

APPENDIX H
CONTINGENCY PLAN

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CONTINGENCY PLAN

This plan meets the emergency response and contingency planning requirements of the Vermont Hazardous Waste Management Regulations (VHWMR) and 40 CFR §§ 270.14(b)(7) and 264 Subpart D. Since the Barre Service Center (BSC) is located within a 100-year floodplain, this plan also meets the requirement of 40 CFR § 270.14(b)(11)(iv)(C).

This plan describes actions to be taken to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, ground water, or surface water. The plan also includes procedures to be followed to remove hazardous waste to safety, should the National Weather Service issue a 100-year Flood Warning for the BSC area.

This plan shall be implemented immediately when a fire, explosion, or discharge of hazardous waste or hazardous waste constituents occurs, which could threaten human health or the environment, or when a 100-year flood is predicted.

The plan shall be amended when information included in this Plan changes. Copies of the plan in effect at any given time shall be maintained at the BSC and provided to the local police department, fire department, and hospital for use during an emergency.

H - 1.0 GENERAL INFORMATION

The address of the BSC is:

Safety-Kleen Systems, Inc.
23 West Second Street
Barre, Vermont 05641

The operator of the Service Center is:

Safety-Kleen Systems, Inc.
42 Longwater Drive
Norwell, MA 02061-9149

H – 1.1 General Description of Business Activity

See **Appendix B** (Facility Description) for a detailed description of BSC business activities.

Containerized Waste

The BSC is permitted to store containerized hazardous waste in three designated Hazardous Waste Management Units (HWMUs), each with specific waste type and capacity limits. The facility may also manage containerized hazardous and non-hazardous wastes on a 10-day transfer basis within these three units, provided the waste type and capacity requirements are met. The three HWMUs used for storing containerized wastes include two units located in the warehouse (HWMUs #3 and #4) and the metal storage shelter (HWMU #5). The locations of these secondarily contained units are shown on **Figure B-1** (Site Plan).

All ignitable containerized wastes (i.e., in storage and 10-day transfer waste) are stored/held only in HWMUs #4 and HWMU #5 (both units are equipped with a dry chemical fire suppression system). Non-ignitable waste may be stored in any of the permitted container storage units. Incompatible wastes are segregated in accordance with 49 CFR § 177.848.

Bulk Waste Storage in Tanks

The BSC is permitted to store spent hydrocarbon-based parts washing solvent in a designated 15,000-gallon aboveground storage tank (HWMU #1, Tank #3). Two additional 15,000-gallon aboveground storage tanks (Tanks #1 and #2) are designated for used oil storage. All three tanks are located within the same epoxy-coated concrete secondary containment system and covered by an aluminum-framed weather-proof fabric structure. The configuration of the three tanks and secondary containment system is detailed on **Figure L-1** (Tanks).

Spent hydrocarbon-based parts washer solvent is transferred to Tank #3 using a “wet dumpster” located within the warehouse atop a secondarily contained dock referred to as the return and fill station (**Figure B-1**). Used oil is transferred directly to Tanks #1 and #2 from tankers (parked on the transfer pad) via reinforced flexible hose with secure coupling connectors (**Figure B -1**).

H - 2.0 COORDINATION AGREEMENTS

Arrangements are made with the police department, fire department and local emergency response teams to familiarize them with the Contingency Plan (including the Flood Contingency Plan), the layout of the BSC, the properties of hazardous materials handled and their associated hazards, locations where Service Center personnel normally work, entrances to and layout of the BSC, and evacuation routes. A copy of the Contingency Plan (as modified) is sent to the following agencies:

- Barre City Police Department
- Barre City Fire Department
- Central Vermont Hospital
- Clean Harbors Environmental Services, Inc.

Copies of the transmittal letters will be maintained as part of the facility record, and documentation of any refusal by authorities to enter into agreements will also be documented in that record.

H - 3.0 IMPLEMENTATION

The primary emergency coordinator or alternate emergency coordinator for the BSC (Emergency Coordinator) is responsible for determining if the Contingency Plan should be implemented. The decision to implement the Contingency Plan shall be made if an imminent or actual incident such as a fire, explosion or release of hazardous waste or hazardous waste constituents could

threaten human health or the environment, or if a potential 100-year flood is predicted.

H - 4.0 EMERGENCY COORDINATORS

The Emergency Coordinators are trained, as specified in **Appendix F**, to respond in the event of an emergency, and shall be familiar with all aspects of this contingency plan, the operations and activities at the facility, the location and characteristics of materials handled, the location of records within the facility, the facility layout, and the location and use of emergency response and spill control equipment.

