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## G.0 Contingency Plan

The information contained herein is submitted in accordance with the requirements of IDAPA 58.01.05.008 and 58.01.05.012 (40 CFR 264.50 through 264.56 and §§270.14(b)(7)). These regulations require facilities that treat, store, or dispose of hazardous wastes to have contingency procedures to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, groundwater, or surface water at the facility. Also included within the scope of this plan is the USEI Rail Transfer Facility (RTF) located on Simco Road approximately 5 miles South of I-84 at exit 74. The provisions of this Contingency Plan are implemented when it is determined that an event could threaten human health or the environment. A copy of the Contingency Plan is maintained at the facility and has been submitted to all agencies which may be called upon to provide emergency services.

During the period of the permit, changes may be made to the facility that necessitate changes in drawings of physical layouts/plans in the Contingency Plan. These changes in drawings of physical layouts/plans will be submitted to IDEQ and all Contingency Plan holders.

## G.1 General Information

This Contingency Plan is for the US Ecology Idaho, Inc.(USEI) treatment, storage, and disposal facility located on Lemley Road, 10½ miles west of Grand View, Idaho (including the RTF). The facility primarily treats, stores and disposes of RCRA Hazardous waste as defined in IDAPA 58.01.05.005 (40 CFR Part 261), TSCA wastes as defined in 40 CFR 761 and other types of solid, non-hazardous and non-regulated wastes. The facility location is shown on Figure G-1. USEI is the operator of the facility.

The facility manages hazardous wastes in a variety of ways:

- Hazardous wastes, including debris, are treated in a variety of units.
- Hazardous wastes are stored in a variety of units.
- Hazardous wastes are disposed of in landfill cells and surface impoundments.
- Storm water run-off is collected in surface impoundments.
- Hazardous wastes are transferred off-site to other treatment, storage, and disposal facilities.

The active waste handling operations at the facility are described in detail in Section D. Pre-RCRA units (historic waste management areas) are identified and described in Section J.

This Contingency Plan is implemented if there is a fire, explosion, or any unplanned release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

## G.2 Emergency Coordinators

In accordance with IDAPA 58.01.05.008 (40 CFR §§264.52(d) and 264.55), the facility maintains a list of Emergency Coordinators (ECs). The list of ECs designates a primary contact as well as alternates in the order in which they assume responsibility in the absence of primary contact. This list of ECs is provided as Table G-1.

An EC is present at USEI during normal business hours when hazardous wastes are being handled. Before or after normal business hours, an EC is immediately available to implement the Contingency Plan upon notification of an imminent or actual incident that could threaten human health or the environment (e.g., release, fire or explosion). When the designated EC is not at the facility, the designated EC is on call that allows facility personnel to contact him directly. Each EC is provided a copy of the Contingency Plan that may be kept at his residence.

The EC has complete authority to commit all the resources of USEI to implement the Contingency Plan in the event of an emergency. Table G-2 lists emergency contacts, that may be contacted by the EC in the event of an emergency.

This table, as well as any other emergency contacts and telephone numbers in the Contingency Plan, is reviewed annually and revised as necessary.

In accordance with IDAPA 58.01.05.008 (40 CFR §264.55), ECs are selected based on their familiarity with:

- The Facility Layout
- The Contingency Plan
- Operations and activities at the facility
- Location and characteristics of the wastes handled
- Location of records within the facility

ECs have completed site training requirements, exhibit leadership qualities, and have completed USEI's probationary employment period. Training records and job descriptions of the EC and Alternate ECs are maintained at the facility for review.

This plan describes the actions ECs must or may carry out during any particular incident. The EC may delegate certain activities to other qualified facility personnel (e.g.; outside notifications may be delegated to the Environmental Manager or other qualified facility personnel).

### **G.3 Initiation of the Contingency Plan**

In accordance with IDAPA 58.01.05.008 (40 CFR §§264.52(a) and 264.56(d)), the decision to implement the Contingency Plan depends on whether or not an imminent or actual incident could threaten human health or the environment (e.g., release, fire or explosion). This paragraph provides guidance for making these determinations by specifying decision-making criteria to be used during the implementation of the Contingency Plan. The general response and implementation procedures to be used when an incident occurs and the potential notification requirements are outlined in Figures G-2 and G-3.

The EC can implement the Contingency Plan in full or in part to meet the needs of the particular incident. A full implementation is appropriate if outside assistance is needed from any emergency agency or if complete facility evacuation is warranted. The following situations require either partial or full implementation of the Contingency Plan:

- Fire and/or explosion:
  - A fire involving hazardous waste or hazardous materials that could threaten human health or the environment (Does not include small fires incidental to hot work permits or oxidation of gasses from hydrolysis during treatment).
  - The fire spreads and could possibly ignite materials at other locations on-site or could cause heat-induced explosions.
  - The fire could spread to areas outside the facility.
  - A danger exists that an explosion could occur.
  - A danger exists that an explosion could ignite other hazardous wastes at the facility.
  - A danger exists that an explosion could result in the release of toxic material.
  - An explosion has occurred.
  - Any fire or explosion requiring an off-site agency for emergency response.
- Spills or Material Release:
  - A spill that results in release of flammable liquids or vapors that could cause a fire or gas explosion hazard.

- The spill causes the release of toxic liquids or fumes that could threaten human health or the environment.
- The spill cannot be contained inside the facility.
- Any spill or material release that requires an off-site agency for emergency response.

A partial implementation is appropriate when the facility has the resources to address the situation without outside emergency resources in a timely fashion.

The EC implements the Contingency Plan and coordinates the activities of available personnel. All facility employees have received training in implementing the Contingency Plan. It is the responsibility of the individual who detects an incident at the facility to promptly contact a supervisor or the EC. When contacted, the supervisor will make a preliminary assessment of the situation and, if warranted, will promptly contact the EC. If the primary EC is unavailable, an alternate EC will be contacted (See Table G-1). In the event an emergency situation should arise, the EC is responsible for assessing the severity of the incident and implementing the Contingency Plan as required.

Should an incident occur after the normal working hours, the designated EC can implement the Contingency Plan, as appropriate, without being at the facility. To do this, the designated EC uses the observations of personnel and security officers who are at the facility to make preliminary determinations of the appropriate course of action.

## **G.4 Emergency Response Procedures**

### ***G.4.a Notification***

In accordance with IDAPA 58.01.05.008 (40 CFR §264.56(a)), upon the discovery of any imminent or actual emergency, the discoverer will promptly notify his supervisor, who will, as necessary, notify the primary EC (or his alternate when the primary EC is unavailable and/or the alternate is a more appropriate contact for the particular situation) of the situation. For afterhours incidents, the primary EC or his alternate is contacted. Specific notification procedures and requirements for the various types of incidents that would require implementation of this Contingency Plan are provided in the other portions of this plan. A facility map is available to assist personnel in providing necessary details to the EC available. If not immediately available at the facility, the ECs have the authority to issue preliminary decisions prior to arriving at the facility. The EC is responsible for contacting the necessary personnel (response team, cleanup crew, etc.) and instructing them how to proceed.

Supervisors of unaffected areas will generally stay with their personnel and be ready to evacuate and account for the personnel under their supervision.

Siren or other communication systems may be activated to notify facility personnel at the ECs discretion. In the event of a power outage, evacuation may be initiated using radios, and strobe lights. Radios are issued in sufficient numbers so that each employee either has a radio or is with an employee who has a radio, including heavy equipment operators. The radios are battery operated and not dependent on electrical power.

The EC will contact available supervisors to inform them of the incident. Normal site radio use may also be curtailed to facilitate Contingency Plan implementation. During active emergencies, administrative personnel are instructed to curtail routine business calls so the phone lines will remain open to handle emergency calls. Personnel are assigned to the access gates by the EC to control the access of persons during emergencies. The EC is responsible for contacting the appropriate federal, state, or local authorities if their assistance is required. The EC is also responsible for recording those incidents requiring activation of the Contingency Plan in the operating record.

Figures G-2 and G-3 depict the generalized sequence in which the EC, facility personnel, and appropriate Federal, state, and local agencies are to be contacted, respectively. Notification of the appropriate agencies is the responsibility of the EC. Pertinent phone numbers are listed in Tables G-2 and G-3.

If a release, fire, or explosion that could threaten human health or the environment outside the facility or that is beyond the facility's emergency response capabilities to control occurs, the EC is responsible for ensuring the appropriate persons/agencies are notified. The following information is typically given to the appropriate persons/agencies:

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

The EC is responsible for calling the Idaho Emergency Communication Center (IECC) to request activation of the Idaho Emergency Medical Services (EMS) system, if needed. Based on the type and severity of the reported injury, the IECC will contact the appropriate emergency service and medical facilities. The responding medical unit will direct medical emergency responses once they arrive at the scene. These responsibilities include assessment of the emergency and communication with medical facilities to ascertain which facility the injured person(s) are to be sent for treatment. The EC and medical personnel will evaluate chemical exposures and the need for personnel decontamination prior to leaving the facility. St. Alphonsus Hospital, located in Boise, Idaho, is the Regional Trauma Center. In the event of an emergency, however, the Idaho EMS will decide which hospital is best capable of treating injured persons. Figure G-4 provides general guidance procedures to be used in the event of an injury.

