

**APPENDIX G**  
**CONTINGENCY PLAN**

## 1.0 INTRODUCTION

This contingency plan (“Plan”) is designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

The provisions of this plan are carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

## 2.0 EMERGENCY COORDINATORS

At all times, there is at least one employee either on the US Ecology Burlington, Inc. (USEB) facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. The emergency coordinator is thoroughly familiar with all aspects of this plan, all operations and activities at the facility, the location and characteristics of waste handled by USEB, the location of all records within the facility, and the facility layout. In addition, the emergency coordinator has the authority to commit the resources needed to carry out the contingency plan.

During an emergency, the emergency coordinator takes all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include stopping operations, collecting and containing release waste, and removing or isolating containers.

If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator monitors for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

The emergency coordinators are as follows:

### EMERGENCY COORDINATORS

#### Primary

Jeff Baker  
15 S Street Ln  
Essex Jct, VT 05452

### Telephone Numbers

Office (802) 860-1200  
Cell (802) 999-9438  
Home (802) 999-9438

#### Alternate

Jeff Frederick  
32 Audry Lane  
Westford, VT 05494

Office (802) 860-1200  
Cell (802) 923-6386

Andy Johnson  
497 VT Route 15  
Underhill, VT 05489

Office (802) 860-1200  
Cell (802) 735-7028

### 3.0 EMERGENCY PROCEDURES

#### 3.1 Emergency Response Procedures

In response to an imminent or actual emergency situation (i.e., in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility), the facility employee who first becomes aware of this type of situation, implements the emergency response procedures included in **Attachment A**. These procedures include:

- Notification of office personnel/emergency coordinator
- Assess if the material involved can be identified
- Assess if defensive actions can be taken safely to attenuate a release or extinguish a fire
- Take defensive actions if appropriate to do so
- Activation of facility wide evacuation alarm and/or fire alarm if defensive actions cannot be taken safely or are ineffective
- Notify emergency coordinator
- Assessment of the degree and extent of emergency
- Notification of proper authorities and spill response contractors
- Cleanup and reporting

Spill reporting shall be conducted in accordance with VHWMR Section 7-105.

#### 3.2 Evacuation Procedure

Whenever an imminent or actual emergency situation arises and a need to evacuate personnel from the facility is determined, the emergency coordinator initiates the following evacuation procedures by voice communication, PA system, and/or by the activation of the facility evacuation alarm. (Note: Facility personnel are trained in emergency evacuation action procedures, evacuation routes, and reassembly points). The Williston Fire Department is notified in the event that a facility evacuation occurs. The emergency coordinator will immediately notify the Williston Fire Department and the Vermont State Police if evacuation of local areas may be advisable.

In an emergency, all persons are to be evacuated from the facility and assembled on the lawn across Avenue D (next to the USPS mailbox). All employees leaving the building will assemble in this area. Employees should not leave the assembly area, nor should they leave the scene in their vehicles without the permission of the emergency coordinator. Supervisors must ensure all personnel are accounted for. The primary evacuation route is through the front of the building for office personnel and through the bay doors in the storage area (**Attachment B**). Secondary routes would be through the front office area entrance.

Exits and evacuation maps are clearly marked and posted throughout the facility.

USEB conducts evacuation drills once annually according to the Personnel Training Plan (**Appendix H**).

### 3.3 Reporting

If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility or the Contingency Plan is implemented, the emergency coordinator reports his/her findings as follows:

- Immediately notify the Williston Fire Department (802-878-5622), the Williston Police Department (802-878-6611) and US Ecology at (800) 899-4672. The emergency coordinator will be available on site to assist the appropriate officials in decisions pertaining to evacuation of local areas
- Immediately notify the Department of Public Safety (800) 641-5005 (24-HOURS)
- Immediately notify appropriate state or local agencies and contractors with specific response roles (see **Attachment C** for a list of emergency contacts)
- If the discharge or release occurred during transportation, the transporter shall, in addition to notifying the Secretary, notify the National Response Center, (800) 424-8802, with the following information:
  - (i) Caller's name and telephone number
  - (ii) Facility name, address and telephone number
  - (iii) Time and type of incident
  - (iv) Name (type) and quantity of material(s) involved, to the extent known
  - (v) Extent of any injuries, if any
  - (vi) Possible hazards to human health or the environment outside the facility
- Ensure that non-emergency personnel from the facility do not leave the designated assembly area or return to the scene of the emergency without obtaining permission from designated response personnel.

### 3.4 Emergency Equipment

A description of emergency equipment located at the USEB facility is provided in **Attachment D**. Any equipment used during the initial response to an emergency or other remediation efforts, is checked, cleaned, replaced and otherwise made fit for its intended use prior to the resumption of operations. The emergency coordinator is responsible for verifying emergency preparedness by arranging for the repair and/or replacement of equipment as deemed necessary after inspection.

