immediate repair or attention? | |
| 3 | Are all the well heads locked? | |
| 4 | Are any well heads leaking? | |
| 5 | Are there any leaks in yard piping from wells to the wastewater facility? | |
| 6 | Are there any leaks at the piping or weir box in the wastewater facility? | |
| 7 | Is there water flowing from the floor into the floor sump? | |
| 8 | If excess water is observed in floor sump, is the sump pump operating correctly? | |

FORM 6.1

**WEEKLY INSPECTION CHECKLIST
PACIFICORP HAZARDOUS WASTE MANAGEMENT FACILITY IDAHO FALLS HWMF**

9 Record the well pump flows at the weir box and at the electronic flow meter displays. Also record the totalized flow at the display of each well pump electronic flowmeter.

| | WEIR BOX READING | WEIR BOX GPM | FLOW METER GPM | FLOW METER TOT GAL |
|-------|---------------------|-----------------|----------------------|--------------------------|
| A-01 | | | | |
| A-02 | | | | |
| B-01 | | | | |
| B-02 | | | | |
| C-01 | | | | |
| MW-09 | | | | |
| R-02 | | | | |
| R-05 | | | | |
| R-06 | | | | |
| R-07 | | | | |
| R-08 | | | | |
| R-10 | | | | |
| R-11 | | | | |
| R-12 | | | | |

10 Record the final effluent flowrate and totalized flow at the electronic flowmeter display.

| GPM | TOTAL GALLONS |
|-----|------------------|
| | |

FORM 6.1

**WEEKLY INSPECTION CHECKLIST
PACIFICORP HAZARDOUS WASTE MANAGEMENT FACILITY IDAHO FALLS HWMF**

| | | | |
|----|--|------------|-------------|
| 11 | Record the final effluent temperature and pH shown at the analytical instrument displays. | TEMP (°F) | PH (S.U.) |
| | | | |
| 12 | Verify that the local instrument readouts collected above match the daily report data shown on the SCADA computer. Describe inconsistencies below: | YES / NO | |
| | | | |
| | | | |
| 13 | Observe the wet well and verify that the water level rises and falls while the pumps are operated automatically on and off by the SCADA computer. | YES / NO | |
| | | | |
| 14 | Record the SCADA flow and local pressure gauge from the wet well pump(s) and record the pump operating at the time of this entry. Verify that flow and pressure correspond to the manufacturer's pump curve. | GPM | PSIG |
| | | | |
| 15 | Record the inlet and outlet pressure gages at the lead GAC adsorption columns. GAC NO 1 GAC NO 2 | INLET PSIG | OUTLET PSIG |
| | | | |
| | | | |
| 16 | Record the inlet and outlet pressure gages at the lag GAC adsorption columns. GAC NO 1 GAC NO 2 GAC NO 3 | INLET PSIG | OUTLET PSIG |
| | | | |
| | | | |
| | | | |

FORM 6.1

**WEEKLY INSPECTION CHECKLIST
PACIFICORP HAZARDOUS WASTE MANAGEMENT FACILITY IDAHO FALLS HWMF**

| | |
|--|--------------------------------|
| <p>17 Record the SCADA computer readout of electronic pressure measurement at the GAC adsorption columns.</p> <p align="center">LEAD COLUMN INLET PIPING</p> <p align="center">BETWEEN LEAD/LAG COLUMNS</p> <p align="center">LAG COLUMN OUTLET PIPING</p> | <p align="center">PSIG</p> |
| <p>18 Verify that the GAC column local instrument readouts match the pressure data shown on the SCADA computer. Describe significant inconsistencies below:</p> | <p align="center">YES / NO</p> |
| <p>19 Other general comments.</p> | |
| <p>20 COMMENTS AND CORRECTIVE ACTIONS: repairs needed, date repairs were made, corrective measures, damage, labeling, etc.</p> | |

FORM 6.2

HAZARDOUS MATERIALS CLEANUP CHECKLIST

Hazardous
Materials

1. _____ Flow of hazardous material stopped and area secured.
2. _____ Responsible person or Dispatcher notified.
3. _____ Each crew member wearing protective clothing.
4. _____ Record nameplate of failed equipment and amount of oil or hazardous waste spilled (released).
5. _____ List materials to be placed in 55-gallon drums or container for disposal.
6. _____ Place all contaminated materials in the drums or containers for disposal.
7. _____ All other equipment for reuse decontaminated.
8. _____ Hazardous Material Disposal Record properly completed.
9. _____ Drums labeled, numbered and securely loaded.
10. _____ Trucks and containers labeled as required.
11. _____ Reports filled out properly.
 - 11a. _____ Facility copy of the Hazardous Material Disposal Record detached and given to the company employee responsible for the site (Emergency Coordinator).
 - 11b. _____ Other copies of Hazardous Material Disposal Record sent to disposal with drums.
12. _____ Final check for complete cleanup.