The names of, and home addresses, cell phone numbers, and office phone numbers for, the Emergency Coordinators are listed in **Table H – 1**.

The Emergency Coordinators are authorized to commit BSC resources, equipment, and personnel, as necessary, to implement this Contingency Plan. At all times, at least one Emergency Coordinator is either at the BSC, or on call and capable of reaching the BSC to effectively respond to emergencies, including predicted 100-year flood conditions.

TABLE H - 1

List of Emergency Coordinators

<u>Emergency Coordinators</u>	<u>Office Phone #</u>	<u>Home/Cell Phone #</u>	<u>Home Address</u>
Primary Robert Millett	(802) 479-1200	(802) 505-1031 (C)	15 Buena Vista Circle Barre, VT 05641
Alternate Chad Mcgowen	(802) 479-1200	802-522-4921 (C)	177 Cassie St. Barre, VT 05641
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When the Emergency Coordinator is notified of an imminent or actual emergency, it is his or her responsibility to:

- Evaluate the situation and determine if the Contingency Plan should be implemented.
- If the Contingency Plan is implemented, ensure that all response activities are conducted in accordance with the Contingency Plan.
- Activate BSC alarm systems, as appropriate.
- Identify the character, source, amount, and extent of any released materials.
- Assess potential hazards to human health and the environment.
- Immediately notify local emergency response officials, state and municipal agencies, and Safety-Kleen's 24-hour emergency hotline (see **Table H-2**).
- Supervise implementation of the evacuation plan if the decision to evacuate is made.
- Act as liaison between emergency response personnel, state officials, and BSC personnel.
- Ensure that the reporting requirements of **Section H - 10.0** are met.

H - 5.0 EMERGENCY PROCEDURES

- 1) Whenever there is an imminent or actual emergency situation, the Emergency Coordinator must do the following immediately:
 - Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and
 - Notify appropriate state or local agencies with designated response roles if their help is needed (See **Table H-2**).

- 2) Whenever there is a release, fire, or explosion, the Emergency Coordinator shall perform the following concurrently:
 - Immediately identify the character, exact source, amount, and areal extent of any released materials. The emergency coordinator may do this by observation or review of the facility records or manifests and, if necessary, by chemical analysis.
 - Assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).

- 3) 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, the emergency coordinator must report the findings as follows:
 - If the assessment indicates that evacuation of local areas may be advisable, the

emergency coordinator must immediately notify appropriate local authorities. The emergency coordinator must be available to help appropriate officials decide whether local areas should be evacuated; and

- The Emergency Coordinator must immediately notify either the government official designated as the on-scene coordinator for that geographical area, or the National Response Center (using their 24-hour toll free number 800/424-8802). The report must include:
 - Name and telephone number of reporter;
 - Name, address and telephone number of the BSC;
 - Time and type of incident (e.g., release, fire);
 - Name and quantity of material(s) involved, to the extent known;
 - The extent of injuries, if any; and
 - The possible hazards to human health or the environment outside the facility.
- 4) During an emergency, the Emergency Coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the generator's facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released hazardous waste, and removing or isolating containers.
- 5) If the facility stops operations in response to a fire, explosion or release, the Emergency Coordinator must monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment, wherever this is appropriate.
- 6) Immediately after an emergency, the Emergency Coordinator must provide 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. Unless the facility can demonstrate that the recovered material is not a hazardous waste, then it is a newly-

generated hazardous waste that must be managed in accordance with all the applicable requirements of this permit and the VHWMR.

- 7) Ensure that in the affected area(s) of the facility, no hazardous waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed, and all emergency equipment listed in this plan is cleaned and fit for its intended use before operations are resumed.

- 8) The time, date, and details of any incident that requires implementing the contingency plan shall be noted in the facility operating record, and within 10 days after the incident, a written report on the incident shall be submitted to the Agency pursuant to the requirements of **Section 10.0**.

TABLE H - 2
Emergency Notifications

Department or Agency	Phone Number	Initial Criteria for Contact
Emergency Notification Phone Numbers		
Internal: Safety-Kleen 24hour Emergency Number	(800) 468-1760	Implementation of the contingency plan
External: National Response Center 24-hour Emergency Number	(800) 424-8802	Release of a reportable quantity of hazardous waste to the Environment.
During normal business hours: Vermont DEC	(802) 828-1138	Implementation of the contingency plan, Notification of releases in accordance with VHWMR § 7-105(a)(2)(a)
Outside normal business hours: Vermont Department of Public Safety – Emergency Management Division	(800) 641-5005	
Barre Police Department	911 or (802) 476-6613	Imminent danger to human health.
Barre Fire Department	911 or (802) 476-0254	Fire or other emergency that poses imminence to human health or the environment.
Central Vermont Hospital	(802) 371-4100	Injuries sustained.
Barre Ambulance	911 or (802) 476-0254	Injuries that require patient transport.
Clean Harbors Env. Serv, Inc.	(800) 645-8265	For assistance with or remedial action.

