A.7 Contingency Plan

MICHIGAN DISPOSAL WASTE TREATMENT PLANT (MDWTP)
MID 000 724 831
2016 PERMIT APPLICATION

FORM EQP 5111 ATTACHMENT TEMPLATE A7
CONTINGENCY PLAN

This document is an attachment to the Michigan Department of Environmental Quality's (DEQ) *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities.* See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), R 299.9501, R 299.9508(1)(b), R 299.9504(1)(c), R 299.9521(3)(b), R 299.9607, and Title 40 of the Code of Federal Regulations (CFR) §§264.50 through 264.56, and 270.14(b)(7), establish requirements for contingency plans at hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003. This license application template addresses requirements for a contingency plan at the hazardous waste management facility for the *Michigan Disposal Waste Treatment Plant (MDWTP)* in *Belleville*, Michigan. It is recommended that *MDWTP]* perform annual drill exercises with the local fire department and emergency responders using the contingency plan to make sure all staff are familiar with the plan and determine whether the plan needs any updating.

(Check as appropriate)

☒ Applicant for Operating License for Existing Facility

☐ Applicant for Operating License for New, Altered, Enlarged, or Expanded Facility

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INTRODUCTION

This Contingency Plan has been prepared in accordance with the requirements of 40 CFR, Part 264, Subpart D, and R 299.9607. The information provided in this section serves as the actual Contingency Plan to be used by the facility. All sections of this template are completed with these functions in mind.

A7.A BACKGROUND INFORMATION

A7.A.1 PURPOSE OF THE CONTINGENCY PLAN

[R 299.9607 and 40 CFR §§264.51 and 264.53]

This Contingency Plan has been prepared in accordance with the requirements of 40 CFR, Part 264, Subpart D, and R 299.9607. It is designed to establish the necessary planned procedures to be followed in the event of an emergency situation at the Michigan Disposal Waste Treatment Plant and Wayne Disposal Inc. facility in Belleville, Michigan, such as a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or water.

This RCRA Contingency Plan is a part of the overall effort at the facility to predict, prevent, and properly respond to incidents. This RCRA Contingency Plan satisfies RCRA requirements for responses to emergencies involving hazardous waste. The provisions of this plan will be carried out whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

Copies of the Contingency Plan have been provided to emergency response agencies in order to familiarize them with the facility layout, the properties of the material handled, locations of the working areas, access routes into and within the facility, possible evacuation routes from the facility, and types of injuries or illness that could result from releases of materials at the facility. This information has been submitted to emergency response and regulatory agencies listed n A7.D.1.

A7.A.2 DESCRIPTION OF FACILITY OPERATIONS

Michigan Disposal Waste Treatment Plant (MDWTP)

The MDWTP operations include receiving, storage, and treatment of hazardous wastes permitted by the MDEQ under the facility operating license and the USEPA under a Resource Conservation and Recovery Act (RCRA) permit (MID 000 724 831).

The specific routine operations and work areas for MDWTP include:

- Waste receiving & quality control(QC)
- Waste loading/unloading
- Reagent unloading & tank storage
- Waste storage in tanks

- Waste treatment in tanks
- Container staging & storage and
- Shipment of waste off-site to permitted treatment, storage, and disposal facilities (TSDFs)

The requirements for operations in these areas are defined in and regulated by the facility operating license.

Waste Identification and Classification - MDWTP
The waste types acceptable for treatment and storage at the facility are defined in Part 111 of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451 (Act 451) and 40 CFR regulations at part 261. The waste types acceptable for treatment include listed, characteristic and non-hazardous waste as approved by the facility permit.

Description of Waste Management Units - MDWTP
The MDWTP facility is a liquid and solid hazardous & non-hazardous waste storage and treatment facility. Containerized wastes may be stored on-site before and after treatment in one of five hazardous waste storage areas: the North Container Storage Area (NCSA), the East Container Storage Area (ECSA), the Southeast Container Storage Area (SECSA) and the East and West Treatment Building Bays. The facility is equipped with pollution control systems for particulate, odor, and emission control.

Liquid hazardous wastes to be treated in the pozzolanic stabilization process may be stored in four, 20,000 gallon and vertical storage tanks (T-16 through T-19). Liquid reagents are stored in two, 15,000 gallon vertical tanks (T-25 and T-27). Hazardous Waste dust may be stored in three 100 cubic yard (cy) silos of the plant. Lime kiln flue dust, cement kiln flue dust, and lime are also used for stabilization and may be used in all six silos (T-1 through T-6). The dusts are conveyed from the silos to the treatment tank via a screw conveyor at a controlled rate to effect treatment of liquid and solid wastes. Other reagents, such as ferrous sulfate, may be added directly to the tanks in bag or bulk quantities.