FORM 6.3

**MONTHLY INSPECTION CHECKLIST
PACIFICORP CHEMICAL RESPIRATOR
IDAHO FALLS POLE YARD**

| | | |
|--|-------|----|
| Inspector Name: | Date: | |
| Inspection Items: | Yes | No |
| 1. Are the respirators stored in designated locations? | | |
| 2. Are respirators in condition for instant use? | | |
| 3. Does each Pole Yard employee have an assigned respirator that is present in storage? | | |
| 4. Has each respirator been repaired, cleaned, and disinfected after each use? | | |
| 5. Has each canister been inspected after every use? | | |
| 6. Is each canister labeled with the following? "HIOSH Approval Number TC-23C-287," or "For use in atmospheres containing not more than 0.1 percent organic vapors." | | |
| COMMENTS AND CORRECTIVE ACTIONS: | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

FORM 6.4

**QUARTERLY INSPECTION CHECKLIST
 PACIFICORP HAZARDOUS WASTE MANAGEMENT FACILITY
 IDAHO FALLS POLE YARD
 (Page 1 of 3)**

| | | |
|---|----------------------|--|
| All items below shall be checked monthly, or more often if need be. The monthly inspections shall be intensive and will disclose preventive maintenance and repair or replacement requirements. In the observations column, point out these requirements and under Comments include proposed corrective actions. Inspections shall be performed by the Yard Supervisor, or his designee, in accordance with Permit Condition II.E, as required by IDAPA 58.01.05.08 [40 CFR §264.15]. | | |
| Inspector Name: | | |
| Title: | | |
| Weather Conditions: | | |
| Equipment | Check if Operational | |
| SAFETY | | |
| Fire extinguishers | | |
| Protective clothing | | |
| Safety shower | | |
| Eye wash | | |
| Face shields | | |
| Fist aid kits | | |
| Chemical respirators (inspect per Table 2) | | |
| SECURITY | | |
| Lighting | | |
| Telephones | | |
| Warning Signs | | |
| Fences | | |
| Gates and locks | | |
| Alarm emergency | | |
| Check leak detection system by walking the sensor cables and inspecting the sump and wet well high level switches. | | |
| Check for normal temperature of electrical enclosures and control panel. | | |

FORM 6.4

**QUARTERLY INSPECTION CHECKLIST
 PACIFICORP HAZARDOUS WASTE MANAGEMENT FACILITY
 IDAHO FALLS POLE YARD
 (Page 2 of 3)**

| | | |
|---|----------------------|----|
| SATELLITE ACCUMULATION | | |
| Are all barrels containing waste: | Yes | NA |
| Properly labeled? | | |
| Date? | | |
| Leaking? | | |
| Inside building? | | |
| INVENTORY | | |
| Dewatering paper | Hexane | |
| Granular Activated Carbon Filtration Media | | |
| HWMF COVER | | |
| No major deterioration | | |
| Proper run-on, runoff | | |
| Benchmark | | |
| Undamaged | | |
| Spill Control Equipment Kits | Spill Kit 146 | |
| 2 pairs disposable gloves | | |
| 2 sets disposable plastic boots, jackets, pants | | |
| 2 pair chemical goggles | | |
| 5 lbs. absorbent rags | | |
| 5 lbs. oil sorbent | | |
| 2 large plastic bags | | |
| 1 quart sample container | | |
| 1 can hand cleaner | | |
| 1 gallon Penetone 155 solvent | | |
| 1 roll tape | | |
| 2 vinyl "Hazardous West" labels | | |

VOLUME 1 CHAPTER 5

5.0 CONTINGENCY PLAN

5.1 PURPOSE

This Contingency Plan has been prepared in compliance with federal regulations 40 CFR Part 264 Subpart D in order to identify potential hazards to human health or the environment from fires or any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water. This Contingency Plan then establishes measures to prevent or minimize these potential hazards and also establishes guidelines for personnel to follow. These guidelines include emergency plans which are to be implemented after an accident, i.e., spill cleanup procedures, fire control methods, evacuation procedures. This plan, therefore, provides specific emergency procedures to be implemented immediately whenever an identified hazard occurs at the facility. Signatures certifying knowledge of and approval by individuals responsible for compliance with this plan are included as Forms 5.1 through 5.5 in Volume I Appendix C of this permit reapplication.

The Spill Prevention and Response (SPR) Plan is included as Volume I Chapter 6 of this permit reapplication. The SPR Plan is being included as a supplement to the Contingency Plan.

5.2 SCOPE

This Contingency Plan and the SPR Plan must be implemented whenever there is a creosote or creosote-contaminated groundwater leak, spill or discharge, or a fire which threatens the release of creosote constituents (see 40 CFR Part 264.52).