#### ***G.4.b Identification of Hazardous Materials***

In accordance with IDAPA 58.01.05.008 (40 CFR §264.56(b)) and in the event of a release, the EC will attempt to identify the character, exact source, amount, and areal extent of any release. The initial identification method will include visual inspection, if possible. Paperwork documentation, such as shipping Manifests, Internal Control Forms (ICF), Waste Profile Forms (WPF) and other available sources of information will also be reviewed. Additionally, USEI maintains a database at the site and the corporate office, which allows information to be gathered from two separate locations.

Certain wastes that come into the facility are bulk liquids or solids. Should a problem occur during the unloading, storage, treatment, stabilization, or disposal of these wastes, the material can be identified by the WPF numbers and ICF's associated with these wastes. Bulk wastes unloaded and disposed of within a landfill can be identified using waste disposal records.

Wastes in containers can be identified at the time of their unloading by WPF numbers, during storage by the ICFs and, finally, by their position in the landfill area as indicated in the waste location records.

Wastes being treated in surface impoundments can be identified by manifests and WPF numbers at the time of their deposition and, subsequently, by ICFs.

Wastes being treated or stabilized can be identified by WPF numbers, waste characterization review information, and manifests. Inventory records are maintained for all wastes stored at the facility.

Samples will be taken in accordance with the Waste Analysis Plan (WAP), for chemical analysis if there is a release of materials from containers, tanks, stabilization areas, disposal areas, or surface

impoundments that cannot be identified from existing records. Personnel who may have knowledge of the materials involved will be interviewed as necessary.

### **G.4.c Assessment**

In accordance with IDAPA 58.01.05.008 (40 CFR §§264.56(c) and 264.56(d)), the EC will assess possible hazards, both direct and indirect, to human health or the environment. This assessment will be based on:

- The character of the released material(s)
- The exact source of the released material(s)
- The amount of the released material(s)
- A determination of the areal extent of the released material(s)
- An assessment of the possible hazards to human health and the environment

The information used in making assessments may include:

- EC observations
- Reports from facility personnel
- Manifests
- Operating logs
- Operation records
- Waste characterization data
- Miscellaneous sources of information and response assistance maintained at the facility

Once the area of involvement is identified, the EC will acquire and review the appropriate facility records of the wastes stored or disposed at the site location, including waste analyses, manifests, and other pertinent data, as needed.

Based on this information, the EC will assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment will consider both direct and indirect effects of the release, fire, or explosion (including the effects of any toxic, irritating, or asphyxiating gases that are generated), of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions, of the possibility of heat-induced explosions and spreading fire, and of the potential exposures of personnel to hazardous materials while attempting to control a fire.

All spills and leaks of hazardous waste greater than the minimum reportable quantity of releases (as defined in 40 CFR §302.4) will be reported to the Idaho Department of Environmental Quality (IDEQ) and NRC within 24 hours.

If the EC determines the facility has had a release or explosion which could threaten human health or the environment and deems that an evacuation is necessary, he will contact the appropriate local authorities (see Table G-2) and proceed with evacuation procedures as further addressed in paragraph G.7 of this Section.

### **G.4.d Control Procedures**

In accordance with IDAPA 58.01.05.008 (40 CFR §264.52(a)), potential releases fall under two general classifications: fire/explosions and spills/releases of materials. Natural disasters such as earthquakes or tornadoes could also result in implementation of the Contingency Plan by causing an event that would fall into one of these two classifications. Because of the facility's location and elevation, inundation by flood is not a probable threat. Run-on and run-off from precipitation events are controlled by a system of dikes, ditches, swales, and collection ponds. Site drainage plans for the complete drainage system have been reviewed by USEPA and IDEQ. The subsections that follow discuss specific control procedures utilized in

the event of a fire, explosion, or material spill/release. In all emergency procedures, the initial response is to first protect human health and safety, then protect the environment. Identification, containment, treatment, and disposal assessment are subsequent phases to the contingency implementation process.

#### **G.4.d.(1) Fire and/or Explosion**

Response personnel will be on standby during all facility emergencies. If a response to a fire occurred, remote firefighting efforts will concentrate on preventing the fire from spreading to nearby areas. During nonworking hours (evenings, holidays, weekends), the Response Team will be contacted at home. The Mountain Home Air Force Base may also be contacted to provide backup fire protection. In the event of a fire, USEI's Response Team will only utilize minimal remote fire suppression techniques as appropriate in order to protect the health and safety of the response crew. Figure G-5 outlines the procedures to be used in the event of a fire.

All areas for loading, off-loading, treatment, storage, and disposal are readily accessible by fire-fighting and other emergency vehicles and equipment. The roads leading to the storage, treatment and landfill areas are kept clear of obstructions.

The following general procedures are used for rapid and safe response and control of fire/explosion situations. When an employee discovers a fire or explosion or a situation that could lead to either of these events (spill of flammable material, etc.), they will report it to their supervisor or the EC. When contacted, the EC is responsible for obtaining the following information:

- The area of the fire and/or explosion or the unsafe condition
- The materials involved and the intensity of the fire or explosion if they have occurred
- Any personnel injuries

The following actions will be taken in the areas affected by the fire or explosion:

- Work in all potentially impacted areas will be immediately terminated.
- Complete evacuation of the affected area will be initiated if a threat to human health is possible.
- Medical attention will be obtained for any injured person(s) through Idaho EMS.
- The emergency alarm warning system (siren system, strobe light system), as necessary, will be used to notify site personnel of an emergency condition if it requires site evacuation. This signal also indicates to employees that 2-way radios will be used only for emergency communication and that all facility personnel who are involved with emergency response should turn on their radios at this time. Also, "EMERGENCY" will be called three (3) times over the 2-way radios to provide an open communication line for emergency use.
- If safe to do so, operating equipment will be shut down, feed lines and additional equipment will be shut down, and nearby containers will be removed or isolated.
- If necessary, the area will be cleared of personnel not actively involved in fire suppression. For site evacuation, these persons will report to the designated rally points for accountability. Rally points are designated in Figure G-7. The figure shows that several rally points are established around the site so an area upwind of the fire is available. Additional personnel safety equipment will be distributed if needed.
- If safe to do so, injured persons will be removed from the area and medical treatment will be administered by qualified personnel.
- As appropriate, facilities will be inspected for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment where appropriate and safe to do so.
- Fires may be suppressed with water, soil, dry chemicals, CO<sub>2</sub>, or foam. Heat-exposed containers will be cooled with water spray and removed from the fire, if appropriate and possible.  
Warning/Caution: If a rising sound comes from a venting device or a tank begins to discolor, withdraw from the area immediately. (Possible Boiling Liquid/Expanding Vapor Explosion).

- IECC will be called if a fire cannot be controlled or is too dangerous for facility personnel (as determined by EC).

Based on the severity of the fire, the potential for injury to personnel, and the materials involved, the EC will determine if fire suppression activities can be safely accomplished by USEI personnel. The EC is responsible for assessing all fire-fighting efforts.

The EC will determine when the fire emergency has passed and will consult with other facility personnel, as appropriate, before the "all clear" message is sent. The "all clear" message will be communicated to facility personnel via two-way radios or verbally when the fire has been extinguished and the personnel are no longer endangered. All required dedicated equipment used in the emergency will be cleaned and prepared for use prior to being placed back in service as required by IDAPA 58.01.05.008 (40 CFR §264.56(h)(2)).

#### **G.4.d.(2) Spill or Material Release**

The following general procedures outline rapid and safe response for the control of spills or material release situations. Figure G-6 outlines the procedures. When an employee discovers a hazardous chemical spill or process upset resulting in a release, he will immediately report it to his supervisor or the EC. When contacted, the designated EC will attempt to obtain the following information:

- Location of the release or spill of hazardous material
- The identity, properties, and characteristics of the material spilled or released
- The direction in which the spill, vapor, or smoke release is heading
- An estimate of the quantity released and/or the rate at which it is being released.
- Any injuries involved

This information is used to assess the magnitude and potential seriousness of the spill or release. If the spill or release is within the facility's emergency response capabilities, the EC will contact and deploy the necessary facility personnel. The EC will contact the appropriate agencies for assistance and reporting.

Because fire is always a potential hazard in spills of flammable materials, possible sources of ignition near the fire will be eliminated, whenever possible. Vehicular traffic will be directed away from the area to avoid ignition of the vapor. Routine work in the area will cease until the spill is contained and safety is restored. If spilled materials are flammable and pose a threat of fire, response personnel may respond with foam equipment and hoses for vapor suppression. If advised by the EC, the spill may be flushed with large quantities of water or foam. Materials will be contained and collected for proper treatment and disposal.

If the chances of an impending explosion are high, an appropriate area will be evacuated as determined by the EC. The closest local residence is approximately 1 mile from the site. Therefore, a release of even highly flammable material should not threaten local residences with any danger of fire.

Isolation distances and evacuation requirements are dependent on the nature and magnitude of the spill. Small and large spills are defined using the 1996 edition of the North American Emergency Response Guidebook. A small spill is one which involves a single small package (i.e., up to a 55-gallon drum), a small cylinder, or a small leak from a large package. A large spill is one which involves a spill from a large package (i.e., greater than a 55-gallon drum) or multiple spills from more than one package.