### 3.5 Post-Emergency Procedures

Immediately after an emergency, the emergency coordinator provides for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

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

1. No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
2. All emergency equipment listed in **Attachment D** is cleaned and fit for its intended use before operations are resumed.
3. Note in the facility operating record the time, date, and details of any incident that requires implementing the contingency plan (the form included in **Attachment E** is used to document implementation of the contingency plan).
4. Within 10 days after the incident, a copy of the completed form is submitted to the Director of the Vermont Department of Environmental Conservation, Waste Management & Prevention Division, 1 National Life Drive-Davis 1, Montpelier, VT 05620-3704.
5. The person responsible for submitting the written report may request that it not be submitted for small discharges and/or releases that were reported as above and that have been entirely remediated within the ten (10) day period immediately following the discharge and/or release.

#### **4.0 ARRANGEMENTS**

The facility has made the following arrangements, as appropriate, for the types and quantities of wastes handled at the facility (**Attachment F**) and the potential need for the services of these organizations:

1. Arrangements to familiarize the Williston police and fire departments, and emergency response contractor (e.g., NRC East Environmental Services, Inc.) 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;
2. The Williston Police and Fire Departments are designated as the primary emergency authority; USEB has an agreement with NRC East Environmental Services, Inc. to provide emergency response services to support the primary emergency authorities;
3. Agreements with County and State of VT emergency response teams; VT Department of Environmental Conservation Emergency Management, VT Department of Public Safety and Chittenden Emergency Planning Committee; and
4. Arrangements to familiarize the University of Vermont Medical Center 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.

Where State, County or local authorities decline to enter into such arrangements, this refusal is documented in the facility operating record.

The contact information for the above local, county, state, federal and private emergency response officials/contractors is included in **Attachment G**.

## 5.0 PLAN DISTRIBUTION

A copy of the contingency plan and all revisions to the plan is:

- (a) Maintained at the facility; and
- (b) Submitted to the Williston police and fire departments, University of Vermont Medical Center, and State and local emergency response teams that may be called upon to provide emergency services (**Attachment G**).

## 6.0 PLAN AMENDMENTS

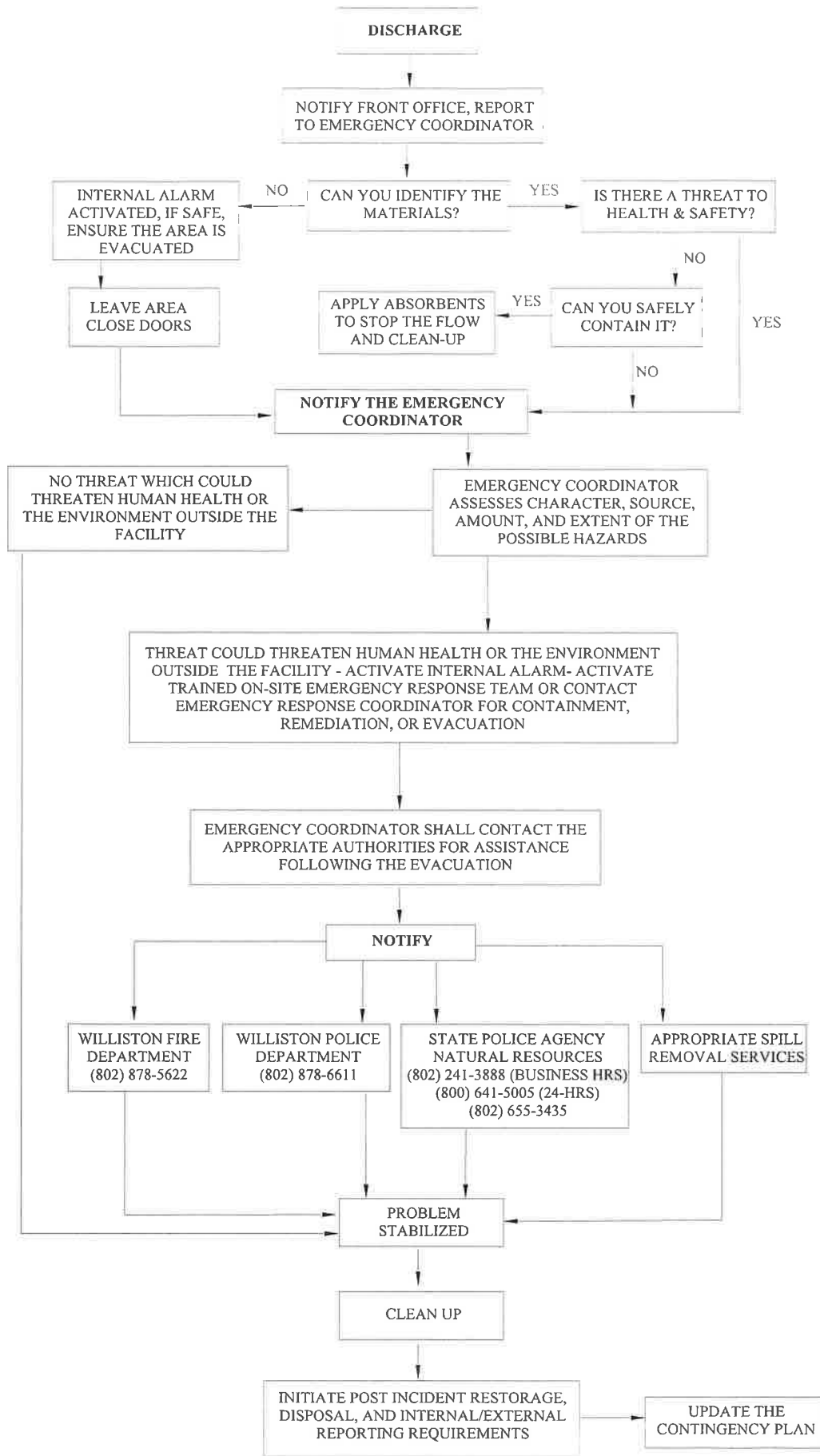
The contingency plan is reviewed, and immediately amended, if necessary, whenever:

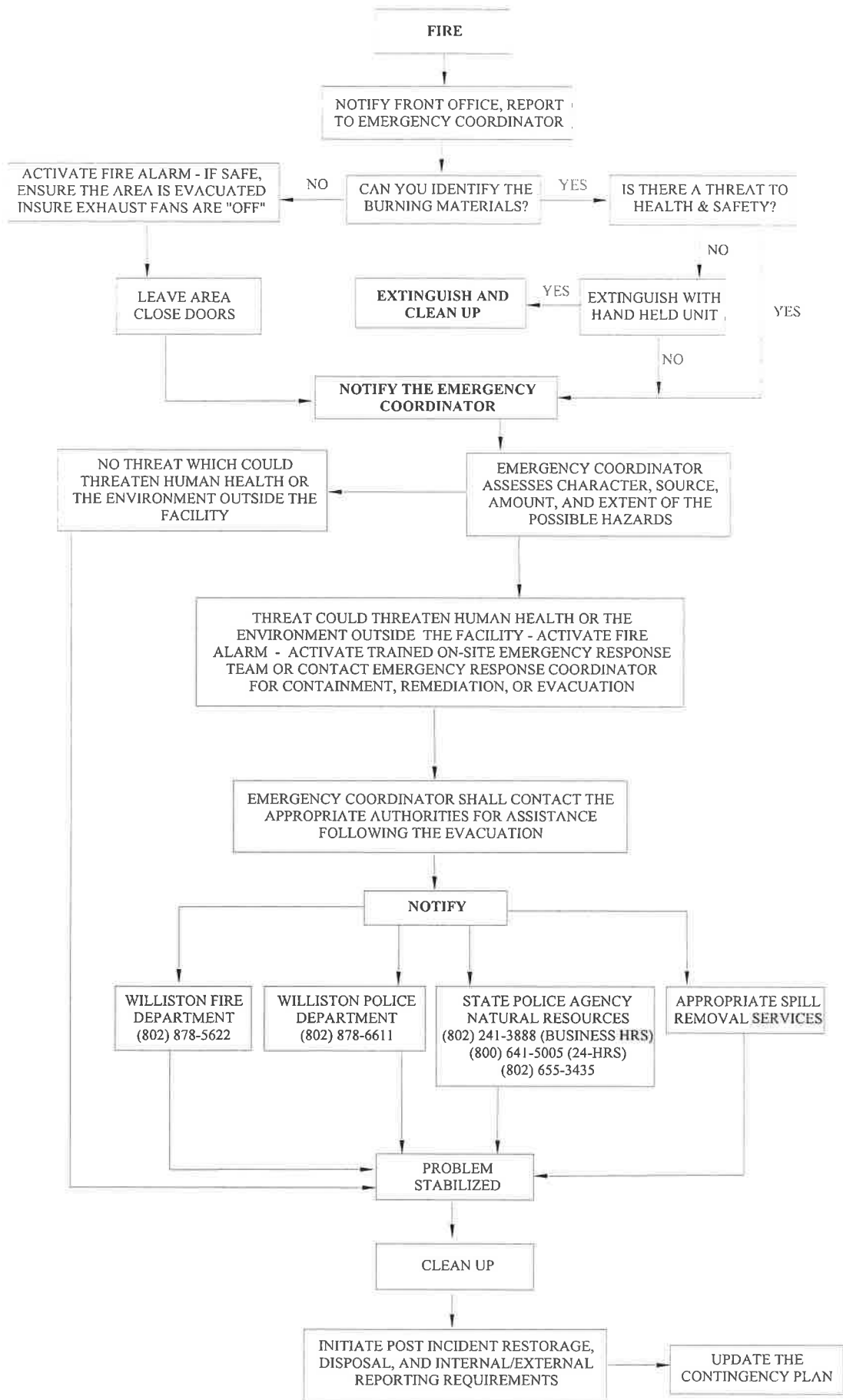
- (a) The facility permit is revised;
- (b) The plan is implemented;
- (c) The facility changes – in its design, construction, operation, maintenance, or other circumstances – in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- (d) The list of emergency coordinators changes; or
- (e) The list of emergency equipment changes.

## 7.0 QUICK REFERENCE GUIDE

A first responder quick reference guide is included as **Attachment H**.