Listed and characteristic hazardous wastes are stored and treated in tanks. Treatment consists of mixing and treating directly in the storage/treatment tanks. Other chemical reagents may be selectively added in drum or bulk quantities.

Containerized hazardous waste and non-hazardous wastes are staged and stored on concrete pads at the NCSA, ECSA, SECSA and the East and West Treatment Building Bays. Drainage trenches constructed within the containment areas contain and control liquid runoff. Drums are transported from the pad into the plant using a barrel forklift. They are opened carefully by removing the tops or bungs and emptying the contents with a vacuum truck or pouring contents directly into treatment tanks using the barrel forklift. The empty drums are placed into a roll-off box or other similar container for subsequent disposal or managed through the treatment tanks.

The disposal operations are supported and directed from the office/lab and waste receiving site located near the entrance to the facility. These support operations assist to control and evaluate shipments received for conformance with pre-approval information regarding the specific

properties, treatment, and documentation requirements. The facility waste characterization and analysis records are maintained on-site.

Wayne Disposal, Inc. Site #2 (WDI)

The WDI operations include the landfill disposal of hazardous and non-hazardous wastes permitted by the MDEQ under the facility operating license USEPA under a Resource Conservation and Recovery Act (RCRA) permit (MID 048 090 633).

The specific routine operations and work areas for WDI include:

- Waste receiving and quality control
- Waste unloading
- Hazardous waste landfill and related appurtenances (piping, pumps, operation and maintenance, truck wheel wash buildings located within the area bounded by North Interstate 94 (I-94) Service Drive and Willow Run Airport)

The requirements for operations in the landfill is defined in and regulated by the Hazardous Waste Treatment, Storage and Disposal Facility operating license. Non-hazardous wastes are managed in accordance with the facility's Part 115 of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451 (Act 451). The WDI landfill is located at the same site as MDWTP treatment and storage facility (MID 000 724 831). WDI landfill disposal operations are supported by office/lab and waste receiving operations located near the entrance of the facility. These operations assist to control and evaluate shipments received for conformance with pre-approval information regarding the specific properties, treatment, and documentation requirements. The WDI facility waste characterization and analysis records are maintained.

Waste Identification and Classification - WDI

The waste types acceptable for disposal at the facility are defined in Parts 111 and 115 of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451 (Act 451) and 40 CFR Regulations at Part 261. Acceptable hazardous waste codes are identified in Section 8 of the Hazardous Waste Treatment, Storage and Disposal Facility Operating License.

The facility (WDI) license has specific restrictions regarding the following waste types NOT ACCEPTABLE for disposal:

- Ignitable wastes as described in Michigan Act 451 rule R 299.9212
- Reactive wastes as described in Michigan Act 451 rule R 299.9212
- Bulk or non-containerized liquid waste or waste containing free liquids
- Containers holding free liquids, including laboratory packs
- Wastes which are banned from landfilling by regulations promulgated under 40 Code of Federal Regulations (CFR) Part 268 unless the wastes meet the applicable Land Disposal Restriction (LDR) treatment standards or a variance has been obtained from the USEPA
- Waste which will:
    - (1) Adversely affect the permeability of the clay liner.
    - (2) Produce a leachate that is incompatible with the clay liner, leachate collection system piping, or the off-site sewer system.
    - (3) Generate gases that will adversely affect the permeability of the clay cap or create a

violation of the air pollution control requirements of Part 55 of Act 451.

Description of Waste Management Units - WDI
The WDI facility includes an active permitted hazardous waste landfill with primary and secondary liner systems, a leachate collection and removal system, and a leak detection, collection and removal system. The landfill operations also include run-on, run-off, and contaminant control systems including a vehicle wash facility and other landfill-related equipment and support buildings.

A7.A.3 IDENTIFICATION OF POTENTIAL SITUATIONS

Potential situations that could occur based on the nature of the industry include fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or water.