The Contingency Plan will be activated for all spills that could directly threaten human health or the environment. The Contingency Plan may not be activated for small spills that do not exceed reportable quantities (as defined in 40 CFR §302.4) and do not pose a threat to human health or the environment. *De minimis* losses include those from normal material handling/processing operations (e.g., loading and unloading, or leaks from pipes) or other facility operations; these small losses are handled as part of the

normal site operations and do not require implementation of the Contingency Plan. Spills and releases into secondary containment are generally not considered to pose a threat to human health and the environment and do not generally require implementation of the Contingency Plan.

The following actions will be immediately taken in the areas affected by a spill or release:

- Initiate complete evacuation of the affected area if a threat to human health is possible
- Clear radio by calling "EMERGENCY" three (3) times over the radio.
- Obtain medical attention for any injured person(s) through IEMS.
- Dispatch emergency personnel to the site to take the appropriate action as needed.
- Contact the proper authorities if the uncontained spill or release directly threatens human health or the environment outside of the facility. Contact the IECC first so that, if necessary, persons downwind or downgradient of the spill or release can be notified and, if necessary, evacuated. If a large spill occurs, the initial evacuation area downwind will depend on the nature and volume of the material spilled. Evacuation distances established by the latest edition of the North American Emergency Response Guidebook will be referenced where applicable. A copy of this guidebook is kept at the facility for use in the event of an emergency. The EC will use this guidebook or other appropriate guidebooks as a reference for determining safe evacuation distances for spills or releases.

Emergency response personnel will address spills and releases as follows:

- Put on protective clothing and equipment.
- Once the area can be safely accessed, remove all injured and unnecessary persons from the hazard area.
- Use 2-way radios for emergency-related communication only.
- If a flammable waste is involved, remove all ignition sources, and use spark and explosion-proof equipment and clothing in containment and cleanup.
- If applicable and can be safely attempted, stop the leak and/or eliminate the feed source via valves, fittings, pumps, barriers, dikes, engineering controls, and/ or other appropriate methods.
- In the event of an uncontrolled leak or spill in the tank or treatment areas, close all feedlines to the affected unit.
- As soon as practical after the spill is detected, initiate removal of standing liquids. Treat and dispose of cleanup materials in an appropriate fashion, in accordance with the WAP.
- Remove surrounding materials that could be dangerously reactive with materials in the spill or release. Determine the major and hazardous components in the spilled or released material.
- Contain, divert, and/or absorb spills not contained by dikes or sumps. Spills contained within the dike or sump can be pumped into an appropriate storage tank, drum, or tank truck.
- Where applicable, neutralize spilled material with the appropriate reagent.

#### **G.4.d.(3) Power Outages/Equipment Failures**

Response to power outages are area specific. If the power outage is facility wide, the first consideration is the communications systems. The phone system will be checked. If the phone system is not active, then the radio-phone or cellular phones systems will be checked to determine if they are working.

The internal radio and alarm systems will also be checked. For internal areas where lighting is critical to operations, emergency lighting will be provided or operations will be suspended. In the case of the Containment and Stabilization Buildings, emergency lighting is provided by a battery-powered emergency power system that provides approximately 1½ hours of backup power. This lighting is sufficient for evacuation, shut down of the building/equipment, and for limited continued operations (if approved by the EC and within permit limitations). If additional lighting is needed for safe operations, then portable, self-powered light facilities will be used.

Power outages occur periodically at the facility and do not present an emergency condition unless they create or exacerbate other incidents. A power outage within the Containment Building that affects the air pollution control system (e.g. baghouses) will restrict the treatment of certain wastes (e.g. K061). Back-up power in the form of portable generators are available for certain uses during a power outage.

#### ***G.4.e Prevention of Recurrence or Spread of Fires, Explosions, or Releases***

Actions to be taken to prevent the recurrence or spread of fires, explosions, or releases include shutting down processes and operations, collecting and containing released waste, and/or recovering or isolating containers. If the facility stops operations in response to an emergency, site personnel will monitor valves, pipes, and other equipment for leaks, pressure buildup, gas generation, or ruptures, as necessary, practical, and safe. General inspection requirements are used as guidelines for these activities. Any areas that appear to have the potential for ignition of a fire or explosion will be isolated (if possible) and contingency procedures as described in paragraphs G.4.d.(1) and G.4.d.(2) of this Section will be considered.

#### ***G.4.f Storage and Treatment of Released Material***

The EC will make proper arrangements for treatment, storage, or disposal of recovered waste, contaminated soil, water, or any other contaminated material as soon as practical after a release or spill. Waste management activities conducted at the facility will be in accordance with the WAP.

#### ***G.4.g Incompatible Waste***

Wastes that are incompatible with the released material will not be treated, stored, or disposed in the affected area until decontamination procedures are complete, to the extent necessary. This will be accomplished by checking the existing WPFs, laboratory data, and/or manifest data to determine the type of material and its compatibility category. Data and procedures described in the WAP will be utilized in making compatibility determinations.

#### ***G.4.h Post-Emergency Equipment Maintenance***

All emergency equipment utilized will be cleaned, and all damaged equipment will be repaired or replaced after an emergency event. Examples of various washing solutions are presented in Table G-4. An inspection of all utilized emergency equipment required by this Contingency Plan will be conducted before normal operations are resumed in the affected areas. When there has been full implementation of this Contingency Plan, IDEQ will be notified that cleanup and post-emergency equipment maintenance have been performed in accordance with IDAPA 58.01.05.008 (40 CFR §264.56 (h) and (i)) before operations are resumed in the affected area(s) of the facility (see paragraph G.8 of this Section for reporting requirements).

### **G.5 Emergency Equipment**

In accordance with IDAPA 58.01.05.008 (40 CFR §264.52(e)), the facility maintains equipment necessary for emergency situations. A list of examples of facility emergency equipment is located in Table G-5. The following safety and emergency items and equipment are typically available at the facility:

- Two-way radios
- Off-site telephone communications

- Additional off-site communications devices include a radio communication network, and a battery-powered radio-telephone, or cellular phone
- Decontamination supplies (refer to Tables G-4 and G-6)
- First aid kits, including eye washes and oxygen units, are available at the site. Showers are also available at the site.

Emergency eyewash fountains and showers are located in the process/storage buildings and in the laboratory.

Fire extinguishers are available at numerous locations throughout the facility. These portable fire extinguishers are primarily dry chemical types A, B, and C. Type A is capable of extinguishing fires involving ordinary combustible materials such as wood, cloth, paper, rubber, and many plastics. Type B is capable of extinguishing fires involving flammable liquids, oils, greases, tars, oil-base paints, lacquers, and flammable gases. Type C is capable of extinguishing fires involving energized electrical equipment. All extinguishers comply with National Fire Code standards for portable fire extinguishers. They are inspected after each use (or at least monthly) and recharged as necessary. Records of these inspections are kept in the operating log.

PPE maintained at the facility includes protective suits, gloves, boots, goggles, hard hats, face shields and half-face and full-face air purifying respirators. Airline respirators and self-contained breathing apparatus (SCBA) are also available at the facility. The personal protective equipment (PPE) is readily available for implementation of contingency response procedures.

Water is available at the facility in case of emergencies. Soil is also available for emergency fire control and for use as an absorbent material for containment of spills or leaks. Storage tanks are available at the facility to supply water for a fire emergency. This water may be delivered to the scene with appropriate equipment (e.g. site water truck, etc.)

## G.6 Coordination Agreements

In accordance with IDAPA 58.01.05.008 (40 CFR §§264.52(c), 264.37), written working agreements are already in existence between USEI and the organizations shown in Table G-3.

In accordance with IDAPA 58.01.05.008 (40 CFR §264.53(b)) copies of the Contingency Plan are provided to all of the organizations listed in Table G-7 to alert them to the fact that the facility treats, stores, and disposes of hazardous wastes and that the potential exists for injuries relating to chemical exposures, burns, respiratory distress, etc.

In compliance with IDAPA 58.01.05.008 (40 CFR §§264.37(b) and 264.52(e)), it is USEI's understanding that the local authorities (i.e., Owyhee Sheriff's Department) will respond and provide services to emergency incidents involving hazardous materials as the incident dictates. It is also expected that emergency response services will be available from U.S. EPA and the Idaho Department of Environmental Quality in accordance with IDAPA 58.01.05.008 (40 CFR §264.37(a)(3)). Since these agencies must be notified of emergency situations or have teams and individuals that routinely respond to hazardous materials spills, no special agreement is needed for these services. USEI has sent notification letters to various emergency response agencies.

Coordination/contact with emergency response agencies and services may be handled through contact with the IECC dispatcher at 1-800-632-8000.

## G.7 Evacuation Plan

In accordance with IDAPA 58.01.05.008 (40 CFR §264.52(f)), in the event of an emergency that could threaten human health or the environment as described herein, it will be necessary to follow an established set of procedures. These procedures will be followed as closely as possible; however, in specific emergency situations, the EC may deviate from the procedures to provide a more effective plan for bringing the situation under control. The EC is responsible for determining which emergency situations require facility evacuation.

The facility employs a warning system with a specific alarm signal to initiate evacuation of facility areas. The warnings are a long blast on the siren system, activation of the strobe lights, and a verbal evacuation order on the radio. The radios are issued to personnel throughout the facility and are not dependent on alternating current electrical power. The siren and strobe light key switches are located on the north end of the administration trailer. The alarm system can also be controlled from anywhere on the facility from the EC's radio by using a key pad code.

In addition to the alarm, two-way radios and the internal telephone system may be used to notify key facility personnel of the nature of the emergency and the recommended plan of action. Telephones can also be used to summon aid in emergency situations. Employees are trained to respond to the alarm signals. Total facility evacuation can only be initiated by the EC.

