

Appendix F: Procedures to Prevent Hazards

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F-1 Security

F-1a Security Procedures and Equipment

The Electrical Maintenance Facility has sufficient security procedures and equipment to minimize the possibility of unauthorized entry of persons or livestock which may enter the active portion of the facility. Waste storage areas are locked during non-operating hours and the facility and yard are illuminated at night to deter vandalism.

F-1a(1) 24-hour Surveillance System

The facility has an exterior 24-hour video surveillance system.

F-1a(2) Barrier

The Electrical Maintenance Facility is surrounded by a six-foot high chain link fence on the north and east sides. The East Creek and the Otter Creek serve as natural barriers on the south and west sides respectively.

F-1a(3) Means to Control Entry

Entry to the Electrical Maintenance Facility is controlled by a sliding chain link gate which is open during normal working hours and locked after 4:00 p.m. There is also a swing gate on the abandoned railroad entrance that is locked at all times.

F-1a(4) Warning Signs

Warning signs are posted at every entrance to the hazardous waste container storage area. The legend on the signs reads: KEEP OUT- HAZARDOUS WASTE STORAGE FACILITY - AUTHORIZED PERSONNEL ONLY.

The drum storage area is posted with NO SMOKING signs.

Signs are written in English and are legible from a distance of 25 feet.

Entrances to all areas where PCB are stored are marked with PCB markers in accordance with 40 CFR 761.45.

F-1b Waiver

No waiver is required.

F-2 Inspection Schedule

The inspection plan establishes procedures and schedules for monitoring and inspecting the hazardous waste storage facility.

F-2a General Inspection Requirements

Monthly, enter the drum storage area and inspect the fire extinguisher. Check to see that the seals are present and in place. Update the inspection tag with the date of inspection and inspector's signature.

Monthly, inspect the spill kit drum and be sure the drum is easily accessible and the inventory sheet is attached to the drum. Check to see if the drum seal is present and unbroken. If the seal

is broken, inventory the contents of the drum using the inventory sheet attached to the drum and replenish the contents of the drum if necessary and then reseal.

F-2a(1) Container Inspection

Daily, look at stored drums and inspect for leaks around lids, bungs, flanges, and rims. Check lids and bung plugs for tightness. Overpack any drum showing evidence of leaking, swelling or significant corrosion.

Daily, look at both drum containment areas and inspect for cracks, flaking, chips, or gouges in the concrete. Check for liquid in the containment areas and the containment sumps. Check the steel deck over the containment areas for signs of wear or distortion. Clean or decontaminate any residue in the containment area and find the source of contamination.

Daily, inspect stored batteries. Check to see that batteries are stored neatly and are clean and dry.

File completed inspection logs in the Facility Operating Record. Container Inspection Procedures are provided in **Appendix F, Attachment F1**.

F-2a(2) Tank System Inspection

Hazardous waste is not stored in tanks.

F-3 Equipment Requirements

F-3a Internal Communications

Internal communications at the waste storage facility are accomplished through a combination of voice and telephone communication and fire alarms. Processes at the facility do not produce a high volume of noise and voice communication will be effective during an emergency.

Fire alarm pull stations are located in the following places:

- south exit
- northwest exit
- north exit
- drum storage area
- tank storage area
- pump room

Fire alarm pull stations activate an alarm and blinking lights that are located at seven points throughout the facility. The fire alarm is connected directly to the Rutland City Fire Department. GMP's Facilities Department ensures the building fire alarm system is checked annually.

F-3b External Communications

There are telephones located at various points throughout the facility. These telephones can be used throughout the facility. The telephones can be used to dial direct for outside emergency assistance or to call the GMP Control Center which can summon emergency assistance. Cellular service is adequate for use of mobile phones throughout the facility.

F-3c Emergency Equipment

Portable fire extinguishers, spill control, and decontamination equipment are positioned in the facility. A complete list of emergency equipment is provided in **Appendix G – Contingency Plan**.

F-3d Water for Fire Control

A municipal fire hydrant is located on the property at the entry gate. Hydrostatic testing indicates a static pressure of 143 pounds per square inch with a six-inch main. This information was provided by the Rutland City engineer at the time the hydrant was installed.

F-3e Aisle Space Requirements

Two feet of aisle space is maintained between rows of drums in the drum storage area. The aisle space allows unobstructed movement of personnel and equipment around the drums in the storage area.