A7.B EMERGENCY COORDINATORS
[R 299.9607 and 40 CFR §§264.52 and 264.55]

A7.B.1 IDENTIFICATION OF PRIMARY AND ALTERNATE EMERGENCY COORDINATORS
[R 299.9607 and 40 CFR §§264.52 and 264.55]

At all times there is at least one employee, either on the facility premises or on call and within reasonable travel distance of the facility, with the responsibility for coordinating all emergency response measures. The list of employees designated as emergency coordinators is contained in Table A7.B.1. The coordinators are listed in the order in which they will assume responsibility.

A7.B.2 QUALIFICATIONS OF THE EMERGENCY COORDINATORS
[R 299.9607 and 40 CFR §264.55]

Emergency coordinators are management personnel knowledgeable and fully qualified for the responsibility of executing the Contingency Plan. Coordinators are familiar with the facility's operations and activities, and how these operations and activities are impacted by RCRA obligations.

Table A7.B.1 Identification of Primary and Alternate Emergency Coordinators

Michigan Disposal Waste Treatment Plant
49350 North I-94 Service Drive
Belleville, MI 48111

Priority	Name		
Primary Coordinator	Corey Grider	734-699-6213	734-576-0143
Primary Coordinator	Kerry Durnen	734-699-6265	734-576-0189
Alternate Coordinator	Jasen Campbell	734-699-6214	734-589-9653
Alternate Coordinator	Mike Rohde	734-699-6226	734-431-1005

Wayne Disposal Inc.

Priority	Name		
Primary Coordinator	Kerry Durnen	734-699-6265	734-576-0189
Primary Coordinator	Michael Porath	734-699-6239	734-576-0179
Alternate Coordinator	Ken Weber	734-699-6280	734-576-0153

A7.B.3 AUTHORITY TO COMMIT RESOURCES
[R 299.9607 and 40 CFR §264.55]

The Emergency Coordinator is authorized to commit any necessary resources of the company that may be needed to carry out this Contingency Plan.

A7.C IMPLEMENTATION OF THE CONTINGENCY PLAN
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The primary emergency coordinator or an alternate must be contacted immediately upon discovering a situation that may result in potential or actual threats to human health or the environment. This plan will be implemented as necessary whenever there is a fire, explosion, or release of hazardous substances that could threaten human health or the environment. Spills and releases into secondary containment or contained on pavement are not considered a threat to human health and the environment and will not require the implementation of the Contingency Plan or notification to regulatory agencies.

The provisions of this plan will be partially or fully carried out whenever one of the following conditions occurs:

- Fire and/or explosion:
  - A fire involving hazardous waste or hazardous materials that could threaten human health or the environment.
  - 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 mobilization of the Van Buren Fire Department 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 that could threaten human health or the environment.
  - A spill that results in the release of toxic liquids or fumes that could threaten human health or the environment.
  - A hazardous materials spill that cannot be contained inside the facility and exceeds the Reportable Quantity for the offsite portion of the release.

A partial implementation is appropriate when the facility has the resources to address the situation without an off-site agency for emergency response.

A7.D EMERGENCY PROCEDURES

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The following general procedures have been established for implementation by facility personnel and the emergency coordinator in order to efficiently respond to the release of hazardous waste or hazardous waste constituents that could threaten human health or the environment. The facility's procedure for assessing offsite risk during and after a significant release is provided in Attachment A7.4.

All MDWTP and WDI personnel are instructed to respond, in case of emergency, as follows:

1. If any person has been seriously injured call 911 for EMT support.
2. Alert the shift supervisor or the emergency coordinator of the hazard(s).
3. f any persons in the immediate area are potentially endangered, advise them to leave immediately.
4. Contact the Emergency Coordinator(s) in person, by radio or phone
5. Indicate nature of emergency and stand by to receive instructions from Emergency Coordinator or evacuate.
6. Shut down, as necessary, all processing and ancillary equipment per manufacturer's instructions, associated with the incident.

The Emergency Coordinator will direct actions of all facility personnel to:

1. Identify hazards and assess extent of potential harm to human health or the environment.
2. Notify, as necessary, the appropriate Emergency Response Contacts listed in this Plan.
3. Respond in cooperation with outside agencies to minimize hazards.
4. Follow up response actions with required reports (verbal and written). This includes internal incident reports and providing information to regulatory staff to prepare the incident report(s).

A7.D.1 NOTIFICATION PROCEDURES FOR FACILITY PERSONNEL AND STATE AND LOCAL AGENCIES WITH DESIGNATED RESPONSE ROLES

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The list of emergency contacts in Table A7.D.1 identifies local emergency response agencies, and state and federal authorities that may be notified in the event of an imminent or actual emergency situation requiring their response.