Evacuation routes and rally points for the facility are shown in Figure G-7. These routes are as follows:

- Route No. 1 - Main Entrance Lemley Road
- Persons evacuating by this route will proceed south and east to the main gate. They will rally outside the main gate. If this is not feasible, the evacuation gate at the SE corner (Gate A) will be used as an alternate.
- Route No. 2 - Gate B
- Persons evacuating by this route will proceed south and west through Gate B and then to the rally point near that gate.
- Route 3 - Gate C<sub>1</sub>
- Persons evacuating by this route will proceed north and west through Gate C<sub>1</sub> and then to the rally point near that gate. If this is not feasible, the evacuation gate at the NW corner (Gate C) will be used as an alternate.
- Route 4 - Gate D
- Persons evacuating by this route will proceed north and east through Gate D and then to the rally point near that gate.

Gates A, B, C, C<sub>1</sub>, and D will normally be locked with a key lock. The key to these locks is contained in a sealed box next to the gate. Evacuees will break the seal, take the key, and unlock the gates.

In the event facility evacuation is called for by the EC, the following actions will typically be taken:

- The alarm signal for facility evacuation will be activated.
- No further entry of unnecessary visitors, contractors, or trucks will be permitted. Vehicular traffic within the facility will cease.
- Site personnel, visitors, and contractors will leave through the exit gates (see Figure G-7 for general evacuation routes), except for properly equipped employees who may be assigned to control access through the gates.
- No persons will be allowed to remain in or re-enter the area unless specifically authorized by the EC. Those within the fenced area will normally include only the fire brigade/emergency response and authorized emergency response personnel.
- Site personnel will be accounted for by area. Supervisors may designate certain gates as the safest exits for employees and may identify an alternate exit if the first choice is inaccessible. To

assist in the endeavor, the EC will use the internal telephone/radio system to contact the area supervisors and update them of the nature of the emergency.

- Rally points for specific routes are shown on Figure G-7. Immediately upon exiting through a gate, the first person from each work area will begin preparing a list to determine if all personnel by area have been evacuated. Master lists of employees and work areas are kept on file at the security building.
- Upon completion of the employee list, the list will be conveyed to the EC. Personnel will remain at their assigned rally points until the “all clear” signal is given.
- Contract personnel and visitors shall be listed with the name of their company.
- The names of emergency team members involved in emergency response will be determined by the EC.
- A final accounting of personnel will be made by the EC.
- An updated list of all personnel will be maintained to aid in the accountability procedure. Employees will prevent entry of any unauthorized persons into the facility.
- Re-entry will be made only after the “All clear” signal is given by the EC. At the EC’s direction, a signal or other notification will be given for re-entry into the facility.
- In all questions of accountability, immediate supervisors will be held responsible for those persons reporting to them. Visitors will be the responsibility of those employees admitting the visitor to the facility. Contractors are the responsibility of those persons administering the individual contracts. Truck drivers are the responsibility of the area supervisor where the truck is loading/unloading. Employees will be assigned to aid in accounting for visitors, contractors, and truckers by reference to the sign-in sheets.
- Drills will be held annually, at a minimum, to practice emergency evacuation.

If the EC’s assessment of the situation indicates that evacuation of local areas may be advisable, he will immediately notify the Owyhee County Sheriff either directly or through the IECC. The EC will be available to help appropriate officials decide whether local areas should be evacuated. The Owyhee County Sheriff will notify the local population in accordance with the Owyhee County Notification Plan.

## **G.8 Required Reports**

As required by IDAPA 58.01.05.008 (40 CFR §264.56(i)), any emergency event (e.g., fire, explosion, etc.) that requires implementation of the Contingency Plan will be reported in writing within 15 days to the IDEQ. A report format for emergency events is shown in Table G-8. Additionally, an immediate notification to the Owyhee County Sheriff’s Office through EMS and the National Response Center will be made as required in IDAPA 58.01.05.008 (40 CFR §264.56(d)) whenever there is a release, fire, or explosion that could directly threaten human health or the environment outside the facility. Notations of the time, date, and details of any emergency incident that requires implementation of the Contingency Plan will be entered into the facility operating record.

## **G.9 Amendments to the Contingency Plan**

The Contingency Plan will be reviewed and updated and/or amended, as necessary, whenever the following occurs:

- The facility permit is revised.
- The Contingency Plan fails in an emergency.
- The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous wastes or hazardous waste constituents, or where there are changes in the responses necessary in any emergency.
- The list of ECs changes.

- The list of emergency equipment changes.
- There are relevant changes in the requirements of IDAPA 58.01.05.008 (40 CFR Part 264).

At a minimum, the Contingency Plan will be reviewed annually and amended and/or updated (as needed). Plan revisions are recorded, and copies of the revisions are sent by the EC to the organizations listed in Table G-7.

**Table G-1 Emergency Coordinators<sup>1</sup>**

NAME	TITLE	HOME ADDRESS	PHONE NUMBER
Primary Emergency Coordinator: Wade Roberson	Operations Manager	260 Estate Drive Grand View, ID 83624	(208) 599-2654 home (208) 834-2275 office
Alternate Emergency Coordinator 1: Rich Theodozio	Senior Operator	2553 South Hayland Rd. Grand View, ID 83624	(208) 834-2697 home (208) 834-2275 office
Alternate Emergency Coordinator 2: Mae Beaver	Shift Supervisor	175 West 12 <sup>th</sup> North Mountain Home, ID 83647	(208) 587-5613 home (208) 834-2275 office
Alternate Emergency Coordinator 3: Rick Pollard	Senior Field Technician	850 Riverside Grand View, ID 83624	(208) 350-7342 home (208) 834-2275 office
Alternate Emergency Coordinator 4: Noel Bailey	Technical Manager	4298 East Thomas Mill Drive Nampa, ID 83686	(208) 250-2749 home (208) 834-2275 office
Alternate Emergency Coordinator 5: *Andy Moreno	RTF Foreman	1010 East 6 <sup>th</sup> South Mountain Home, ID 83647	(208) 890-1629 home (208) 385-7756 office
Alternate Emergency Coordinator 6: *Justin Spencer	RTF Supervisor	1868 W. Sahara Dr. Kuna, ID 83634	(208) 283-8138 home (208) 385-7756 office

\* Do not contact in the event of a Site B emergency.

1. This list is reviewed annually and revised as necessary.

**Table G-2 Emergency Contacts<sup>1</sup>**

Emergency	Organization/Agency <sup>2</sup>	Phone Number
<b>Any Emergency</b>	Idaho Emergency Communications Center	800-632-8000
	Family Practice/Occupational Medicine Associates	208-367-4197
	St. Alphonsus Hospital (Emergency)	208-367-3221
	St. Alphonsus Medical Center, Nampa	208-463-5100
	Owyhee County Sheriff	208-495-1154
	Grand View EMT	800-632-8000
	St. Luke's Elmore Hospital	208-587-8401
<b>Fire/Explosion</b>	Idaho Emergency Communication Center	800-632-8000
	National Response Center	800-424-8802
	Boise Fire Dispatch Center	208-384-3400
	Mountain Home Air Force Base	208-828-6292 or 208-828-6005
	Grand View Fire Department	911
<b>Poison Information, Hazardous Material Spill or Release</b>	Poison Information Center [Rocky Mountain Poison and Drug Center]	800-222-1222
	Idaho Emergency Communication Center	800-632-8000
	National Response Center	800-424-8802
<b>If Spill Reaches Navigable Waters</b>	U.S. EPA Region 10	206-553-1263
	U.S. Coast Guard	800-982-8813
	National Response Center	800-424-8802
<b>National Disaster</b>	Idaho Emergency Communication Center	800-632-8000

<sup>1</sup>This information is reviewed annually and revised as necessary.

<sup>2</sup>Other agencies may be contacted as appropriate.

Note: The Idaho Emergency Response Communications Center (aka StateComm) may be contacted in any emergency event, if necessary. It will coordinate the proper agencies or organizations as needed. StateComm can also be contacted on an EMS radio Frequency 2 (155.280).

**Table G-3 Current Response Agreements and Phone Numbers**

Agency Name	Type of Service	Emergency Phone Number
Idaho EMS System	Communications	800-632-8000
Idaho State Police	Law Enforcement	208-846-7500
Elmore County Sheriff Dept.	Law Enforcement	208-587-2121
Owyhee County Sheriff	Law Enforcement	208-495-1154
Owyhee County Disaster Services	Disaster Services	208-495-1154
US EPA, Boise, Idaho	EPA NCP Response	800-632-8000
Idaho DEQ Boise, Idaho	Idaho NCP Response	800-632-8000
Bureau of Land Management	Fire Fighting	208-384-3400
Family Practice Associates <sup>1,2</sup>	Medical	208-367-4197
St. Alphonsus Medical Center, Nampa <sup>2</sup>	Hospital/ Medical	208-463-5100
St. Alphonsus Medical Center <sup>2</sup>	Hospital/ Medical	208-367-3221
St. Lukes Elmore Hospital	Hospital/ Medical	208-587-8401
Grand View Ambulance	Ambulance/ EMT	800-632-8000
Mountain Home AFB	Fire Fighting	208-828-6292
Idaho State Fire Marshall/ Idaho State Insurance	Fire Fighting	208-334-4370

<sup>1</sup>Indicates phone numbers that are NOT 24-hour phone numbers and are effective only during the normal working day.