5.3 RESPONSIBILITIES

Following implementation of the proposed system automations, there will be three primary roles for personnel involved with the Idaho Falls Pole Yard Treatment Facility:

- The **HWMF Manager** shall be responsible for remotely monitoring the facility and directing activities of an on-site Environmental Technician. The HWMF manager will also be responsible for implementing the RCRA Post Closure Care Permit requirements, enforcing the site specific Health and Safety Plan (29 CFR Part 1910.120), ensuring compliance with all hazardous waste management regulations (40 CFR Part 262), ensuring compliance with this contingency plan, and implementing the spill prevention and response plan.
- In the event that an emergency condition develops at the site, an **Emergency Coordinator** will serve as the first responder operations level as defined in the code of federal regulations (29 CFR 1910.120(q)(6)(ii)). This person would be notified of the emergency condition by the on-site technician or by the automated electronic monitoring systems. The Emergency Coordinator would initiate requests to supporting governmental agencies and serve as the PacifiCorp representative as required by the emergency situation.
- The on-site **Environmental Technician** will be responsible for groundwater monitoring, maintaining the treatment system, and perform weekly, monthly, and quarterly inspections. It is anticipated that the Environmental Technician will be on-site at least one day per week. If an emergency occurs while the technician is on-site he/she would serve as the first responder at the awareness level as defined in federal regulations (29 CFR 1910.120(q)(6)(i)). The technician would stay a safe distance from the emergency and communicate with the local emergency responders and the PacifiCorp Emergency Coordinator. If the Environmental Technician has had the OSHA Hazwoper Supervisors Training including instruction on emergency response at the operations level, then the on-site environmental Technician will serve as the Emergency Coordinator.

5.4 ORGANIZATION AND DUTIES

5.4.1 Emergency Coordination

In most cases, the on-site Environmental Technician will also serve as the Emergency Coordinator. Upon detection of an emergency or significant alarm condition, the Control Computer's automated electronics will simultaneously notify the 24hour Rocky Mountain Power North Switching Desk (RMP-NSD) in Salt Lake City, UT and the Emergency Coordinator. The Emergency Coordinator will contact the RMP-NSD to verify that he has received notification and is following the prescribed procedures to coordinate emergency response. If the Emergency Coordinator cannot be reached and fails to contact the RMP-NSD, the dispatcher at RMP-NSD will notify the next Emergency Coordinator as listed in Table 5.1.

If the on-site smoke detector senses the presence of a potential fire, the emergency notification sequence would be as indicated above except that the Idaho Falls Fire Department would be notified immediately by the control computer. The Emergency Coordinator and the RMP-NSD in Salt Lake City would then be notified. The codes to access the electronic gate at the IFPY facility, keys to the buildings onsite, and material safety data sheets will be provided in advance to the fire department, police department, and Idaho Regional Medical Center.

5.4.2 Emergency Response

The Emergency Coordinator will do the following:

- Determine initial emergency response, i.e., fire control, countermeasures, or evacuation.
- By telephone or voice, contact all personnel onsite, inform them of any hazard and direct their activities.
- Initiate SPR Plan and fire-fighting procedures per Volume I Chapters 5 and 6 of this permit reapplication.

- Notify appropriate local agencies (fire departments, police, hospitals, ambulances, etc.) with designated response roles whenever their assistance is needed (see Section 5.5.2 below).
- In compliance with federal regulation 40 CFR 302.6, if a release occurs, within any 24 hour reporting period, that exceeds the CERCLA reportable quantity of 1 pound of creosote, then immediately notify the National Response Center (1-800-424-8802).
- Once on site, ascertain the severity of the situation by observation and/or review of Material Safety Data Sheets, Safety Manual, facility records or shipping documents, and, if necessary, by review of chemical substance handbooks.
- Assess possible hazards to the environment and human health (i.e., effect of toxic gases generated due to fire, need to disconnect power, etc.).
- Note existing weather conditions to guide response.
- Take all reasonable measures necessary to ensure that fires and releases do not occur, recur or spread.
- Monitor for leaks, pressure buildup, or ruptures in valves, pipes or other equipment when the operations of the facility are affected.
- Secure assistance from the General Office or Regional forces of PacifiCorp if required.
- Contact and secure services of contractors as listed for hazardous waste spills if the spill containment and cleanup is beyond the capability of the utility.
- Take notes in the operating record of the following: the time, date and details of any incident that requires implementing this Contingency Plan.
- Maintain a list of all telephone calls and actions regarding the event, including times of calls and events.