H - 6.0 100-YEAR FLOOD EMERGENCY PROCEDURES

In the event of a predicted 100-year flood, the Emergency Coordinator shall measure the volume of spent solvent in Tank #3 (HWMU #1) and used oil in Tanks #1 and #2 and determine the total volume of containerized waste on site. Based on these volumes, the requisite number of container and bulk liquid transport vehicles shall be summoned if a 100-year Flood Warning is issued by the National Weather Service. Generally, the National Weather Service can predict and issue flood warnings 24 hours in advance.

The Barre Emergency Management Director monitors water levels for the Barre area. In the event of threatening flood conditions, the Emergency Management Director notifies the BSC Emergency Coordinator.

H-6.1 100-Year Flood Emergency Response Procedures

Following notification of impending flood conditions, the emergency coordinator, or designee, immediately:

- a. activates the internal facility communication system to notify facility personnel;
- b. contacts the organizations listed on Table Flood-1 for assistance, and
- c. cooperates with the Barre Emergency Management Director.

TABLE FLOOD - 1

Emergency Contacts for 100-Year Flood Response

Department or Agency	Phone Number
Safety-Kleen 24-hour Emergency Number	(800) 468-1760
Safety-Kleen Linden, NJ Recycle Center	(908) 862-2000
Emergency Management Director	(802) 476-0255
Vermont DEC	(802) 828-1138

In the event of a predicted 100-year flood, incoming shipments of containerized and bulk wastes scheduled for the BSC will be diverted to other permitted facilities. In addition, wastes stored on site will be shipped off site either to facilities permitted to accept the waste or to a 10-day transfer facility prior to a flood event.

Based on a maximum inventory of two hundred and seventy-three 55-gallon drum equivalents, two 50-container loads and seven 25-container loads would be required to remove the complete container inventory if the BSC is at capacity. Eight tank trucks, each with a capacity of at least 6,000 gallons, would be required to remove the bulk storage inventory if the BSC is at capacity.

The Safety-Kleen corporate fleet is available to the BSC on an as needed or emergency basis.

H - 7.0 EVACUATION PLAN

If the Emergency Coordinator determines that evacuation of the BSC is prudent, the Emergency Coordinator, or designee, shall signal evacuation to BSC personnel by sounding a facility alarm and verbally announcing the evacuation. Personnel evacuate in an orderly fashion to the

designated assembly location directly across from the main access gate on West Second Street.

The police and fire departments are informed of evacuation immediately upon accounting for all employees and visitors at the assembly location. All facility personnel are to remain at the assembly location and await instructions from police and fire personnel or the emergency coordinator, as appropriate.

BSC exits are clearly marked, and employees are made familiar with all evacuation routes, which are marked on **Figure H-1**. Evacuation drills are conducted at the BSC on an annual basis, and **Figure H-1** is posted throughout the facility.

H - 8.0 EQUIPMENT OR POWER FAILURE

In the event of an equipment or power failure, all effected waste management operations are halted. If an extended outage is anticipated, deliveries may be rerouted to another Service Center.

H - 9.0 EMERGENCY EQUIPMENT

The BSC maintains an adequate supply of emergency response equipment and containers for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other waste material that may result from responding to a release, fire, or explosion.

The following emergency equipment is available at the BSC as specified in **Figure G-1** (Preparedness). This equipment is inspected once per week pursuant to **Appendix E** (Inspections):

Eye Wash Stations - The eye wash stations are located near the warehouse building, tank farm, and metal shelter storage area.

Emergency Shower - An emergency shower is located on the return and fill station dock.

Fire Extinguishers - The BSC has 10-pound dry chemical extinguishers located throughout the facility. Additionally, the warehouse flammable storage area and the

metal shelter storage areas are equipped with dry-chemical fire suppression systems.

Respiratory Protection Equipment - Employees with waste management duties are provided and fit-tested for respirators appropriate for the materials managed.