<sup>2</sup>These groups provide only supplies, technical information, or contracted services and are not holders of the Contingency Plan. They will be specifically briefed as needed if their services are required.

Abbreviations used:

- EMS - Emergency Medical Services
- EMT - Emergency Medical Technician
- EPA - Environmental Protection Agency
- IDEQ- Idaho Department of Environmental Quality
- NCP - National Contingency Plan

**Table G-4 General Purpose Decontamination Solutions<sup>1</sup>**

Type of Hazard Suspected	Solution	Directions For Preparation
1. Inorganic acids, metal processing wastes	A	To 10 gallons of water, add approximately 4 pounds of sodium carbonate (soda lime) and approximately 4 pounds of trisodium phosphate. Stir until evenly mixed.
2. Heavy metals: mercury, lead cadmium, etc.	A	Same as item 1.
3. Pesticides, fungicides, chlorinated phenols, dioxins, and PCBs	B	To 10 gallons of water, add approximately 8 pounds of calcium hypochlorite. Stir with wooden or plastic stirrer until evenly mixed.
4. Cyanides, ammonia, and other nonacidic inorganic wastes	B	Same as item 3.
5. Solvents and organic compounds such as trichloroethylene, chloroform, and toluene	C (or A)	To 10 gallons of water, add approximately 4 pounds of trisodium phosphate. Stir until evenly mixed.
6. PBBs and PCBs	B	Same as item 3.
7. Oily, greasy unspecified wastes	C	Same as item 5.
8. Inorganic bases, alkali and caustic waste	D	To 10 gallons of water, add 1 pint of concentrated hydrochloric acid. Stir with a wooden or plastic stirrer.

<sup>1</sup>Not for use on personnel.

**Table G-5 Examples of USEI Facility Emergency Equipment**

Emergency Category	Equipment Description	Quantity	Equipment Location	Equipment Capability
<b>Alarm System</b>	Civil Defense Alarm System	1	Deck end of trailer south of receiving office entrance	Capable of activating emergency response teams, alerting employees that an emergency has occurred, and initiating site evacuation.
	Strobe	3	Inside Stab., Debris, and Pad 7	
<b>Facility Communications</b>	Two-way Mobile Radio	Numerous	All of these pieces of communications equipment are located on-site.	Two-way radios are capable of providing communications between employees.
	Commercial Phones	1		Phone lines are capable of communicating with outside emergency response agencies (e.g., County Sheriff).
	Cellular Phones	1		
<b>Fire Extinguishing Equipment</b>	Dry Chemical Extinguishers 125 lb BC, wheeled	3	Pad 4, PCB Building and in front of Lab Building	Capable of extinguishing Class B and C fires.
	Portable Fire Extinguishers, ABC	Numerous	Throughout site in equipment and buildings	Capable of extinguishing Class A, B, C, and D fires.
	Water tank truck (3,500 gallon)	1	Parked on site not in use.	
<b>Mobile Equipment</b>	Loaders	1	Parked on site when not in use elsewhere	Capable of moving dirt for diking and smothering fires.
	Bulldozers	1	Parked on site when not in use elsewhere	Capable of moving dirt for diking and smothering fires.
	Drum Handling Equip.	1	Parked on site when not in use elsewhere	
	Vacuum/Dump Trucks	1	Parked on site when not in use elsewhere	Capable of moving bulk materials, such as dirt, lime, rock and other materials as needed.
<b>Spill Control Equipment</b>	Empty 55 gallon drums	10	Stored adjacent to Pad 4, 5 or 7	
	Empty 85 gallon drums	4		
	Floor-dry or equivalent	1,000 lbs	Pads 4, 5 and 7	Capable of absorbing and diking various

Emergency Category	Equipment Description	Quantity	Equipment Location	Equipment Capability	
				chemicals.	
	Generator - Honda 110/220 V, 6.5KW	1	Maintenance shop when not in use elsewhere	Capable of providing electrical power for emergency use of lights, phone, pumps, etc.	
	Generator - Diesel 220V	1	Parked on site when not in use elsewhere		
	Impact wrenches (Air)	1	Maintenance shop or supply room when not in use elsewhere	Capable of a variety of uses that may arise in an emergency. Containers or tanks may be opened, patched, cut, stabilized as needed.	
	Barrel cutters (Manual)	1			
	Acetylene torch	1			
	Arc welder	1			
	Air compressors	1			
	1-inch impeller pump	1	Maintenance shop when not in use elsewhere	Capable of pumping liquids from the ground, tanks, drums, etc.	
	1½-inch diaphragm pump	1			
	4-inch centrifugal pump	1			
	Pneumatic drum pump	1			
	Hand Drum pump	1			
	Safety and Test Equipment	Photo Ionization Detector with VOC, O <sub>2</sub> , LEL	1	Safety Manager's office when not in use	Capable of use in making initial determination of the nature and extent of chemical releases, and in detecting presence and quantity of chemical/explosive vapors.
		Sample air pump with colorimetric tubes	1	Laboratory	
Portable Eyewash Stations		Numerous	All Operational Areas & Rescue Van	Capable of use for flushing eyes and body as needed in the field.	
Fire blankets		1	Women's Decon	To smother fire as needed.	
Oxygen resuscitators		1	Lunchroom	For use as needed and prescribed.	
Emergency shower/eyewash		1	Laboratory	To shower and decontaminate/clean personnel as needed.	
Showers		9	Clean-room facilities		
EMT Jump Kit		1	Lunchroom	Capable of providing materials or general first aid response in	

Emergency Category	Equipment Description	Quantity	Equipment Location	Equipment Capability
				the event of injuries or acute, chemically caused injuries.
	Scoop stretcher	1	Rescue Van	
	Stretcher	1	Women's Decon	
	Industrial first aid kits	1	Women's Decon	
<b>Decontamination Solutions</b>	See Table G-6		Laboratory/firehouse or safety supply room	
<b>Personal Protective Equipment</b>	Air-line with bottle and/or Air pack (30 minute)	4	Firehouse or Rescue Van when not in use	Capable of providing level A/B respiratory protection for personnel exposed to hazardous chemicals/constituents.
	Splash suits	4	PPE is maintained in the safety supply room or firehouse and distributed to personnel.	Capable of providing splash and skin protection to individuals handling hazardous chemicals or constituents
	Safety glasses	4		
	Butyl/neoprene/PVC gloves	4		
	Full-face respirators	4		

**Table G-6 Typical Inventory of Decontamination Reagents Maintained at the Facility**

Reagent	Minimum Quantity
Sodium carbonate	10 pounds
Trisodium phosphate	20 pounds
Concentrated hydrochloric acid	1 gallon
Calcium hypochlorite	20 pounds

- Equipment decontamination supplies kept in the maintenance shop, laboratory building or fire house which include the items shown in Table G-6.

**Table G-7 Contingency Plan Distribution List**

Copy No.	Title/Organization
1	USEI EC's and Management
2	Senior Hazardous Materials Specialist - Boise/DEQ
3	Air and Hazardous Waste Team Leader, U.S. EPA - Boise
4	Hospital Administrator/St. Lukes Elmore Hospital – Mountain Home, Idaho
5	Grand View Fire Department – Grand View, Idaho
6	Owyhee County LEPC – Grand View, Idaho
7	Elmore County LEPC – Mountain Home, Idaho
8	Owyhee County Library - Grand View, Idaho

### Table G-8 Reporting Format for Emergency Events

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Name, address, and phone number of owner or operator

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Name, address, and phone number of facility

---

Date, time, and type of incident (e.g., fire, explosion, etc.)

---

Name and quantity of material(s) involved

---

Extent of injuries (if any)

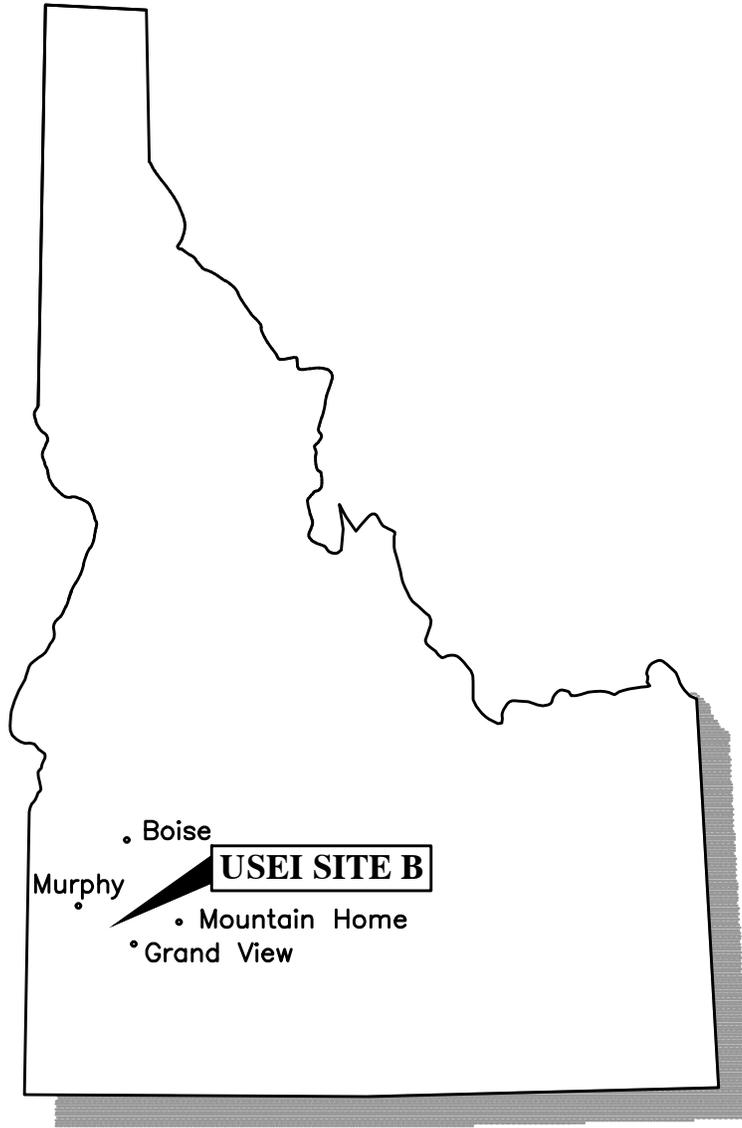
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Assessment of actual or potential hazards to human health or the environment

