

CONTINGENCY PLAN

ABSTRACT

PURPOSE:

This plan describes the proper action to be taken by employees during an emergency.

RESPONSIBILITIES:

The emergency coordinator or alternate is responsible for implementing the plan during an emergency.

EMERGENCY COORDINATOR:

The facility manager is the emergency coordinator. The alternate emergency coordinators are listed in Appendix F..

EMERGENCY NOTIFICATIONS:

Boise Police Department	911
Boise Fire Department	911
St. Alphonsos Regional Medical Center	208/367-2121
Safety-Kleen Emergency Coordinator (24 hour)	800/468-1760
Idaho Division of Environmental Quality	800/632-8000 - 24 hr. (in state)
Environmental Management Solutions	208/895-0326

4.0 CONTINGENCY PLAN

Safety-Kleen Systems, Inc.
6334 Supply Way
Boise Industrial Park
Boise, Idaho 83716

4.1 PURPOSE

The contingency plan describes the actions to be taken by each employee in the event of a spill, fire or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous materials to the air, soil, surface water, or ground water. The contingency plan is to be carried out immediately whenever there is a release of hazardous material that could threaten human health or the environment, implementing the procedures contained in this plan.

4.2 EMERGENCY COORDINATOR RESPONSIBILITIES

The emergency coordinator is responsible for implementing the contingency plan during an emergency; however, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan should the emergency coordinator or his alternate be unavailable. The facility manager is the emergency coordinator and the alternate emergency coordinators are designated by the facility manager and listed in Appendix F.

The emergency coordinator and alternates must be familiar with all aspects of this contingency plan, the operations and activities at the facility, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the contingency plan. Their home addresses and telephone numbers, as well as the office telephone number, are listed in Appendix F. During non-working hours, at least one employee will be at the facility or on call to respond to an emergency situation.

4.2.1 Responsibilities During an Emergency

Whenever there is an emergency situation that requires implementation of the contingency plan, the emergency coordinator (or alternate) will:

- a) activate the internal facility communication system to notify all facility personnel;
- b) Notify Safety-Kleen's Emergency Response Coordinator using the 24-hour telephone number - 800/468-1760, and
- c) Notify appropriate state or local agencies with designated response roles, if necessary.

Whenever there is a release, fire, or explosion, the emergency coordinator (or alternate) must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do this by observation or by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis.

Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off).

The emergency coordinator and alternates have been adequately trained to respond to an emergency. They have references such as various staff members at the corporate office and the Material Safety Data Sheets to help them make decisions during an emergency.

During an emergency, the emergency coordinator (or alternate) must take measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste storage areas at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

4.2.2 Remedial Action Responsibilities

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator must contact the Safety-Kleen's Emergency Response Coordinator to report the incident. Appropriate remedial actions will be implemented to address contamination resulting from an emergency situation. The treatment, storage and/or disposal of any recovered waste, contaminated soil or surface water that results from an emergency situation must be arranged by Safety-Kleen and carried out as expeditiously as possible.

The emergency coordinator must ensure that, in the affected area(s) of the facility:

- a. no substance that may be incompatible with the released material is brought on site until cleanup procedures are completed; and
- b. all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

4.2.3 Reporting Responsibilities

If the emergency coordinator determines that the facility has had a release that could threaten human health or the environment outside the facility, the coordinator must report those findings as follows:

- a) If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities.
- b) The coordinator must immediately notify the Safety-Kleen Emergency Response Coordinator. The Safety-Kleen Emergency Response Coordinator will report the incident to the Idaho Division of Environmental Quality within 24 hours, including the:
 1. Name and telephone number of notifier;
 2. Name and address of facility;
 3. Time and type of incident (e.g., release, fire);

4. Name and quantity of material(s) involved, to the extent known;
5. The extent of injuries, if any; and
6. The possible hazards to human health, or the environment outside the facility.

The emergency coordinator or alternate must document the time, date, and details of any incident that requires the implementation of the contingency plan. Within 15 days of the incident, Safety-Kleen will submit a written report on the incident to the IDEQ. The report must include:

- a) name, address, and telephone number of the owner or operator;
- b) name, address, and telephone number of the facility;
- c) date, time, and type of incident (e.g., fire, explosion);
- d) name and quantity of material(s) involved;
- e) the extent of injuries, if any;
- f) an assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- g) Estimated quantity and disposition of recovered material that results from the incident.

4.2.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

- a. The person who discovers/causes the spill reports to the Emergency Coordinator or alternate .
- b. The Emergency Coordinator contacts the Safety-Kleen Emergency Response Coordinator.
- c. Safety-Kleen's 24 hour Emergency Response Coordinators or the facility's emergency coordinator will contact the Idaho Division of Environmental Quality.