Spill Cleanup Equipment - 30-gallon Spill Kits containing:

- 13 – Sorbent Socks
- 1 – Dike
- 40 – Sorbent Pads
- 5 – Sorbent Pillows
- 10 – Poly Bags and Ties
- 6 – Tamper Proof Labels

Shovels, sorbents (e.g., granular sorbent, pads, boom), and empty containers are available to control and collect spills and spill residues.

First Aid Kit - A First Aid Kit is centrally located in the BSC that contains disinfectant, bandages, and other medical supplies appropriate for treating minor injuries.

Hand-held Pump - To collect and transfer spilled liquid materials.

Communication Equipment – Telephones with loudspeaker/paging systems and alarms are available in the warehouse building for internal and external communications. An intercom system is also available and may be activated by dialing #6 on any facility landline phone.

Decontamination Equipment - Decontamination equipment is kept on site (pressure washer, degreaser, liquid cleaner, neutralizer) for decontamination of cleanup equipment.

H - 10.0 REPORTING REQUIREMENTS

The Emergency Coordinator (or designee) shall immediately report implementation of the Contingency Plan to the Agency and be prepared to provide the following information:

- a. Name and telephone number of reporter;
- b. Name, address, and telephone number of the facility;
- c. Time and type of incident;
- d. Name and quantity of material(s) involved, to the extent known;

- e. Extent of injuries if any; and
- f. The possible hazards to human health or the environment outside the facility.

The Emergency Coordinator (or designee) shall notify the Agency, prior to resuming operations, when cleanup procedures are completed, and all emergency equipment is cleaned and restored to a useable condition.

The Emergency Coordinator shall document the time, date, and details of any incident that requires the implementation of the Contingency Plan. Within 10 days of the incident, a written report, detailing the circumstances of any incident that requires the implementation of the Contingency Plan, will be submitted to the Agency. The report must include:

- Name, address and telephone number of the owner or operator;
- Name, address and telephone number of the facility;
- Date, time and type of incident;
- Name and quantity of material(s) involved;
- Extent of injuries, if any;
- Description of response activities;
- An assessment of actual or potential hazards to human health or the environment, as applicable;
- The likely route of migration of any release;
- If a release occurred, a summary of any impacts to surrounding soil;
- Results of monitoring and sampling;
- Proximity to down gradient drinking water supplies, surface water, and populated areas;
and
- Estimated quantity and disposition of recovered materials that result from the incident.

H - 11.0 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

A copy of the Contingency Plan is maintained at the BSC and is updated when there are changes

to the facility that affect the Plan. Copies of the Contingency Plan and any revisions are provided to the local authorities and organizations listed in **Section 2.0**.

The Contingency Plan is reviewed and, if necessary updated, whenever:

- The BSC hazardous waste facility permit is amended;
- The list of emergency equipment changes;
- The BSC changes in its design, construction, operation, maintenance, or other circumstances in a way that increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- The list of emergency coordinators changes; or
- The Contingency Plan is implemented.