- Prepare and submit a written report to the HWMF Manager as soon as possible after the event. Included in this report will be recommendations regarding any preventive measures that could be taken to prevent any future hazardous waste contingencies.
- Notify appropriate local authorities if his assessment of the situation indicates that evacuation of local areas may be advisable.
- Report immediately any hazardous waste spill that can, may, or does become water-borne to the U. S. Coast Guard National Response Center, phone 1-800-424-8802; DEQ State of Idaho Office at 1-208-373-0502.; DEQ Regional Idaho Falls Office at 1-208-528-2650. The number for State Communication where information about a hazardous spill will be dispatched to either the DEQ or to Homeland Security is 1-800-632-8000.
- Notify the DEQ State Office or its duly-appointed representative; the Idaho Department of Environmental Quality, Waste Management and Remediation Division, phone 1-208-528-2650; and appropriate state and local authorities that no waste that may be incompatible with the discharged material will be treated, stored, or disposed of until cleanup procedures are completed, and all emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use before operations are resumed.
- Within 15 days after the incident the HWMF Manager must submit a written report on the incident to the DEQ Director. The report must include:
 1. Name, address, and telephone number of the owner or operator;
 2. Name, address, and telephone number of the facility;
 3. Date, time, and type of incident (eg., fire, explosion);
 4. Name and quantity of material(s) involved;
 5. The extent of injuries, if any;

6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. Estimated quantity and disposition of recovered material that resulted from the incident.

5.5 COORDINATED EMERGENCY SERVICES

5.5.1 List of Emergency Coordinators and Alternatives

A list of qualified emergency coordinators including the HWMF Manager is posted with the coordinators listed in the order in which they will assume responsibility; this list is shown on Table 5.1. Included are their addresses and phone numbers (office and home). This list has been supplied to all parties involved.

5.5.2 Off-Site Emergency Services

5.5.2.1. Emergency Episode Notification

In the event of an emergency episode that may involve offsite persons, property, or resources or which may cause any injury or damage, the emergency coordinator will initiate notification of the proper agencies as follows:

Note: The following agencies are to be called by or with the approval of the HWMF Manager or emergency coordinator only:

- U. S. Coast Guard National Response Center Phone: 1-800-424-8802
- State of Idaho Emergency Communications - 1-800-632-8000

5.5.2.2. Local Authorities

This section of the Contingency Plan identifies available off-site emergency services. According to 40 CFR 264.37(a) "The owner or operator must attempt to make the

following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations".

Arrangements, along with the distribution of the Contingency Plan, have been made with the following:

| | |
|---|----------------|
| Emergency | 911 |
| Idaho Falls Police Department | 1-208-529-1200 |
| Idaho Falls Fire Department | 1-208-529-1200 |
| Idaho State Police | 1-208-884-7000 |
| State Emergency Communications | 1-800-632-8000 |
| Eastern Idaho Public Health Dept. District 7 | 1-208-522-0310 |
| Bureau of Homeland Security | 1-208-422-3040 |

The following hospital has been contacted and made aware of the activities of the Idaho Falls HWMF and of the properties of creosote and type of injuries or illnesses which could result from fires or releases at the facility:

Eastern Idaho Regional Medical Center 1-208-529-6111

5.5.2.3. Contractors

Should HWMF personnel be unable to perform the cleanup operation and it is necessary for cleanup to begin immediately outside contractors may be notified for on-site cleanup only. Outside contractors will have received, and kept current, 40 hour OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) training. Local contractors that may be sub-contracted in the event of a cleanup operation are listed on the DEQ website, www.deq.idaho.gov. There is a link at the DEQ website entitled 'Waste' and following another for 'Assistance to Businesses' where lists of investigation, remediation, management, laboratories, and disposal contractors.

The following companies are qualified hazardous spill clean-up contractors listed at the DEQ website:

Pacific West Environmental
1515 West 2200 South, Suite C
Salt Lake City, UT 84119
(801) 972-2727

Northwind Environmental, Inc.
1425 Highman Street
Idaho Falls, ID 83402
(208) 528-8718
Contact: Joe Rothermel, ext. 185
www.northwind-inc.com

West Valley Contractor
737 A. French Gulch
Kingston, ID 83850
(208) 691-7813
(208) 682-4924

Other contractors with light earth-moving capabilities who are willing to do cleanup work and have current HAZWOPER training may also be contacted and used for cleanup operations. However, it is necessary to inform the contractor that the contaminated material he is handling must be transported by an EPA-permitted handler and disposed of at an EPA-permitted hazardous waste disposal site. If the discharge is massive, special cleanup efforts such as those provided by the Coast Guard may be necessary. In this case, Mr. Jeff Tucker of PacifiCorp at 1-801-220-2989 (office) or 1801-660-5750 (cell) would initiate this effort.

The following companies are qualified to transport hazardous material off-site to a permitted hazardous waste disposal facility:

U.S. Ecology of Idaho
PO Box 400
Grandview, ID 83624
www.americanecology.com

Envirocare of Utah, Inc.
215 South State Street, Suite 1160
Salt Lake City, UT 84111
www.energysolutions.com

Aptus (Div. of Clean Harbors)
P.O. Box 27448
Salt Lake City, UT 84127
(801) 323-8100

Hazardous wastes/materials that are removed from the site are to be taken to one of the following permitted hazardous waste disposal sites:

U.S. Ecology – Site B
P.O. Box 400
Grandview, ID 83624
Compliance Manager: Matthew Alvarado
1-800-274-1516

Clean Harbors Grassy Mountain, LLC
Grassy Mountain Landfill
Grassy Mountain HWMF near Knolls, UT
Phone: 1-801-323-8900
EPA Disposal Site ID No. UTD 991 301 748

NOTE: All of these services are to be requested only by the HWMF Manager in conjunction with the Environmental Director of PacifiCorp.