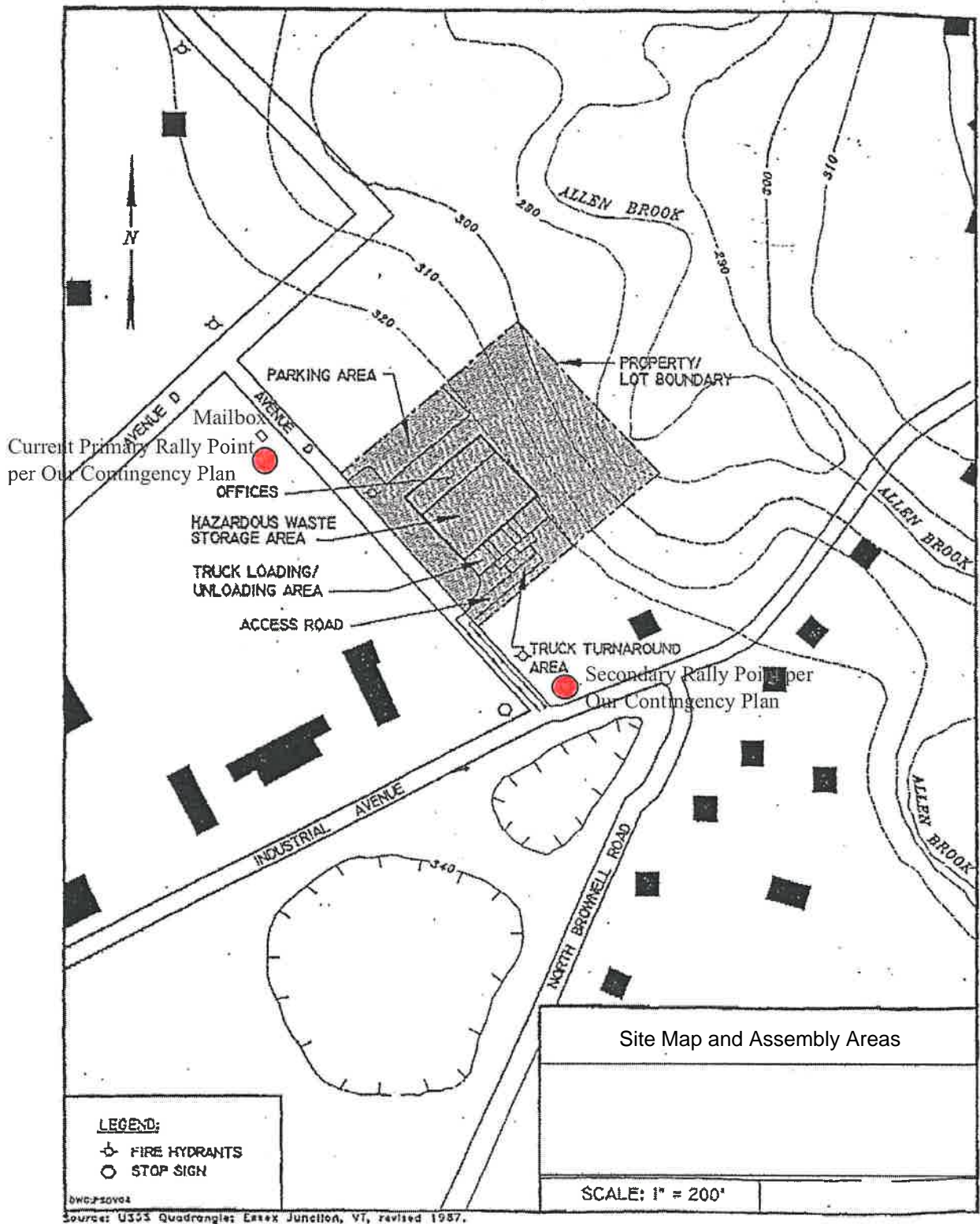
**APPENDIX G: ATTACHMENT A**  
**Discharge and Fire Procedure Flow Chart**