4.2.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted:

<u>Agency or Authority</u>	<u>Rationale</u>
Police Department	Notify if there is imminent danger to human health.
Fire Department	Notify if there is a fire, uncontrolled spill, or other imminent danger.
Hospital	Notify if there are any injuries.
IDEQ	Report releases and fires.
Environmental Management Solutions	Call to assist with remedial action after a release.

Arrangements have been made to familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility, and possible evacuation routes. Arrangements have also been made to familiarize the local hospital with the types of injuries or illnesses that could result from fires, explosions, or releases at the facility.

4.3 EMERGENCY RESPONSE PROCEDURES

Response actions to be taken in specific emergency situations are described in the sections that follow. Employees must assess the possible hazards to human health or the environment resulting from a release or fire by visually inspecting the area, reviewing Material Safety Data Sheets for the material released, and estimating the extent of the release and identifying the material to which it was released (e.g., soil, waste and/or air). Hazards must be assessed to make relevant

decisions as to the appropriate personal protective equipment necessary to respond to an emergency.

4.3.1 Minor Spills

Minor spills that occur within secondary containment, and do not involve a release of material to the environment normally do not require implementation of the contingency plan. However, procedures for addressing minor spills are summarized in this section. If a spill should occur while pouring spent solvent into a dumpster or filling drums with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station, the material will be collected and appropriately managed. Should the spill occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

- a) If the material spills on a paved area, it will generally be collected with a wet/dry vac, pump, sorbent sheets, and/or granular absorbent. The free liquids (if any) and/or sorbents will be containerized and shipped to a Safety-Kleen recycle center for proper treatment and disposal.

- b) .If the material spills on an unpaved area, attempts to recover any free liquids will be employed as in "a" above. Free liquids, sorbent material, and any contaminated soil must be containerized and shipped to a Safety-Kleen recycle center, or if necessary, to another facility that is permitted to accept the materials for treatment/disposal.

If a spill occurs while moving or delivering containers outside of the warehouse, the response actions described in 'a' and 'b' above must be followed. Spills inside the warehouse and the paint waste shelter will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoor, the doors and windows should be opened to improve the ventilation in the confined area. If solvent is spilled in a non-explosion rated area or is flowing in such, insure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. Then, following the instructions of the appropriate Material Safety Data Sheet (Appendix F), the worker will enter the area wearing appropriate personal protective equipment and containerize the liquid, and return it to storage.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Safety-Kleen Emergency Response Coordinator. The Safety-Kleen Emergency Response Coordinator will contact the IDEQ, if required.

4.3.2 Major Spills

Any spill which can not be completely remediated using the methods described in 'a' and 'b' of section 4.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure or a fire. Spilled material from this type of release can contaminate soil, surface water, ground water, sanitary sewer systems and storm sewer systems. Emergency response to this type of spill should be as follows:

- a) Assist any injured people.
- b) Stop the flow of material, if possible.
- c) Retain, contain or slow the flow of the material if it can not be stopped.
- d) If material escapes containment efforts immediately call the local Fire Department, and report to the emergency coordinator (or alternate) and the Safety-Kleen Emergency Response Coordinator.
- e) Immediately recover to the extent possible, the spilled material to reduce property and environmental damage. Material resulting from a release, fire, or explosion may be stored onsite in containers or in tanks to the fullest extent possible. Material which cannot be contained using the storage facilities on site may be contained in tanker trucks or containers provided by the recycle center or spill cleanup contractor, as necessary.

The emergency coordinator or alternate shall report any incident as soon as possible to the Safety-Kleen Emergency Response Coordinator using the 24-hour telephone number: 800-468-1760. The emergency coordinator or alternate may also be required to report the incident to the National Response Center (telephone: 800/424-8802) and IDEQ (telephone: 800/632-8000 - 24 hour number-in state). An emergency cleanup response contractor may be contacted, if it is deemed necessary.

Spills must be controlled and remediated to the fullest extent possible. However, personnel must not take health or safety risks; if there is any doubt as to whether a particular action is unsafe, it must be avoided. The flow of a released material may be stopped by turning off pumps, closing valves, righting tipped containers, or taking other appropriate actions. If the flow cannot be stopped, a berm should be formed by shoveling dirt or sorbent material around the free liquid to hold it in one place or at least direct it to the area where it will do the least amount of damage (e.g. secondary containment area in the warehouse or the tanker truck loading/unloading area).

The person reporting a spill should be prepared to give his name, position, company name, and address and telephone number. The person reporting should also describe the material spilled and, if possible, some estimate of the amount and the containment status, and specify any equipment needed.

Contaminated material resulting from remedial actions for major spills, will usually be disposed of at a properly permitted treatment or disposal facility since the quantity of waste material will probably exceed the storage capacity of the Safety-Kleen recycle center.

Every spill must be recorded on the Field Spill Report Form (an example is provided in Appendix F). A copy of this report is sent to appropriate Safety-Kleen personnel. Spill report forms and other appropriate information are reviewed with branch personnel to prevent similar spills from occurring in the future.