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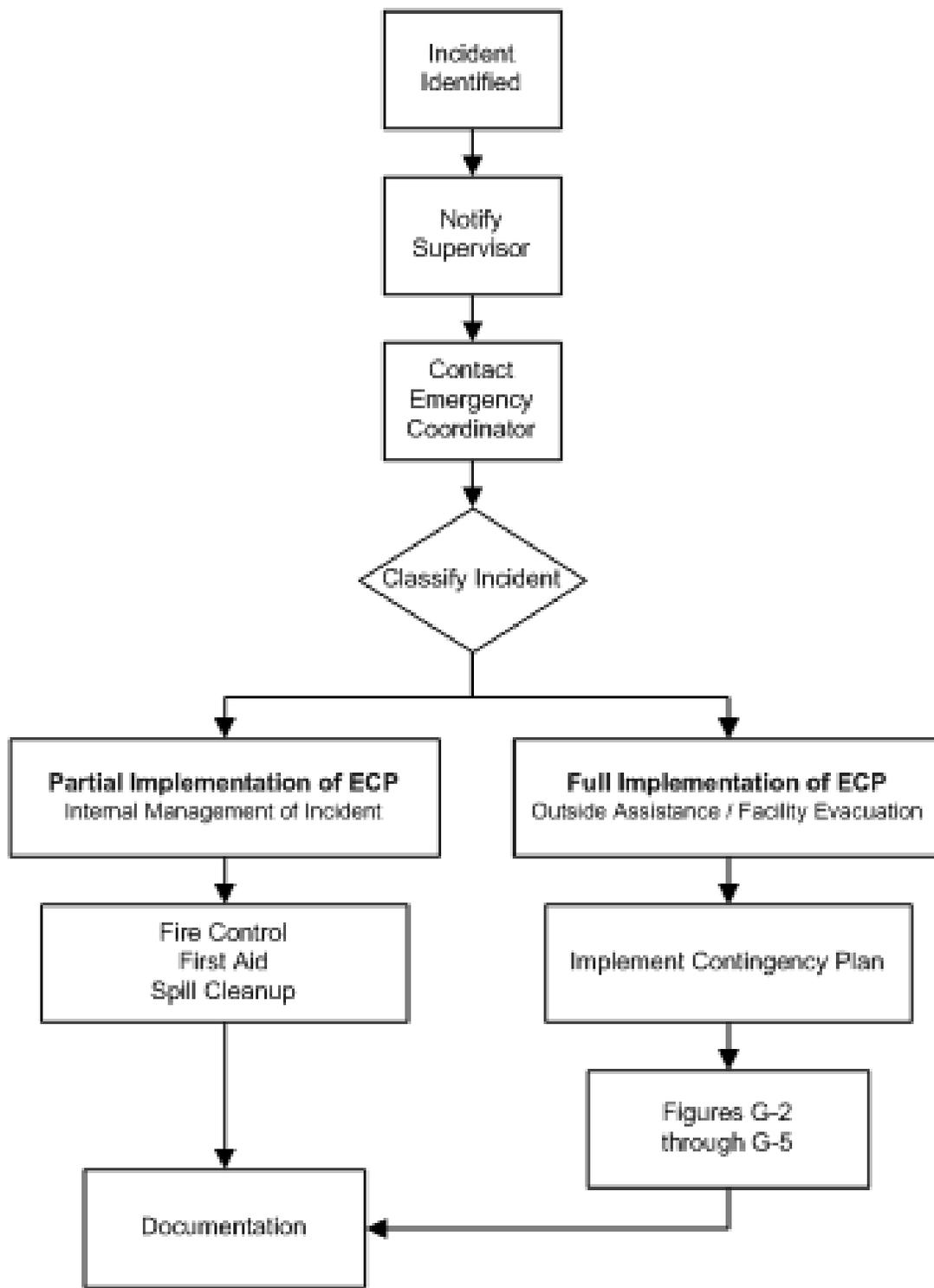
Estimated quantity and disposition of material recovered from the incident

USEI 2014 Permit Renewal Application  
EPA I.D. No. IDD073114654  
Date: May 1, 2014