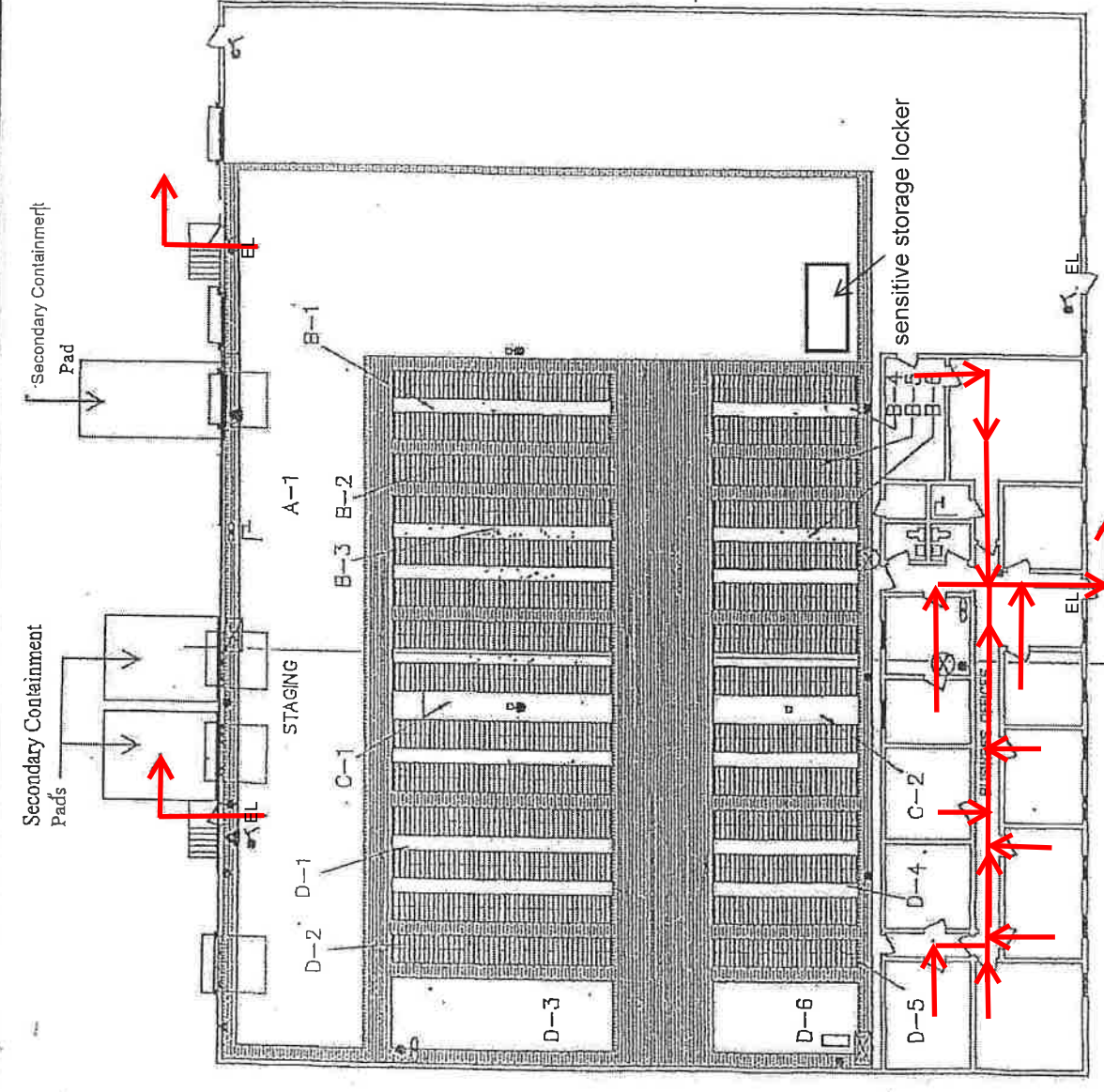
APPENDIX G: ATTACHMENT B SITE MAPS AND EVACUATION ROUTES



● Evacuation Assembly Location

**LEGEND**

- EVACUATION ALARM
- EYE WASH STATION
- FIRE ALARM
- FIRE EXTINGUISHER
- SHOWER
- SPILL KIT
- FIRST AID KIT
- SECURITY ALARM
- PHONE
- BEAK
- FIXED RAMP
- Evacuation Routes
- Overhead Door
- Emergency Light



Evacuation Route

Drawn by	Scale	Project No.	Sheet No.
Checked by	1:100	1000000000	00000000
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**APPENDIX G: ATTACHEMNT C**

**Emergency Contacts List**

<b>EMERGENCY COORDINATORS/CONTACTS</b>	<b>Telephone Numbers</b>
<b>Primary Emergency Coordinator</b>	
Jeff Baker 15 S. Street Ln. Essex Jct, VT 05452	Office (802) 923-1941 Cell (802) 999-9438-
<b>Alternate Emergency Coordinator</b>	
Jeff Frederick 32 Audry Lane Westford, VT 05495	Office (802) 923-1942 Cell (802) 923-6358
<b>Alternate Emergency Coordinator</b>	
Andy Johnson 497 VT Rte 15 Underhill, VT 05489	Office (802) 923-1970 Cell (802) 735-7028
<b>Emergency Response Contractor</b>	
NRC East Environmental Services, Inc. 280 Commerce St Williston, VT 05495	(800) 899-4672 (24-hours)
<b>Emergency – Fire, Police, Ambulance (911)</b>	
Chittenden Emergency Planning Committee	(802) 846-4490
Williston Fire Department	(802) 878-5622
Williston Police Department	(802) 878-6611
Department of Environmental Conservation; Waste Management Division	(802) 641-5005
Vermont Department of Public Safety (24-hours)	(800) 641-5005
State Police	(802) 655-3435 or (802) 878-7111
National Response Center	(800) 424-8802
Chemtrec	(800) 424-9300
University of Vermont Medical Center	(802) 847-2434

## APPENDIX G: ATTACHMENT D

### Emergency Equipment

The equipment described below is available for emergency response use by employees who have taken a 40-hour OSHA training course in Hazardous Waste Operations and Emergency Response.

Pads, Booms, and Speedi-Dry. Pads, booms, and Speedi-Dri will be used to limit the flow of spilled material and localize the response effort. They will be deployed in front of the spill. These materials may also be used to absorb spilled liquids. If contaminated, the material will be disposed of as hazardous waste. These materials are available in the spill kits and in the equipment supply area.

Tyveks, Yellow and White. White Tyveks are available for use in response situations where minimal protection to the individual and his clothing is required. These items are stored in the equipment supply area. Yellow chemically resistant Tyveks are available for use in response to emergencies when more protection is required. These garments offer protection to the individual and his clothing. Yellow Tyveks are part of the proper attire where Level B protection is required. Tyveks are available in the spill kits and the equipment supply area.