4.3.3 Fire Control Procedures

It is Safety-Kleen's policy that employees respond to incipient fires; that is those that can be immediately extinguished with a fire extinguisher. Any fire that cannot be immediately controlled, or which has the potential to become uncontrollable warrants implementation of the evacuation plan and the proper authorities will be contacted.

If a small fire occurs, personnel must act quickly with the fire extinguisher to put out the fire before it spreads, where possible, without undue threat to personnel safety. If it can not be extinguished immediately, evacuate the facility and call the fire department. Potential guidelines for response authorities to consider during a fire are discussed below.

Vapors of mineral spirits exposed to a spark or open flame can flash at temperatures over 105° F. A mineral spirits fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a confined area, if possible. The flame should not be extinguished until the flow of the solvent has been stopped. Then attention should be directed immediately to extinguishing the flame.

Paint wastes, and waste solvents can generate carbon monoxide and other poisonous gases. Chlorinated solvents (industrial solvent wastes and dry cleaning wastes) are generally not flammable, but can produce toxic substances when exposed to very high temperatures (about 1200° F). Branch personnel and local authorities must be aware of the proper response, should a fire affect the container storage areas. Examples of potential response procedures are described below:

- a) Isolate the hazard area and deny entry to unauthorized personnel.
- b) Stay upwind; keep out of low areas.
- c) Ventilate closed spaces before entering them.
- d) Wear personal protective clothing
- e) Evacuate a 1,000-foot radius area endangered by the gas.

A fire in the container storage area can best be extinguished by foam, water fog, or water spray (mist).

If a fire in or near the paint waste shelter occurs, a dry chemical, carbon dioxide or foam will best extinguish the fire. Cool the shelter and containers with water until well after the fire has been extinguished.

4.4 EVACUATION PLAN

Clearly marked exits exist in the warehouse and office area and employees are trained to be aware of all potential escape routes. The signal for evacuation is either a verbal or loudspeaker announcement describing the hazard and the need for evacuation. An evacuation is necessary when a release, fire, and/or explosion has occurred or has the potential to occur, or has the potential to generate irritating vapors (it should be noted that the material handled by Safety-Kleen employees are skin and eye irritants at or below OSHA airborne concentration limits), toxic vapors, or deplete

oxygen. In addition, a release, fire, or explosion which has the potential to injure personnel through physical contact or by damaging structures will necessitate evacuation.

When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assemble North of Gowen Road, at the Southeast corner of the Fire Training Field, to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation either from a safe on-site building or from a neighboring facility.

4.5 ARRANGEMENT WITH EMERGENCY RESPONSE CONTRACTORS

An emergency response contractor is identified on the Emergency Information sheet (Appendix F). This contractor will provide emergency assistance during a release and/or cleanup.

4.6 IMPLEMENTATION SCHEDULE

Any discrepancies or deficiencies found during the routine inspection must be corrected expeditiously to insure that the problem does not lead to an environmental or human health hazard. The facility manager has the overall responsibility to ensure that repairs determined necessary during a routine inspection are implemented. Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The facility manager will consult with the corporate environmental and engineering staffs to design an implementation schedule for remedial action.

4.7 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

This plan and all revisions to the plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to local authorities and organizations listed on the Emergency Information sheet (Appendix F) and they may be called upon to provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the facility.

The plan is reviewed and updated, if necessary, whenever:

- a) The facility license is modified to allow new process wastes to be stored or treated, or applicable regulations are revised;
- b) The list or location of emergency equipment changes
- c) The facility changes in its design, construction, operation maintenance, or other circumstances in a way that:
 - 1. Increases the potential for fires, explosions, or releases of hazardous constituents, or
 - 2. Changes in the response necessary in an emergency.
- d) The names, addresses, or phone numbers of emergency coordinators change;
- e) The employee assigned to each emergency task changes; or
- f) The plan fails when implemented in an emergency
- g) If the contingency plan is revised, the local emergency response teams will receive copies of the document.

Modifications to the Contingency Plan will be submitted to the Idaho Department of Environmental Quality in accordance to IDAPA 58.01.05.012 [40 CFR 270.42].

Exhibit E-2

Boise Idaho Storage Facility

Emergency Equipment – See Plans for Locations

1. First Aid Kits – Complete kit located in hallway outside the warehouse restroom.
2. Fire Extinguishers Ten-pound ABC extinguishers located at various points in the building and in the yard.
3. Spill Kit – includes:

Shovels.....	2 each
Aprons.....	2 each
Gloves.....	2 each
Absorbent.....	2 bales
Absorbent Booms	3 each
Respirator.....	1 each
4. Eyewash with Shower Attachment – Located in warehouse restroom and the east side of the tank farm, near the return and fill docks (w/out shower) (see site plan).
5. Intercom System – Throughout building.
6. Telephone System – At dock and in main offices.