The emergency coordinator will be responsible for ensuring that all appropriate authorities are notified as necessary by phone, in person, or by mail.

Table A7.D.1 Federal, State, and Local Response Contacts

Local Emergency Response	Address	Phone Number
*Van Buren Township Police Department	46425 Tyler Road Belleville, MI 48111	911 or 734-699-8930
*Van Buren Fire Department	46425 Tyler Road Belleville, MI 48111	911 or 734-699-8930
Huron Valley Ambulance (Emergency)	1200 State Circle Ann Arbor, MI 48108	734-994-4111
Local Emergency Planning Commission (LEPC)	10250 Middlebelt Road Detroit, MI 48242	734-942-3600
State Emergency Response		
DEQ Pollution Emergency Alert System		800-292-4706
Federal Emergency Response		
National Response Center		(800)292-4705
Local Notification	**Agency**	**Phone Number**
Director of Planning and Economic Development	Van Buren Township	800-292-4706

State Notification		Phone Number
Michigan Disposal OWMRP-Lansing	MDEQ	517-284-6574
Wayne Disposal OWMRP-Lansing	MDEQ	517-284-6568
OWMRP District	MDEQ	586-753-3839
AQD District	MDEQ	313-456-4680

Federal Notification	Phone Number
USEPA Region V	312-886-7890

*Notification to Local Emergency Planning Committee (LEPC)

Injury or Harm to Human Health

1. Van Buren Fire Department (They will dispatch Huron Valley Ambulance)
2. Determine what medical facility Huron Valley Ambulance will transport individuals to.
3. Assist the appropriate officials with necessary information needed to inform the medical facility of the situation including precautions taken to transport individual(s).

If the Emergency Coordinator determines the facility has had a release, fire, or explosion which could threaten human health or the environment outside the facility, such findings will be reported in accordance with Rule 607 as follows:

Fire or Explosion

4. Van Buren Fire Department
   - Assist the appropriate officials in deciding the following
     - Need for other response agency involvement
     - Evacuation is necessary. If so the extent of the evacuation. (According to R 299.9607 and 40 CFR 264.56(d), the decision making authority to evacuate the local areas belongs to the appropriate local authorities based on facility's evaluation of the release.)
5. National Response Center immediately if extremely hazardous substance or hazardous substance or constituent in a mixture, is greater than or equal to reportable quantity.
6. DEQ Office of Waste Management and Radiological Protection (OWMRP). If DEQ authorities cannot be reached contact Pollution Emergency Alert System.
7. DEQ Air Quality Division (AQD) if exceeding hazardous air pollutant or toxic air contaminant emissions, as soon as possible, but no later than 2 business days.

Spill or Release Off-Site

Hazardous Substance Released Off Site Greater than Reportable Quantity

1. National Response Center (NRC will send a report to LEPC, as well as the DEQ)
2. Van Buren Fire Department and/or Van Buren Police Department
3. DEQ Office of Waste Management and Radiological Protect (OWMRP). If DEQ authorities cannot be reached contact Pollution Emergency Alert System.
4. If the offsite portion of the release exceeds 10 lbs. of a substance containing PCBs at a concentration ≥50ppm, contact EPA Region V TSCA as soon as possible, but no later than 24 hours.

If it is determined the facility has had an onsite release, which could threaten human health or the environment such findings will be reported as follows:

Spill or Release On-Site
Hazardous Substance Greater than Reportable Quantity

1. DEQ Office of Waste Management and Radiological Protect (OWMRP). If DEQ authorities cannot be reached contact Pollution Emergency Alert System.

If the Emergency Coordinator determines the facility has had a release inside the facility, they will report such findings and act as defined in A7.D.2 through A7.D.8.

A7.D.2 PROCEDURES TO BE USED FOR IDENTIFICATION OF RELEASES
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The Emergency Coordinator will identify the character, source, amount and extent of any released materials. They may do this by observation and/or review of the facility records or manifests, and if necessary, by chemical analysis.