5.5.3 List of Emergency Equipment

A summary of all emergency equipment and facilities on site, including locations, physical descriptions, and capabilities, is presented on Figure 2.16 and in Table 5.2.

5.5.3.1. Internal Communication or Alarm System

In the event that the plant shuts down for any reason, the automated alarm system will call the RMP-NSD and the HWMF Manager. If the HWMF Manager cannot be contacted, operators at the RMP-NSD will contact one of the emergency coordinators

listed on Table 5.1, who will evaluate the emergency situation. Due to the size of the site and the limited number of personnel who would be expected at the site, visual and vocal communication is considered adequate for on-site communication.

5.5.3.2. External Communication System

Telephones are the external communication system which will be used by any personnel on site to make any necessary calls to police, fire departments or any other emergency service. After the system is automated in 2009, the control computer at the site will also have the capability to send phone and electronic mail notifications.

5.5.3.3. Fire Extinguishing System

Should a fire occur at the treatment plant, fumes could result from creosote present in the treatment columns. After completion of the system automations in 2009, a fire alarm system will alert the Control Computer which will then begin the alert notification procedure. No other fire is anticipated which could release hazardous materials. Buildings, however, are susceptible to fire, and one or more fire extinguishers have been situated in obvious and easily obtainable locations. In the event of a fire starting while the HWMF Manager was onsite, there are presently adequate fire extinguishers as described on Table 5.2 and in the locations shown on Figure 2.16.

There are four city fire hydrants located outside but near the HWMF. Three are located on the east side of Leslie Avenue approximately 400 feet apart, supplied by the Idaho Falls public water supply and have rated capacities of 1277 gpm at 54 flow psig. The other hydrant is located on the east side of 23rd Street near the main gate and has a rated capacity of 1060 gpm at 42 flow psig.

In the event of a severe emergency the Snake River is located about 3,000 feet from the northwest side of the facility.

5.5.3.4. Spill Control Equipment

This facility has two spill control equipment kits located near the pre-treatment clarifier. Each truck, which would transport creosote for off-site disposal, should also carry a kit similar to this. The kits are contained in sealable 55-gallon drums. The contents are itemized in Table 5.2.

All facility communications or alarm systems, fire protection equipment, safety equipment, discharge control equipment, and decontamination equipment where required, shall be tested and maintained as necessary to assure its proper operation in time of emergency. Existing emergency equipment locations are given in Figure 2.16.

5.5.3.5. Emergency Phone Numbers

Emergency phone numbers for additional assistance or after-hours notification are included in Table 5.1.

5.6 EVACUATION PLANS

The Emergency Coordinator is responsible for ascertaining the need for evacuation and extent of evacuation and for implementing the evacuation procedure. He is also responsible for the immediate evacuation of himself and any other personnel that might be on site. He is responsible for directing employees and visitors to the proper exits and to a designated safe area outside of the facility boundaries. The Emergency Coordinator shall review the evacuation procedures and routes at least once per year. Escape routes, building, emergency equipment, gate locations and escape routes are shown in Figure 2.16 and must be posted by the Emergency Coordinator in visible areas around the site.

5.6.1 Evacuation Procedures

- The Emergency Coordinator will notify all employees if an evacuation may be necessary.

- The Emergency Coordinator will assess the conditions and order an evacuation or other actions required and will call the police and fire departments to inform them of what actions are being implemented.
- When an evacuation is announced, stop work. The Emergency Coordinator will direct visitors and employees to the appropriate exit(s).
- All visitors and employees must leave the facility and report to the designated assembly area. Do not run. Do not linger in entranceways or driveways. Stay together in the assigned safe area.
- Each visitor and employee must report to the Emergency Coordinator once outside the facility.
- The Emergency Coordinator must report to the HWMF Manager when all personnel have cleared the facility.
- Stay outside the facility until notified by the Emergency Coordinator to re-enter.

5.6.2 Evacuation Routes - Exit Assignments

- The attached layout of the HWMF, Figure 2.16, identifies the buildings, emergency equipment, gate locations, and escape routes. Fire stations and fire extinguishers are noted on the layout.
- The designated assembly areas shall be located outside the facility - one near the pedestrian gate #3 and the other south of the main gate #5.

5.6.3 Emergency Precautions

- Keep calm; think; avoid panic and confusion.
- Know the exit locations. Be sure you know the safest and quickest way out of the facility.