F-4 Preventive Procedures, Structures, and Equipment

Drummed hazardous waste is unloaded directly onto the facility loading dock either by hand truck, forklift, or hoist. A dock leveler is located at the south end of the loading dock and provides a level platform for unloading trucks. A two-ton hoist is located on the west side of the loading dock and is used for handling drums or electrical equipment which cannot be unloaded with a hand truck or forklift.

F-4a Run-Off

The container storage area is indoors and does not have run-off.

F-4b Water Supplies

The sole source of water used at the facility is from the City of Rutland municipal supply. A six-inch line enters the site from the north side of the facility and then reduces to a four-inch line after the fire hydrant. There are no known groundwater wells on site or within a quarter mile radius of the facility.

F-4c Equipment and Power Failure

There are no control systems or devices that could cause problems during a power outage or that require power to be maintained during a power outage.

F-4d Personal Protective Equipment

Eyewash stations, acid burn stations, chemical resistant aprons, and showers are located at the facility. Refer to **Table F1 - Personal Protective Equipment** for a list of available equipment and locations.

Disposable protective clothing such as gloves, over suits, over boots, and goggles are available in areas where wastes are handled and stored. Protective clothing worn during spill cleanup is disposed of as a hazardous waste if contaminated.

Operating personnel attend monthly safety meetings for instruction in various safety procedures such as the proper use of hard hats, protective shoes, forklift operation, etc.

Table F1: Personal Protective Equipment

EQUIPMENT	APPROPRIATE USE	LOCATION
Eyewash Station	Permanently installed. Used for flushing eyes	Room 106, door 107 Room 201, door 210 Room 206
Chemical Burn Kit	One quart of buffer solution. Used for neutralizing acid or alkaline chemical burns from batteries	Room 201 Room 206, door 104
Protective Clothing	Disposable Tyvek over suits and boots, rubber gloves. Used for personal protection in spill response	Room 117, door 117A Room 106, door 102 Container Storage Area Tank Storage Area
Chemical Aprons	Used to prevent acid or alkali burns when servicing or handling batteries	Room 201 Room 204
Eye Protection	Eye protection. Used for servicing and handling batteries	Room 201 Room 104
Showers	May be used for general decontamination	Room 220 Room 115

Key:

- Room 104: Gas turbine battery charging room
- Room 106: Transformer Shop
- Room 117: Tank T6 and T7 Room
- Room 201: Electrical Maintenance Battery Charging Room
- Room 206: Electrical Maintenance Shop
- Room 220: Men's Locker Room
- Room 115: Women's Locker Room

Attachment F1 Container Inspection Procedure and Checklist

OP 610 Transformer Shop	GREEN MOUNTAIN POWER Support Operations/Hazardous Materials	DATE: 2/11/92 REV: 07/17/12 INITIALS:
SUBJECT: OPERATING PROCEDURE 610; Hazardous Waste Storage Facility inspection log for the drum storage area.		

GENERAL: As a condition of GMP’s Hazardous Waste Storage Facility permit, it must ensure that daily inspections are performed to identify malfunctions, deterioration, operating errors, and inadvertent discharges from its oil handling and storage system.

PROCEDURES: Using the inspection points listed below and the matrix on page two of this procedure, perform the following inspection daily:

LOCATION/ Item	PROBLEM/ What to look for
1. DRUM STORAGE AREA/	1. LEAKS, MISSING SIGNS AND EQUIPMENT
a. Drum integrity	a. Look for wet spots around bungs, flanges, rims. Drums should not be swollen, bulged or corroded.
b. Drum storage	b. Drums must be on pallets and drum labels and marks must be easily visible.
c. Containment	c. Look for cracks in the concrete. Check containment sump for liquids.
d. Warning signs	d. Look for “KEEP OUT-HAZARDOUS WASTE STORAGE FACILITY-AUTHORIZED PERSONS ONLY” signs posted at the north and south side of the drum storage building.
e. Spill kit	e. Look to see if the kit’s seal on the lid is broken. If seal is broken or missing, inventory contents using the kit’s attached inventory sheet. Replace contents as necessary.
f. Aisle Space	f. Look to see that there is two feet of aisle space between pallets and between pallets and walls.
g. Batteries	g. Check to see that batteries are clean, dry, and stored neatly on pallets.
h. Bib and gloves	h. Protective bib and gloves must be present.

Operating Procedure 610, continued.

Date\time -satisfactory = X -Note "REMARKS" on page 3 of form as needed.																						
DRUM STORAGE																						
Drum integrity																						
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Operating Procedure 610, continued.

DATE	REMARKS