A7.D.3 PROCEDURES TO BE USED TO ASSESS POTENTIAL HAZARDS TO HUMAN HEALTH AND THE ENVIRONMENT
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The Emergency Coordinator must 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-off from water or chemical agents used to control fire and heat-induced explosions), and will be based on the following criteria:

- 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

A7.D.4 PROCEDURES TO DETERMINE IF EVACUATION IS NECESSARY AND NOTIFICATION OF MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM AND THE NATIONAL RESPONSE CENTER
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

If the emergency coordinator's assessment indicates that evacuation of facility areas may be advisable, they will implement the evacuation plan for the facility. Isolation distances and evacuation requirements are dependent on the nature and magnitude of the spill. The evacuation

point will be communicated to all on-site personnel, and entrance to the facility will be limited. The facility's evacuation plan is included in this Contingency Plan as Attachment A7.2.

If their assessment indicates that evacuation of the surrounding local areas is also advisable, the appropriate local authorities will be notified (see Table A7.D.1). The National Response Center and the DEQ's Pollution Emergency Alerting System (PEAS) will also be notified (see Table A7.D.1), and the following information will be provided:

1. Name and telephone number of the reporting individual
2. Name and address of the facility
3. Time and type of incident
4. Type and quantity of materials involved
5. Possible hazards to human health or the environment
6. Extent of injuries, if applicable

A7.D.5 PROCEDURES TO BE USED TO ENSURE THAT FIRES, EXPLOSIONS, AND RELEASES DO NOT OCCUR, REOCCUR, OR SPREAD DURING THE EMERGENCY

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(e), 264.227, and 264.200]

Whenever there is an imminent or actual emergency situation where the potential or actual release of hazardous waste or hazardous waste constituents may threaten human health or the environment, the facility will implement the following procedures: stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

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 facility. Actions that may be employed where applicable: stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

Attachment A7.3 is a detailed description of all emergency equipment at the *MDWTP/WDI* facility.

A7.D.6 PROCEDURES TO BE USED TO MONITOR EQUIPMENT SHOULD FACILITY OPERATIONS CEASE

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(f)]

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, whenever this is appropriate.

A7.D.7 PROCEDURES TO PROVIDE PROPER TREATMENT, STORAGE, AND DISPOSAL FOR ANY RELEASED MATERIALS

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(g)]

After an emergency, staff will ensure proper treatment, storage and disposal of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

A7.D.8 Procedures for Cleanup and Decontamination
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(h)]

MDWTP/WDI will implement the necessary cleanup efforts. The following steps will be taken to minimize the impact of the release and clean up impacted material:

1. Isolate the area of the release to prevent contact with unnecessary personnel and prevent migration of the release.
2. Determine the characteristics of the spilled waste for any special handling requirements.
    - If flammable materials are involved, possible sources of ignition will be eliminated in order to prevent fire risk.
3. If feasible and safe, stop the release at the source.
4. Determine the extent of the release including any subsurface exposure.
5. Remove any available spilled waste.
6. Decontaminate impacted non-disposable surfaces and equipment.
7. Properly contain, label, characterize, and dispose of waste generated from remedial activities.
8. Where soil has been contacted by a spill, collect and analyze samples to verify impacted soil has been removed.

A7.E RESUMPTION OF OPERATIONS AND RECORD KEEPING REQUIREMENTS
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(h) and (i)]

The following subsections identify procedures that must be followed to meet the notification and record keeping requirements.

A7.E.1 PROCEDURES TO BE USED PRIOR TO RESUMING OPERATIONS
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(h)]

Prior to resuming operations in the affected area(s), MDWTP/WDI will inspect all emergency equipment to ensure that the proper cleanup procedures have been implemented and all equipment has been cleaned and is fit for its intended use.

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

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

Notification must be given to the Regional Administrator, and appropriate state and local authorities, that the facility has taken the necessary steps to prevent and prepare for future incidents (as described in 40 CFR 264.56(h)) before operations are resumed in the affected area(s) of the facility.

A7.E.2 RECORD KEEPING REQUIREMENTS

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(i)]

A7.E.2(a) Operating Record

In the event of an emergency situation that requires implementation of the Contingency Plan, the emergency coordinator will record in the operating record the time, date, and description of the event. The operating record is maintained by *MDWTP/WDI* and can be found at the following location: *49350 North I-94 Service Drive, Belleville, MI 48111*

A7.E(2)(b) Written Incident Report

Within 15 days of an incident requiring implementation of the Contingency Plan, the *MDWTP/ WDI* will submit a written incident report to the DEQ at the following address:

Chief of the Office of Waste Management and Radiological Protection
Department of Environmental Quality
P.O. Box 30241
Lansing, MI 48909

The report will contain the following information:

1. Name, address, telephone number, and site identification number of the facility and the owner/operator.
2. Date, time, and type of incident.
3. Type and quantity of materials involved.
4. Assessment of actual or potential hazards to human health and the environment.
5. Extent of injuries, if applicable.
6. Estimated quantity and disposition of recovered materials that resulted from the incident.

