

APPENDIX F

PROCEDURES TO PREVENT HAZARDS

1.0 FACILITY DESIGN AND OPERATION

The US Ecology Burlington, Inc. (USEB) facility is designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment.

2.0 SECURITY

All waste storage areas at the USEB facility are located within a secure building. The typical operating hours of the facility are between the hours of 5:30 a.m. and 9:00 p.m. Access to the building by the general public/visitors is limited to a single "main" door that leads to a staffed reception area. Visitors are required to sign-in upon entering the USEB facility and must be accompanied by authorized USEB personnel while on-site. All other points of access to the building are secured by either being kept locked or supervised by USEB personnel. Visitors are required to sign-out upon leaving the facility.

During hours of non-operation, all entrances and exits are locked, and the alarm systems are engaged.

The fire alarm system automatically notifies the Williston fire department upon activation. The security alarm is monitored by a private security company that notifies the primary emergency coordinator (or his/her alternate) in the event the system is activated. If an emergency contact cannot be reached, the security monitoring company will notify Williston Police Department that the system has been activated.

The USEB fire alarm system consists of:

- Four zone fire panel
- Pull stations (for fire alarm) located near exit doors
- Audible fire alarm horn
- Fixed temperature heat detectors
- Smoke detectors

The USEB security alarm system consists of:

- Eight zone security, keypad, siren driver, transformer, battery back-up
- Passive infrared motion sensors
- Intercom speakers
- Sensor door contacts

Each door leading to waste management areas of the USEB facility has a sign with the legend, "Danger Hazardous Waste Storage Area-Unauthorized Personnel Keep Out," which is legible from a distance of at least 25 feet. The legend is printed in English, which is the predominant language in the area surrounding the facility.

3.0 INSPECTION SCHEDULE

In order to prevent a release of hazardous waste constituents to the environment and a threat to human health, USEB personnel shall inspect the USEB facility and outdoor waste containment area according to the schedule included in **Table F-1** (Daily/Weekly Inspection Schedule), **Table F-2** (Monthly/Annual Inspection Schedule) included in **Attachment A**. In general, USEB’s inspection program covers:

Unit	Types of Problems	Frequency
Safety and emergency equipment (e.g., spill kits)	Inventory depletion	Daily
Operating and structural equipment	Deterioration, cracks, gaps, etc.	Daily
Aisle space	Inadequate aisle space, blocked rows	Daily
Containers and two 1,000-gallon poly tanks	Leaking/deterioration	Daily
Monitoring equipment	Malfunction, calibration drift	Monthly (Annual 3 rd Party Verification)
Containers and equipment used for hazardous waste containing volatile organic compounds	Emission leaks (per 40 CFR 264 Subpart BB and CC-See Section O)	Daily, annually

Any deterioration or malfunction of equipment or structures revealed during an inspection will be corrected so the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action will be taken immediately.

USEB will record inspections in a log (i.e., Tables F-1, F-2) that is maintained for at least three years as part of the facility operating record.

4.0 REQUIRED EQUIPMENT

All facility communications and alarm systems, fire protection equipment, spill control equipment, and decontamination equipment are tested and maintained as necessary to assure proper operation in time of emergency.

4.1 Communication Equipment

Internal communications and alarm systems used to provide immediate emergency instruction to the facility are described in the Evacuation Plan included in the Contingency Plan (**Appendix G**). An “all-building” page can be announced from any telephone at the USEB facility. Telephones capable of making external calls are located throughout the facility

Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all USEB personnel involved in the operation have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.

If there is ever just one employee on the premises while the facility is operating, he or she has immediate access to a telephone capable of summoning external emergency assistance.

4.2 Emergency Equipment

A list of emergency equipment (e.g., fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment) is included in **Attachment C** of the Contingency Plan (**Appendix G**).

4.3 Sprinkler Suppression System

The USEB facility is equipped with an automatic sprinkler system that has water supplied in adequate volume and pressure to meet local fire code requirements.

5.0 REQUIRED AISLE SPACE

USEB always maintains the required 24 inches of aisle space within all waste storage areas (i.e., storage cells) to provide for the unobstructed movement of personnel, fire protection equipment, spill control equipment, or decontamination equipment to any area of the facility.

6.0 ARRANGEMENTS WITH LOCAL AUTHORITIES

USEB will make arrangements to familiarize local police, fire departments, state emergency response teams, emergency response contractors, equipment suppliers and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to the facility, and possible evacuation routes. USEB will also make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

If state or local authorities decline to enter into such arrangements, USEB will document the refusal in the facility operating record.

7.0 PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT

7.1 Loading, Unloading and Container Handling Operations

Waste loading, unloading and handling procedures are described in the Process Information section (**Appendix D**). All containers of waste are moved using specialized equipment designed for that purpose.

7.2 Run-off, Run-on

The waste that is stored inside the USEB facility is located in containment cells, so run-on into and run-off from these inside waste storage areas does not occur. Refer to **Appendix D** for a description of how run-on that accumulates in the existing outdoor secondary containment structures used for transport vehicles and closed/tarped bulk containers (e.g. roll-off container) during bulking operations is managed.