Gloves. Gloves are available for emergency response procedures. This form of protection must be used whenever the potential for direct skin contact exists when handling hazardous waste or hazardous materials. Gloves are to be selected according to the chemicals spilled. It is recommended that surgical gloves be worn under outer gloves to provide additional protection. A glove selection chart is posted in the facility. Gloves are available in the spill kits and in the equipment supply area.

Boots. Disposable boots are to be used when protective footwear is required beyond that which the employee is already wearing. Disposable boots are available in the spill kits and in the equipment supply area. If additional protection is required heavy duty chemical resistant boots are available in the equipment storage area.

Goggles & Safety Glasses. Goggles or safety glasses are to be worn at all times in the facility. Goggles are to be used when the potential for dust, debris, and splashes warrants more protection than is afforded by safety glasses. Use of full-face respirators and SCBA equipment may supplant the requirements for the use of goggles. Additional goggles and safety glasses are available in the spill kits, and in the equipment supply area.

Spark-Proof Shovels. Spark-proof shovels are available for use in cleaning up contaminated absorbent materials and hazardous waste. In addition to the shovels in use throughout the facility, spark proof shovels are available in the equipment storage area.

Containers & Liners. Pails, drums, boxes and specialty containers are available for storage of contaminated debris and hazardous waste resulting from emergency response activities. Overpack drums are available to provide secondary containment for leaking drums and are located in the drum storage area and at the spill kit locations. 6 mm drum liners are available in the spill kits and in the equipment storage area to prevent materials from reacting with their containers.

Sample Vials. Sample vials and jars are available in the equipment storage area and will be used when the precise chemical nature of the spill debris is unknown.

pH Paper. pH paper is available for use when the corrosivity of spill debris is in question. The pH paper is available in the equipment supply area and the QC area.

Labels. Labels are to be used to identify any containers used to store hazardous waste, including contaminated debris following an emergency. Labels are available in the QC area and in the equipment supply area.

Face Shields. Face shields may be used in place of safety goggles. Face shields are stored in the equipment storage area.

Hard Hats. Hard hats are available for use when the potential for an overhead hazard exists. Hard hats are stored in the equipment storage area.

Acid Suits. Acid suits are available for use in response to acid spills. The suits are stored in the equipment supply area.

SCBA. SCBA are available for use in any situation that is potentially immediately dangerous to life and health, including situations where the chemical hazard is unknown, or where confined space entry may be required. Both SCBA's are available in the changing room. Use of the "buddy system" is mandatory.

Flashlight. A spark-proof flashlight is available for use when portable illumination is required. This light is stored in the operations manager's office (center office - facility side).

Explosion-Proof Vacuum, Drum Head Vacuum, Broom, and Dust Pans. These items may be used to clean up hazardous debris resulting from a spill. They are stored in the equipment storage area.

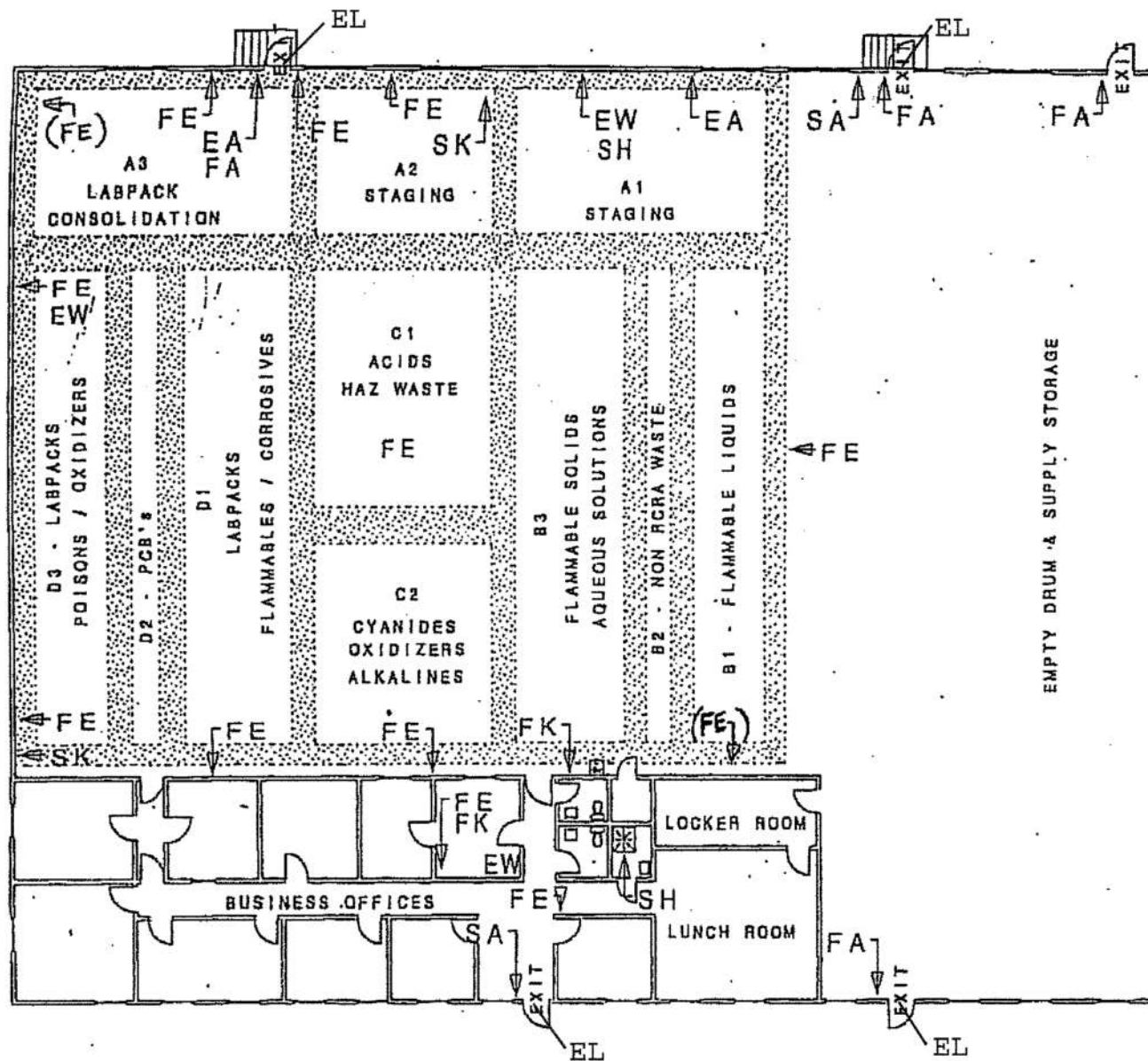
Hazard Identification Tape. This tape is available for marking an area where emergency