- Do not lock office doors when vacating the facility. The Environmental Technician and outside emergency support personnel must have visual access to all areas to ensure that the facility is clear of any personnel.
- Do not delay evacuation of the facility for any reason.
- Do not assist in any emergency response activities in which you are not properly trained and qualified.
- Do not use voice-paging system. The paging system must be left open for issuing plant-wide instructions.
- When evacuating the facility, WALK to the exit. Report to the designated area away from the facility and wait for instructions.
- Keep out of the way, stay clear of the facility, and DO NOT interfere with emergency conditions.

DO NOT re-enter the facility until instructed to do so.

5.6.4 Follow-through

- The Emergency Coordinator shall confer with fire department personnel and police and other emergency response personnel who respond to evaluate the extent of danger and proper countermeasures (firefighting, etc.) and the safety precautions to be taken.
- The Emergency Coordinator under the direction of the HWMF Manager will assign qualified personnel to assist in the countermeasures and will direct the effort.
- The Emergency Coordinator, in cooperation with governmental emergency response personnel, will ascertain when the emergency has been contained and when it is safe for personnel to re-enter the site for cleanup activities. He will determine which personnel will re-enter the site and direct the re-entry.

- At this point the SPR Plan becomes the guiding document for cleanup operations.
- All tools, equipment, and contaminated surfaces must be decontaminated as spelled out in the SPR Plan.
- The HWMF Manager and Emergency Coordinator will maintain contact with Environmental Director of PacifiCorp, who will supply skilled personnel as required.

5.7 COPIES OF THE CONTINGENCY PLAN

A copy of the Contingency Plan has been submitted to the Idaho Department of Environmental Quality, with the RCRA Part B Post Closure Permit Application.

Copies and revisions of the Contingency Plan shall be maintained at the main office of the HWMF, and when it is deemed appropriate, it shall be given to the proper off-site emergency services. A list of copies, has been included as Table 5.3 and will be maintained at the HWMF including the following:

- The number of copies of the Contingency Plan in existence
- The recipients of the Plan
- Transmittal letters documenting delivery of the Plans
- The number of copies being retained at the site
- The location of the copies on the site

5.8 AMENDMENTS TO THE CONTINGENCY PLAN

The Contingency Plan will be reviewed and amended whenever the following occurs:

- The facility permit is revised
- The plan fails in an emergency

- The list of emergency coordinators changes
- The list of emergency equipment changes
- The facility design, construction, operation, maintenance, or other circumstances change to increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency.

Any amendments to the Contingency Plan will be judged a modification to the facility permit except a change to the lists of emergency coordinators, which is considered to be “equivalent or superior information”.

Any proposed modifications to the Contingency Plan will be submitted to the Idaho Department of Environmental Quality for approval. Contingency Plan modifications requiring Agency approval are outlined in 40 CFR Part 264.54(d) and (e).

The Emergency Coordinator will be responsible for periodically checking the Contingency Plan for any needed revisions. That person shall also be responsible for ensuring that all copies of the plan which are stored off-site and on-site are revised. That person is the facility's post-closure contact person as shown on Table 5.1.

TABLE 5.1

EMERGENCY CONTACTS

LIST OF EMERGENCY COORDINATORS

Below is a list of qualified Emergency Coordinators posted in the order in which they will assume responsibility. Included is their addresses and phone numbers (office and cell). This list has been supplied to the Chief Dispatcher.

1. Dennis Vanderbeek
2200 Leslie Avenue
Idaho Falls, Idaho 83402
Office: 208-745-6075
Cell: 208- 705-7757

2. Jeff Tucker
1407 W. North Temple, #280
Salt Lake City, UT 84116
(HWMF Manager)
Office: 1-801-220-2989
Cell: 1-801-660-5750

EMERGENCY PHONE NUMBERS

- Idaho Falls Police Department 208-529-1200
- Idaho State Police 208-884-7000
- Idaho Falls Fire Department 208-529-1200
- Bureau of Homeland Security 208-422-3040
- Idaho Falls Hospital 208-529-6111
- Rocky Mountain Power North Switching Desk 801-220-6981
- Rocky Mountain Power North Trouble 801-220-6979
- Idaho Falls HWMF Personnel:
 - Dennis Vanderbeek 208-745-6075
 - Jon Goss 208-356-3350

IDAHO FALLS HWMF POST-CLOSURE CONTACT PERSON AND RESPONSIBLE PERSON FOR DOCUMENT UPDATE

Jeff Tucker
Principal Engineer
PacifiCorp Environmental Remediation Company
1407 W. North Temple, #280
Salt Lake City, UT 84116
(801) 220-2989