7.3 Power Failures

In the case of a power failure, the facility may have to cease operations, but there would be no threat of a release or endangerment to human health or the environment. The various locations of emergency lighting units within the USEB facility are identified in the Contingency Plan (**Appendix G**).

7.4 Personnel Protective Equipment

USEB attempts to prevent employee exposure to hazardous waste constituents using engineering controls (e.g., ventilation), maintaining standard operating procedures for waste handling, and providing appropriate personal protective equipment. A list of emergency equipment is included in the Contingency Plan (**Appendix G**).

7.5 Minimize Release to the Atmosphere

Releases of hazardous constituents to the atmosphere are minimized by the fact that all wastes are stored in closed containers within the USEB facility. In addition, transport vehicles and bulk containers used for bulking operations (e.g. roll-off containers) are kept closed and are managed in accordance with DOT requirements.

8.0 IGNITABLE, REACTIVE AND INCOMPATIBLE WASTE

8.1 Prevention of Ignition or Reaction

Smoking is allowed in designated outdoor areas only. "NO SMOKING" signs are posted throughout the facility. Any work that involves open flames or other sources of heat (e.g., welding, cutting, etc.) must be accompanied by an USEB-issued hot work permit, pursuant to OSHA 29 CFR 1917.152 standards. Incompatible wastes are segregated, as described in the Process Information section (**Appendix D**).

8.2 General Handling Precautions

The procedures to be followed prior to mixing different waste streams together are specified in the Process Information section (**Appendix D**).

8.3 Management of Containers

Containers of ignitable or reactive waste are located at least 50 feet (15 meters) from the facility's property line (**Appendix D**). Incompatible wastes and materials are not placed in the same container or in unwashed containers that previously held incompatible wastes (**Appendix D**). Inspection and monitoring of containers in accordance with 40 CFR 264, Subpart CC is addressed in the Subpart CC Inspection and Monitoring Plan (**Appendix M**).

APPENDIX F: ATTACHMENT A

TABLE F-1

US ECOLOGY BURLINGTON DAILY / WEEKLY INSPECTION SCHEDULE FACILITY INDOORS		Insp Type <input type="checkbox"/> Daily <input type="checkbox"/> Weekly	Date:		Time:	
			Name of Inspector:			
			Signature of Inspector:			
Specific Item	Types of Problems	Inspection Frequency	Observations Comments	Action Req'd and Schedule	Date Action Completed	= Pass
Container storage areas	Evidence of spills; cracks; wear; corrosion; other deterioration	Daily				
Containers	Leaks; ruptures; corrosion; structural defects	Daily				
Container placement	Inadequate aisle space; No stacking higher than 2 drums	Daily				
Tanks	Evidence of spills; cracks; wear; corrosion; other	Daily				
Tanks Secondary Containment	Leaks; ruptures; corrosion; structural defects	Daily				
Sealing of containers	Open lids or bungs	Daily				
Spill Kits	Missing; not fully stocked	Daily / after each use				
Truck bays; load/unload containment area	Evidence of spills; cracks; wear; corrosion; other deterioration;	Daily				
Segregation of incompatible wastes	Storage of incompatible wastes in same area	Daily				
Telephone system	Power failure; malfunction	Daily use				
Public address	Power failure; malfunction	Daily use				
Unused Drums & Pails	Low inventory; wrong type	Weekly				
Emergency showers & eye wash stations	Low/no water pressure; clogged	Weekly				
Self-contained breathing apparatus	Low air pressure; deteriorated or missing parts; cylinder past date	Weekly / after each use				
Fire extinguishers	Needs recharging; missing; wrong type	Weekly / after each use				

APPENDIX F: ATTACHMENT A

TABLE F-2

<p align="center">US ECOLOGY BURLINGTON MONTHLY/ANNUAL INSPECTION SCHEDULE</p>		Insp Type <input type="checkbox"/> Monthly <input type="checkbox"/> Annual	Date:-	Time:		
			Name of Inspector:			Signature of Inspector:
Specific Item	Types of Problems	Inspection Frequency	Observations Comments	Action Req'd and Schedule	Date Action Completed	= Pass
Door locks	Malfunction	Monthly				
Heat sensors	Power failure; malfunction	Monthly				
Ventilation Hoods	Blockage; low flow; fan inoperable	Monthly				
Emergency Lighting	Battery low; malfunction	Monthly				
Spark Proof Flashlight	Missing; not charged; bad bulb	Monthly				
Warning Signs	Missing; obstructed	Monthly				
Neutralizing Agent	Missing; low inventory	Monthly				
Direct reading instruments, Oxygen meter, PID meter	Out of calibration, sensor depleted, low battery, missing, damaged	Monthly				
Medical & first aid supply	Low inventory, missing items	Monthly				
Booms and pads	Missing, low inventory	Monthly				
Clay Absorbents	Missing, low inventory	Monthly				
Spark proof shovels	Missing	Monthly				
Diesel compressor	Will not start, dead battery, spark plugs fouled, low fuel	Monthly				
Fire & Evacuation alarms	Power failure, malfunction	Annual				
Containers - If on-site > 1 year and contains > 500 ppm volatile organic compounds	Perform visual inspection of covers & closure devices. Check for visible cracks, holes, gaps, or other open spaces into interior of container when the cover and closure devices are secured in the closed position	Annual				