response operations are ongoing. The tape may be used to limit access to such an area. Hazard Identification Tape is located in the equipment storage area.

Direct Reading Instruments. Direct reading instruments are available for analyzing an environment where a spill has occurred. These devices include a combustible gas meter to detect the presence and level of explosive gases in the environment and a photoionization detector for measuring ionization potential.

### List of Emergency Equipment

Unit	Location
Fire extinguisher, ABC, 20 lbs.	Left of truck bay door 6
Fire extinguisher, ABC, 20 lbs.	Wall between D-3 and A
Fire extinguisher, ABC, 20 lbs.	Wall by D-6
Fire extinguisher, ABC, 20 lbs.	Office wall next to management access
Fire extinguisher, ABC, 20 lbs.	C-1 middle
Fire extinguisher, ABC, 20 lbs.	Truck bay wall opposite D-1
Fire extinguisher, ABC, 20 lbs.	Left of truck bay door 5
Fire extinguisher, ABC, 20 lbs.	Between truck bay door 4 and 5
Fire extinguisher, ABC, 20 lbs.	Beam B-1
Fire extinguisher, ABC, 5 lbs.	Reception area
Fire extinguisher, ABC, 20 lbs.	Office wall near C-2
Fire extinguisher, ABC, 20 lbs.	Office wall near B-4
Fire extinguisher, ABC, 10 lbs.	Lab near sink
Pads, booms, and speedi-dry	Supply racks
Tyveks	PPE supply shelf
Gloves	PPE supply shelf
Disposable boots	PPE supply shelf
Goggles and safety glasses	PPE supply shelf
Spark-proof shovels	Supply storage area
Containers & liners	Supply storage area/supply trailer
Face shields	PPE supply shelf
Hard hats	Supply storage area/conference room
Drum vacuum, broom & dust pans	Supply storage area
Hazard identification tape	Supply storage area
SCBA	Changing room
Flashlight	Operation manager's office
Direct reading instruments	Lab/Supply storage area



**LEGEND**

- EA - EVACUATION ALARM
- EW - EYE WASH STATION
- FA - FIRE ALARM
- FE - FIRE EXTINGUISHER
- FK - FIRST AID KIT
- PH - TELEPHONE
- SA - SECURITY ALARM
- SH - SHOWER
- SK - SPILL KIT
- EL - EMERGENCY LIGHTING

## APPENDIX G: ATTACHMENT E

### Implementation of the Contingency Plan Form

(1) Name, address, and telephone number of operator and facility:

Operator and Facility Name	Operator's and Facility's Address	Operator's and Facility's Telephone number
US Ecology Burlington	54 Avenue D Williston, VT 05495	802-860-1200

(2) Name, address, and telephone number of facility contact person familiar with incident:

Name of Contact	Contact's Address	Contact's Telephone number

(3) Date, time, and type of incident:

Date and Time of Incident	Type of Incident

(4) Name and quantity of material(s) involved:

Name of Material Involved in the Incident	Quantity of Material

(5) The extent of injuries, if any;

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- (6) An assessment of actual or potential hazards to human health or the environment, where this is applicable:

- (7) Estimated quantity and disposition of recovered material that resulted from the incident.