Corporate Phone (System Dispatcher): 802-220-2436

TABLE 5.2
EMERGENCY EQUIPMENT
Page 1 of 3

| | | DESCRIPTION |
|--|--|--------------------------------|
| 1. FIRST AID KIT (in Lab) | | Standard |
| 2. EYE WASH STATION (in Lab) | | Standard eye wash |
| 3. EMERGENCY SHOWER (next to Lab) | | Cold Water |
| 4. SPILL CLEANUP KIT | | |
| 2-4 pairs | Disposable gloves | Neoprene or approved alternate |
| 1-2 sets | Disposable plastic boots, jackets and pants | Water resistant |
| 2 pairs | Chemical goggles | ANSI Z87.1-1989 |
| 1 each | Short-handled broom | Standard |
| 1-5 lbs. | Absorbent rags | Standard |
| 1-5 lbs. | Oil sorbent | Standard |
| 1-2 each | Large plastic bags | Standard |
| 1 can | Hand cleaner | Standard |
| 1 gal. | Solvent | Penetone–Water based solvent |
| 1 roll | Tape | Duct tape |
| 1-6 each | “HAZARDOUS WASTE” labels | Standard |
| 1 each | Pencil | Standard |
| 1 each | Short-handled shovel | Standard |
| 1 each | Dustpan | Standard |
| 1 each | Sealable 55-gal. drum (containing the above) | Steel |

TABLE 5.2
EMERGENCY EQUIPMENT
Page 2 of 3

**5. OTHER STANDARD SPILL
RESPONSE EQUIPMENT**

| Quantity | | Description |
|-----------------|---|--|
| 1 set | Disposable chemical-resistant clothing (gloves, jacket, pants, boots) | Neoprene or approved alternate |
| 2 | Respirators (in Lab Area) | As specified by the Pacificorp Safety Department |
| 1 | Chemical goggles | ANSI Z87.1-1989 |
| 1 set | Sealable 55-gallon drum | Steel |
| 1 liter | Solvent | Penetone or Stoddard |
| 1 set | Shovel and Drum Handling Equipment | Standard |
| 100 feet | Nylon cord | ¼-inch diameter |
| 2 | Barricades | Standard |
| 1-5 lbs. | Absorbent rags | Standard |
| 1-10 lbs | Sorbent material | Saw Dust or Sorball |
| 1-10 lbs | Sorbent mats | Oil absorbing mats |
| 1-30 lbs | Sorbant booms | Oil absorbing booms |

TABLE 5.2
EMERGENCY EQUIPMENT
Page 3 of 3

6. FIRE EXTINGUISHERS

| Building | Location/Quantity | Fire Extinguisher Type – Capabilities |
|-----------------|--------------------------|---|
| Office Building | North Wall / 1 | 20 # Dry Chemical – Compressed CO ₂ fire suppressant |
| Framing Shed | North Wall / 1 | 20 # Dry Chemical – Compressed CO ₂ fire suppressant |
| | South Wall / 1 | 20 # Dry Chemical – Compressed CO ₂ fire suppressant |
| | South Wall / 1 | 2.5 Gallons – Delivers water under pressure |
| Treatment Shed | Northwest Door / 1 | 20 # Dry Chemical – Compressed CO ₂ fire suppressant |
| | Northeast Door / 1 | 20 # Dry Chemical – Compressed CO ₂ fire suppressant |
| | Partition Door / 1 | 20 # Dry Chemical – Compressed CO ₂ fire suppressant |
| | Laboratory / 1 | 20 # Dry Chemical – Compressed CO ₂ fire suppressant |
| Boiler Building | West Wall / 1 | 20 # Dry Chemical – Compressed CO ₂ fire suppressant |

7. TELEPHONES

| Building | Location/Quantity | Phone Type |
|-----------------|--------------------------|---------------------|
| Laboratory | East Side / 1 | Dedicated land line |
| Laboratory | Northeast Side / 1 | Dedicated land line |

TABLE 5.3

RECORD OF COPIES CONTINGENCY PLAN INCLUDING SPILL PREVENTION AND RESPONSE PLAN

PACIFICORP HAZARDOUS WASTE MANAGEMENT FACILITY

The following copies of these plans are now on file. All copies will be maintained in updated condition. All substantive changes will be submitted to the Idaho Department of Environmental Quality for approval as stated in Section 8.0 of the Contingency Plan.

There are eleven (7) copies of this Contingency Plan:

The original and one copy are on file at the Idaho Falls Hazardous Waste Management Facility Main office.

One copy is on file at the PacifiCorp office located at 1407 West North Temple, Salt Lake City, UT 84116.

One copy has been sent to Robert Bullock, Idaho Department of Environmental Quality – Waste Management and Remediation Division, 1410 North Hilton, Boise, ID 83706.

One copy has been sent to the Idaho Falls Fire Department, 208 Constitution Way, Idaho Falls, ID 83402.