**FIGURE G-1  
LOCATION OF USEI  
SITE B FACILITY**

Figure G-2 – Implementation of Emergency Contingency Plan



**Figure G-3 – Notification Requirements**

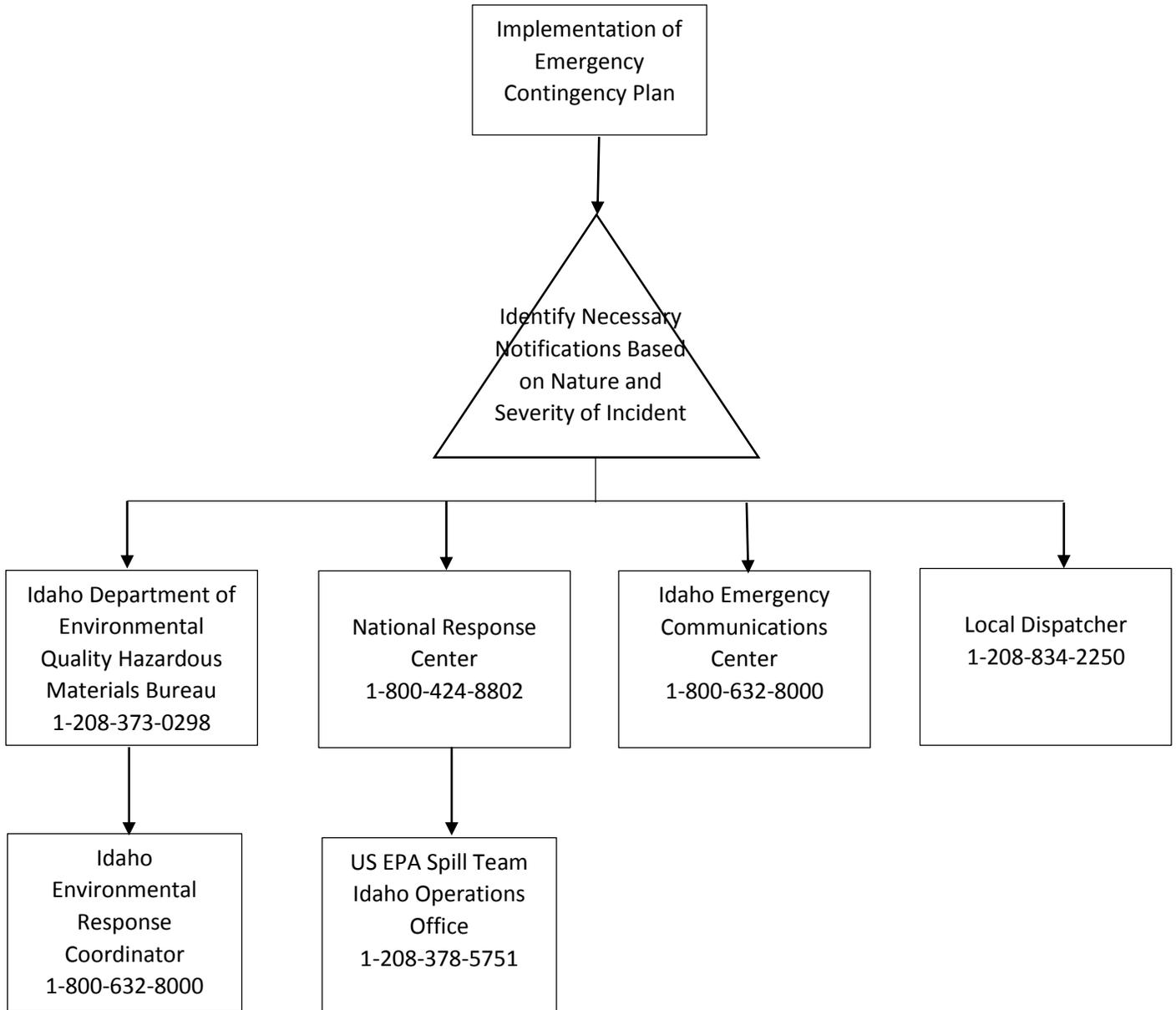


Figure G-4 – Injury Flow Chart

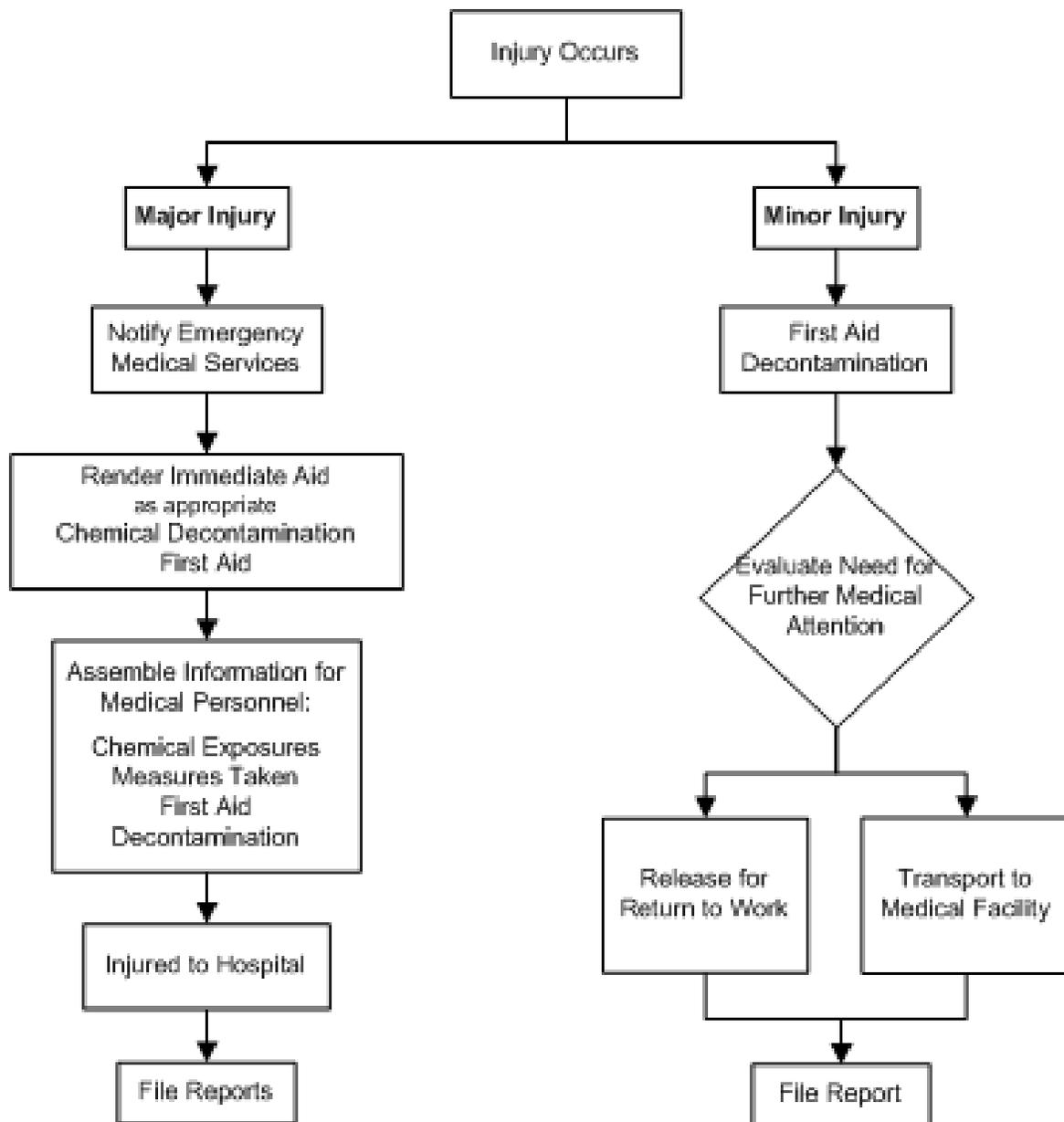


Figure G-5 – Fire Flow Chart

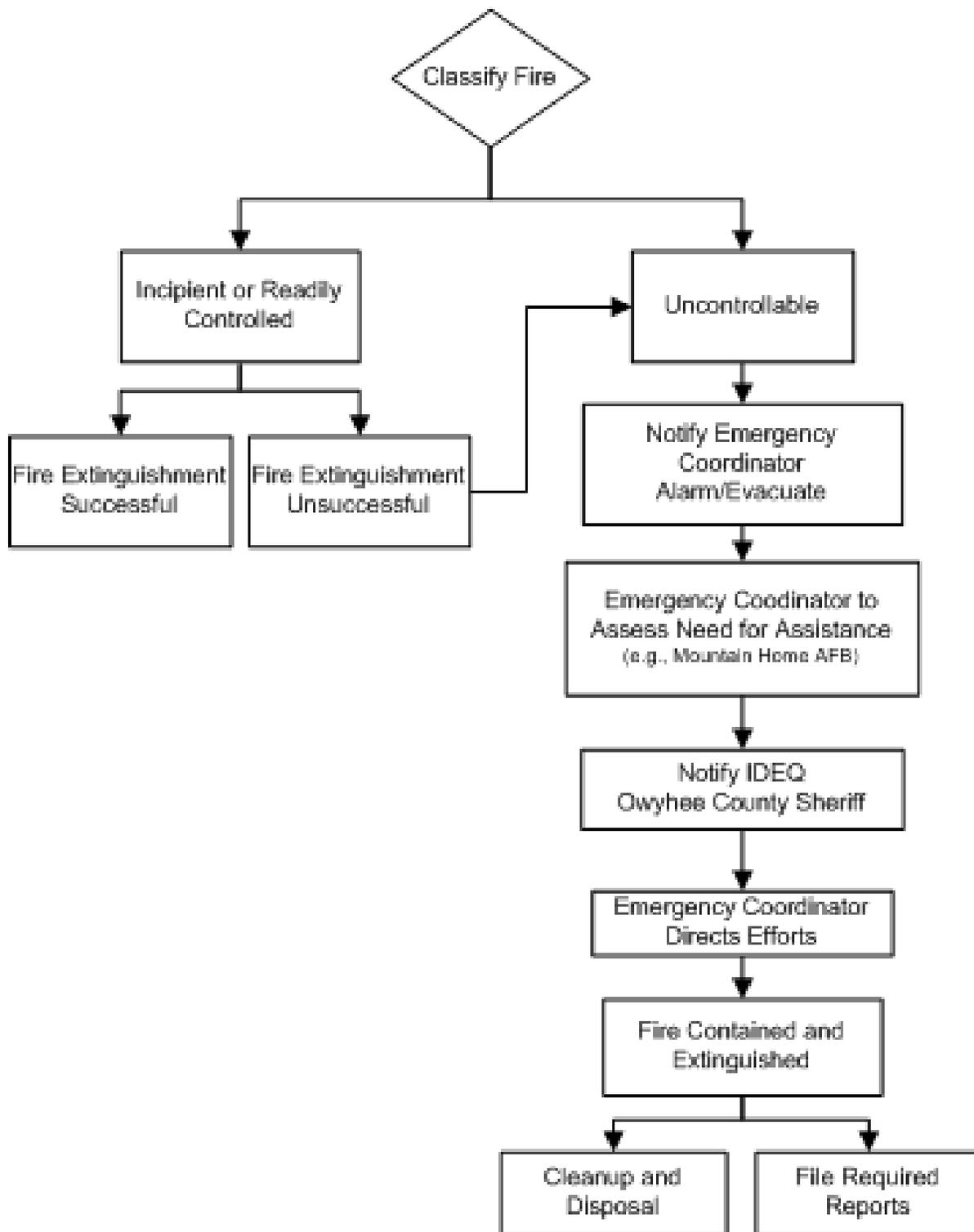
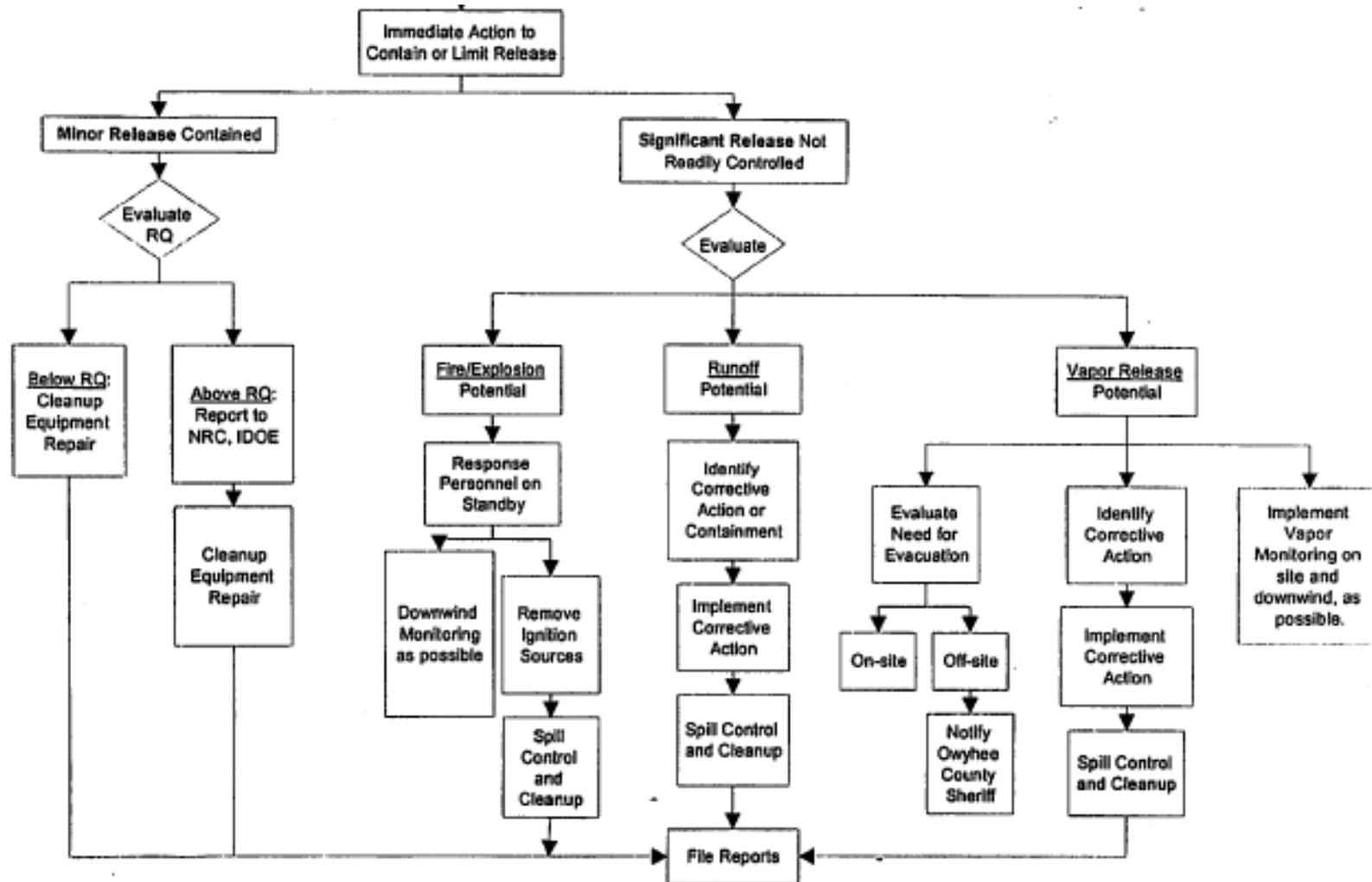
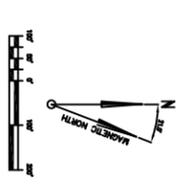
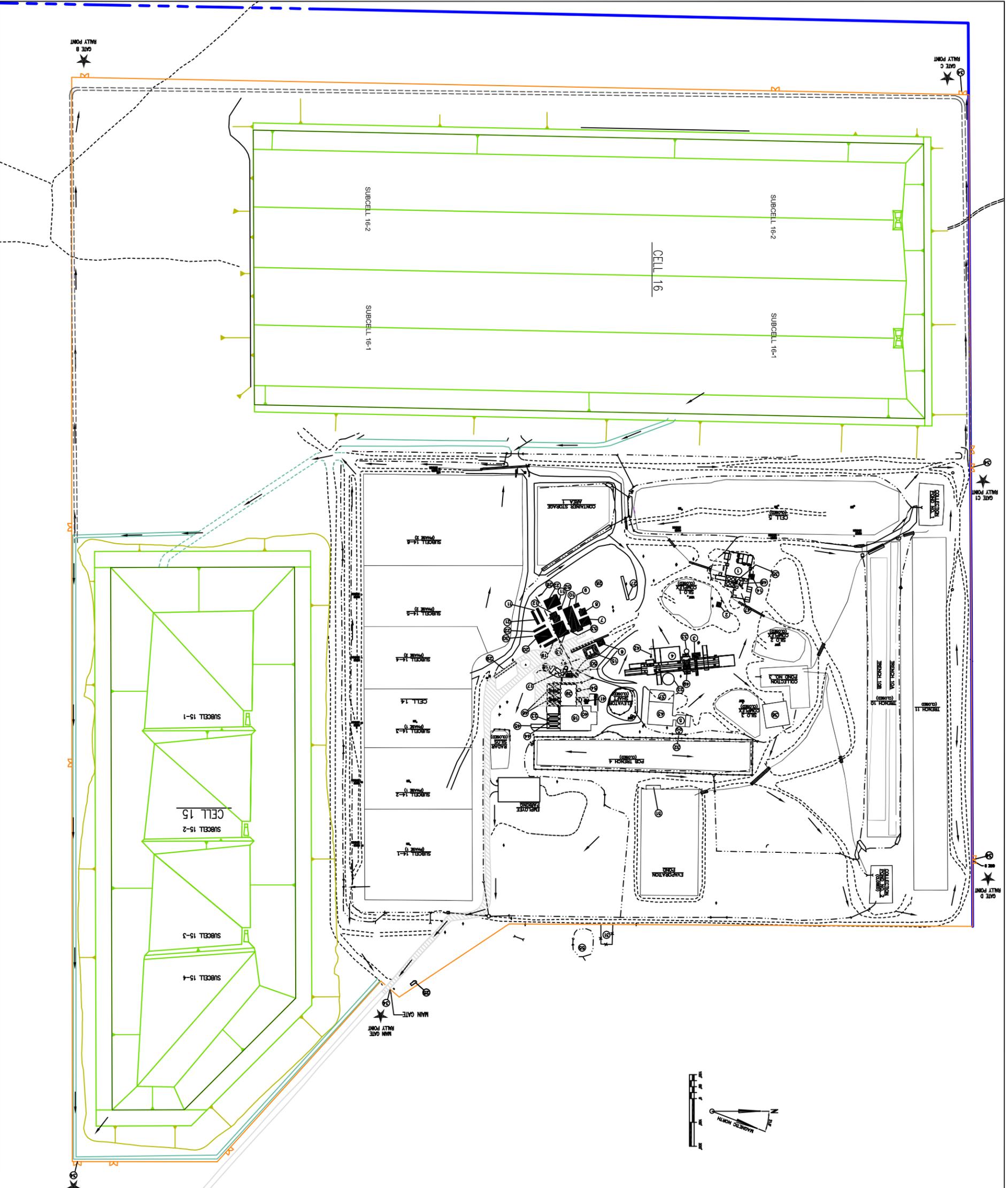


Figure G-6 – Spill Flow Chart





**LEGEND**

- X—X— EXISTING FENCE LINE
- — — — — PROPERTY BOUNDARY
- - - - - EXISTING UNIMPROVED ROAD
- ▬▬▬▬▬ EXISTING PAVED ROAD
- ▬▬▬▬▬ RCRA UNIT BOUNDARY
- ③④ FACILITY KEY NUMBER
- ★ RALLY POINTS

**FACILITY KEY**

- 1 CONTAINER STORAGE PAD 4
- 2 COMPRESSOR/AOC BUILDING
- 3 STABILIZATION FACILITY OFFICE
- 4 STABILIZATION FACILITY
- 5 PCB PROCESSING BUILDING
- 6 VEHICLE WASH FACILITY
- 7 PREHOUSE
- 8 FIELD TECH/PRE BUILDING
- 9 STORAGE BUILDING
- 10 MAINTENANCE SHOP
- 11 DECONTAMINATION BUILDING
- 12 LAB OFFICES
- 13 RECEIVING OFFICE/LAB
- 14 PAD 4 OFFICE
- 15 FUEL STORAGE TANKS/FUELING STATION
- 16 CONTAMINANT BUILDING
- 17 PUMP HOUSE/WATER STORAGE TANKS