## APPENDIX G: ATTACHMENT F

### TYPICAL WASTE INVENTORY

DESCRIPTION	LOCATION/ BAY NOS.	NO. OF UNITS	TYPICAL UNIT DESCRIPTION
FLAMMABLE LIQUIDS/SOLVENTS	B1, B2, B3, B4	647	55 GALLON
FLAMMABLE SOLIDS	B5, B6	235	55 GALLON
ALKALINES	C1, OSC	353 DM 2 Tanker	55 GALLON/TANKER
ACIDS	C2	235	55 GALLON
CLASS 9	D1, OSC	265 DM 2 Roll off	55 GALLON/ROLL OFF BOX
LABPACKS- ALL TYPES OF WASTES "REACTIVES" CABINET	D3, D6	518	55 GALLON
PCB'S	D5	100	55 GALLON
OILY WASTE WATERS	A1	2 x 1,000	STORAGE TANKS
MIXTURE OF ALL ITEMS DESCRIBED ABOVE AND DEA WASTES (CONTROLLED SUBSTANCES)	A1	716	55 GALLON

OSC = Outdoor Storage in Containment

**APPENDIX G: ATTACHMENT G**  
**CONTINGENCY PLAN DISTRIBUTION LIST**

<p>Jeff Baker  US Ecology Burlington  54 Avenue D  Williston, VT 05495</p>	<p>State of Vermont  Department of Public Safety  Division of Emergency Management &amp; Homeland Security  Attn: Director of Emergency Management  45 State Drive  Waterbury, VT 05671-1300</p>
<p>Jeff Frederick  US Ecology Burlington  54 Avenue D  Williston, VT 05495</p>	<p>Ms. Anna Bourakovsky  Department of Environmental Conservation  Vermont Agency of Natural Resources  1 National Life Drive, Davis 1  Montpelier, VT 05620-3704</p>
<p>Andy Johnson  US Ecology Burlington  54 Avenue D  Williston, VT 05495</p>	<p>Local Emergency Planning Committee (LEPC #1)  c/o Chittenden County Regional Planning Commission (CCRPC)  110 West Canal Street, Suite 202  Winooski, VT 05404-2109</p>
<p>Williston Fire Department  Fire Chief  645 Talcott Road  Williston, VT 05495</p>	<p>University of Vermont Medical Center  Attn: Risk Management  111 Colchester Avenue  Burlington, VT 05401</p>
<p>Williston Police Department  Chief of Police  7928 Williston Road  Williston, VT 05495</p>	<p>Mr. David Cowie  DAC III, LLC  79 Parker Street  Newburyport, MA 01950</p>
<p>Vermont State Police  2777 St. George Road  Williston, VT 05495</p>	<p>NRC East Environmental Services, Inc.  280 Commerce Street  Williston, VT 05495</p>
<p>Director  Department of Environmental Conservation  Vermont Agency of Natural Resources  1 National Life Drive, Davis 1  Montpelier, VT 05620-3704</p>	

## APPENDIX G: ATTACHMENT H

### Quick Reference Guide

#### Typical Inventory:

Type/Names of Hazardous Waste	Hazard	Estimated Maximum Amount
Flammable solvents/paints/fuels	Ignitable/Toxic	20,000 Gallons
Spent Acids*	Corrosive/Toxic	8,000 Gallons
Spent Alkalines/Bases	Corrosive/Toxic	12,000 Gallons
Cyanides**	Corrosive/Toxic/Potential Inhalation Hazard on contact with Acids	2,750 Gallons
Oxidizers	Reactive/Intensify Fire	3,000 Gallons
PCBs	Toxic	3,000 Gallons
Heavy Metals Containing Solids/Liquids***	Toxic	20,000 Gallons
Water Reactive Material	Reactive/Toxic	2,000 Gallons
Solvent/Fuel Contaminated Solids/Debris	Ignitable/Toxic	30,000 lbs

\*Exposure to acids could include Hydrofluoric acids/vapors which will require specialized medical treatment.

\*\*Exposure to cyanide containing materials/vapors will require specialized medical treatment.

\*\*\*Exposure to heavy metals bearing wastes may require specialized medical treatment.

#### Emergency Coordinators

Primary: Jeff Baker – 802-999-9438

Secondary: Jeff Frederick – 802-923-6386

Alternate: Andy Johnson – 802-735-7028

#### Evacuation Procedure and Routes:

Evacuation will be signaled by voice over public address and/or activation of the designated evacuation alarm signal. Office personnel will evacuate through the front main office door on the north side of the building adjacent to the parking lot. Personnel will continue north on Avenue D to the corner and assemble near the USPS mailboxes. Personnel will remain in this area until released by the Emergency Coordinator. Warehouse personnel will also evacuate to the north side of the building if possible and proceed to the same rally point. If unable to evacuate to the north, doors on the south side of the building, to the loading dock area, will be used for evacuation. If blocked from the primary rally point, personnel will assemble at the secondary rally point at the corner of Avenue D and Industrial Avenue and await instructions from the Emergency Coordinator.

Exits and evacuation maps are clearly marked and posted throughout the facility.

USEW conducts evacuation drills once annually according to the Personnel Training Plan

### **Waste Storage/processing areas and Fire Hydrant Map**

The following maps and diagrams show access points and locations of waste storage and processing areas and a map of nearest fire hydrants. Complete flow rate data is not available from the Williston Water Department. The lowest flow rate in surrounding hydrants is 820 GPM in the first hydrant on Avenue D from Industrial Avenue.

### **Surrounding Properties**

East and South of the facility are primarily residential single/multi family properties. The west and north of the facility are comprised of industrial and commercial properties.