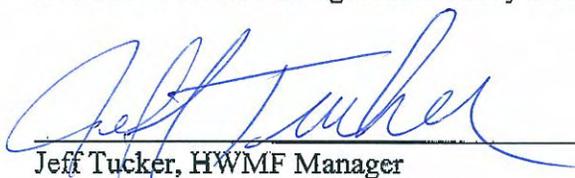
One copy has been sent to the Columbia Eastern Idaho Regional Medical Center, 625 Shoup Ave., Idaho Falls, ID 83402.

One copy has been sent to the Bonneville County Sheriff, 605 North Capital, Idaho Falls, ID 83402.

FORM 5.1

CONTINGENCY PLAN

40 CFR 264.50 requires that a Contingency Plan be implemented at the PacifiCorp Hazardous Waste Management Facility in Idaho Falls, Idaho. Jeff Tucker of PacifiCorp has the responsibility for providing company resources for implementation of this Contingency Plan. The Hazardous Waste Management Facility (HWMF) Manager has the responsibility to ensure said plan is implemented and complied with. The HWMF Manager is also responsible for implementing the Plan and coordinating the activities specified. The following signatures certify that these people have knowledge of the Hazardous Waste Management Facility Contingency Plan.


Jeff Tucker, HWMF Manager

1/26/2009
Date


Dennis Vanderbeek, On-site Environmental Technician

1-26-2009
Date

FORM 5.2

CONTINGENCY PLAN REVIEW BY LOCAL OFFICIALS

Sirs and Madams:

Today, 6-16-08, I have received an information package from Mr. Jeff Tucker, representing PacifiCorp, concerning the operation of a Hazardous Waste Management Facility at the Idaho Falls site, 2200 Leslie Avenue, Idaho Falls, Idaho 83401.

Printed Name: Lynet Smith

Signed: Lynet Smith

Title: Exec. Assistant

Organization: Administration, EIRMC

FORM 5.2

CONTINGENCY PLAN REVIEW BY LOCAL OFFICIALS

Sirs and Madams:

Today, JUNE 16, 2000, I have received an information package from Mr. Jeff Tucker, representing PacifiCorp, concerning the operation of a Hazardous Waste Management Facility at the Idaho Falls site, 2200 Leslie Avenue, Idaho Falls, Idaho 83401.

Printed Name: MICHAEL S. TAYSON

Signed: Michael S. Tayson

Title: Director Emergency Management Office

Organization: Bonneville County

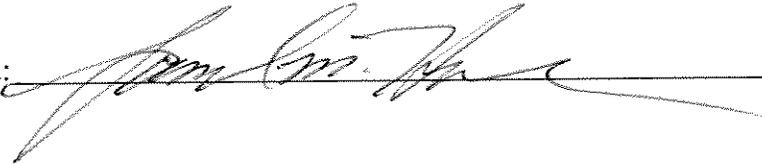
FORM 5.2

CONTINGENCY PLAN REVIEW BY LOCAL OFFICIALS

Sirs and Madams:

Today, June 16, 2008, I have received an information package from Mr. Jeff Tucker, representing PacifiCorp, concerning the operation of a Hazardous Waste Management Facility at the Idaho Falls site, 2200 Leslie Avenue, Idaho Falls, Idaho 83401.

Printed Name: SAMUEL M. HULSE L.T. BONNEVILLE CO SO.

Signed: 

Title: Lieutenant Operations

Organization: Bonneville CO SO

FORM 5.2

CONTINGENCY PLAN REVIEW BY LOCAL OFFICIALS

Sirs and Madams:

Today, 6-16-08, I have received an information package from Mr. Jeff Tucker, representing PacifiCorp, concerning the operation of a Hazardous Waste Management Facility at the Idaho Falls site, 2200 Leslie Avenue, Idaho Falls, Idaho 83401.

Printed Name: Jon C. Burnham

Signed: Jon C. Burnham

Title: DESK OFFICER I.F. P.D.

Organization: Idaho Falls Police Dept.

FORM 5.2

CONTINGENCY PLAN REVIEW BY LOCAL OFFICIALS

Sirs and Madams:

Today, January 16, 2008 I have received an information package from Mr. Jeff Tucker, representing PacifiCorp, concerning the operation of a Hazardous Waste Management Facility at the Idaho Falls site, 2200 Leslie Avenue, Idaho Falls, Idaho 83401.

Printed Name: Tamara Cox

Signed: Tamara Cox

Title: HPPS Division Director

Organization: Eastern Idaho Public Health

FORM 5.2

CONTINGENCY PLAN REVIEW BY LOCAL OFFICIALS

Sirs and Madams:

Today, 6/16/08, I have received an information package from Mr. Jeff Tucker, representing PacifiCorp, concerning the operation of a Hazardous Waste Management Facility at the Idaho Falls site, 2200 Leslie Avenue, Idaho Falls, Idaho 83401.

Printed Name: Julie Miller

Signed: Julie Miller

Title: Admin Assistant

Organization: Idaho Falls Fire Dept