- 18 COMPRESSED GAS STORAGE AREA
- 19 ADMINISTRATION BUILDING
- 20 ADMINISTRATION/LUNCH ROOM
- 21 ADMINISTRATION BUILDING
- 22 RECORDS STORAGE
- 23 REAGENT STORAGE
- 24 "UNASSIGNED"
- 25 SECURITY BUILDING
- 26 PROPANE TANK
- 27 SAWING PLATFORM
- 28 STAGING AREA
- 29 TRUCK SCALE
- 30 FLAG POLE
- 31 WEATHER STATION
- 32 DIESEL & PCB STORAGE TANK CONTAINMENT
- 33 UNDERGROUND CLEAN WATER TANK
- 34 EVACUATION GATES
- 35 RCRA STORAGE TANKS--4 UNITS
- 36 CONTAINER STORAGE PAD 5
- 37 PAD 6-RCRA/PCB STORAGE BUILDING APRON
- 38 "UNASSIGNED"
- 39 STABILIZATION BUILDING
- 40 BAG HOUSE
- 41 HEPA FILTER HOUSE AND FAN
- 42 YARD TRUCK SCALE
- 43 CONTAINER STORAGE PAD 7
- 44 CONTAMINANT BUILDING TRUCK UNLOADING APRONS 1,2 AND 3
- 45 CONTAMINANT BUILDING TRUCK UNLOADING APRON
- 46 STABILIZATION BUILDING TRUCK UNLOADING APRONS 1 AND 2
- 47 PROCESS PLANT PAD
- 48 LEACHATE TREATMENT SYSTEM
- 49 STABILIZATION FACILITY ADDITIVE SILOS
- 50 STABILIZATION BUILDING ADDITIVE SILOS
- 51 EVAPORATION POND LOADING/UNLOADING AREA
- 52 OFFICE TRAILER SANITARY TANK
- 53 LAB WASTE HOLDING TANK
- 54 CONTROL HOUSE
- 55 ET CAP TEST PAD

**FIGURE G-7**  
 Site Plan  
 Evacuation Routes & Rally Points