FIGURE H-1
SITE PLAN - EMERGENCY EVACUATION ROUTES

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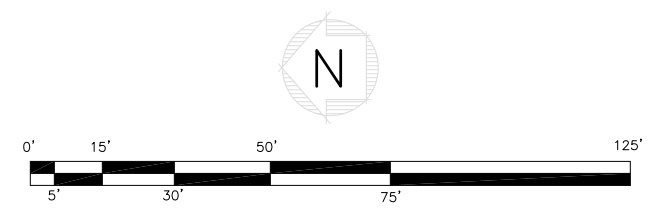
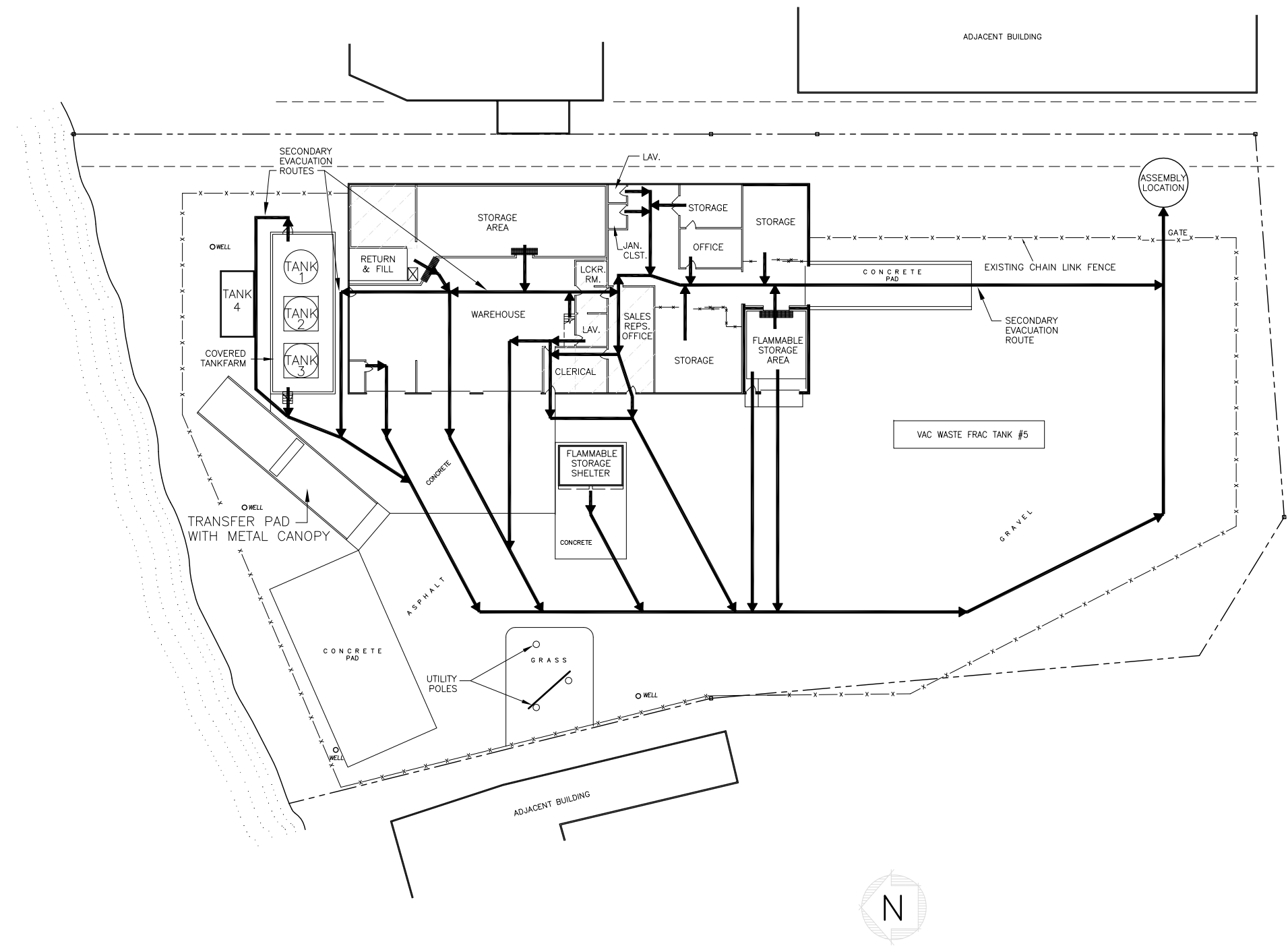


FIGURE H-1

LEGEND

→ EVACUATION ROUTE

GENERAL NOTES

TANK LEGEND

TANK NO.	TANK VOLUME	TANK CONTENTS	REMARKS
1	15,000 USG	USED OIL	VERTICAL TANK
2	15,000 USG	USED OIL	VERTICAL TANK
3	15,000 USG	USED MINERAL SPIRITS	VERTICAL TANK
4	12,000 USG	CLEAN MINERAL SPIRITS	HORIZONTAL TANK
5	18,000 USG	VAC WASTE	HORIZONTAL FRAC TANK

NO.	DESCRIPTION	BY	CHK	APPR	DATE
F	REVISE TANKS AND FIGURE NO.	JEK	DS	DS	091621
E	TANK 2 CONVERTED TO USED OIL	JEK	MH	MH	102710
D	REVISED FOR PART B PERMITTING	JEK	MH	MH	090204
C	ADDED TANK 4 - REMOVED NON-HAZ SHED	MBH	KJM	DP/DD	010897
B	ADDED TRANSFER PAD W/ METAL CANOPY, ADDED CONCRETE ADS, RELOCATED FENCE	MCO	KJM	DP	053096
A	RELEASED FOR PART "B" PERMIT	MBH	KJM	-	100792

SITE PLAN SHOWING EMERG. EVACUATION ROUTES - EXISTING

SAFETY-KLEEN SYSTEMS, INC.
 2600 N CENT EXPRESSWAY STE 400 RICHARDSON, TX. 75080
 PHONE 800-669-5740

SCALE 1"=20'-0"	BY MBH	CHKD KJM	APPROVED DP	EHS -	DATE 10-07-92
SERVICE CENTER LOCATION BARRE, VT			SC-DWG NUMBER 7015-SP00-002	REV. NO. F	