A7.F PROCEDURE FOR ASSESSING OFFSITE RISK DURING AND AFTER A FIRE/EXPLOSION INCIDENT OR SIGNIFICANT RELEASE

[R 299.9521(3)(b) and R 299.9607 and 40 CFR §264.56(d)]

Off-site risk in the event of a significant release of hazardous waste from fire, explosion or other similar incidents shall be evaluated in accordance with OWMRP-111-25

A checklist is provided in section A.7.4

Corrective Action

Corrective actions will be performed based on results of information gathered in previous steps in accordance with Part [_B2_], Corrective Action Information, of this license.

A checklist is provided for in Attachment A7.4.

Any of the actions incorporated into this procedure are to be performed by MDWTP/WDI personnel to the extent possible. However, much of the offsite sampling and monitoring will, in all likelihood, have to be performed by a duly authorized governmental agency as such activities can present legal barriers to Michigan Disposal Waste Treatment Plant and Wayne Disposal Inc.

A7.G PROCEDURES FOR REVIEWING AND AMENDING THE CONTINGENCY PLAN

[R 299.9607 and 40 CFR §264.54]

The contingency plan must be reviewed and amended, if necessary, whenever:

a. The plan fails in an emergency;
b. 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;
c. The list of Emergency Coordinators changes; or
d. The list of emergency equipment changes.

Whenever the Contingency Plan is modified, the Emergency Coordinator(s) must provide the emergency response agencies with a copy of the modified plan. Send these copies with a letter of transmittal, by certified mail, with instructions to destroy all previous copies.

Attachment A7.1 Documentation of Arrangements with Local Authorities

The following are arrangements agreed to by local fire departments, police, hospitals, contractors, state and local emergency response teams to coordinate emergency services.

1) The Primary emergency authority of the local police and fire department is set forth by state and local law or ordinance. The Van Buren Fire Department is deemed the primary emergency contact for situations related to this site's operations. The Van Buren Fire Department will contact other emergency contacts at their discretion. Any others providing support to the primary emergency authority will follow the direction of the local police and fire departments.

2) US Ecology works with the Van Buren Fire Department to maintain familiarity with facility layout and operations for emergency response purposes.

3) All necessary support by emergency response teams, emergency response contractors, and equipment suppliers has been documented in this plan.

4) Information to familiarize hospital staff with the properties of wastes involved in an injury, incident, or illness resulting from fires, explosions, or releases will be provided at the time of response to an incident. Huron Valley Ambulance will designate the hospital equipped to manage the emergency.

No state or local authorities have declined to enter into such arrangements; if such refusal occurs it would be documented.

US ecology

49350 North I-94 Service Drive, Belleville, MI 48111
800.592.5489 800.592.5329

October 28, 2016

Huron Valley Ambulance Service, Inc.
2215 Hogback Road
Ann Arbor, MI 48105

To whom it may concern:

Attached is the most current copy of the Contingency Plan for Michigan Disposal Waste Treatment Plant and Wayne Disposal Inc. This plan outlines the procedures and requirements for addressing an emergency event should one occur at the facility.

The updated plan is being sent to all Emergency Response Agencies listed in the plan in accordance with 40 CFR 264.53(b), to ensure that up to date information is contained in all files. You may dispose of previous version of the Contingency Plan. Please review this data and feel free to contact the facility, with any questions or concerns.

Please sign and return this form acknowledging receipt of the Contingency Plan. If you wish to decline participation as an emergency response agency please provide a separate notification.

Sincerely,

Sylwia Scott
Environmental Manager

sylwia.scott@usecology.com
o 734 [illegible] 8294

✂ -

____________________________________ has received Michigan Disposal Waste Treatment Plant and Wayne Disposal Inc.'s facility Contingency Plan. I understand I am receiving this because I am listed as an agency that may be called to participate in an emergency.

____________________ Printed Name	____________________ Date
____________________ Signature	____________________ Title

49350 North I-94 Service Drive, Belleville, MI 48111
P 800.592.5489 F 800.592.5329

October 28, 2016

Poison Control Center
4707 St. Antoine Street
Suite 302
Detroit, MI 48201

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Printed Name	Date
Signature	Title

49350 North I-94 Service Drive, Belleville, MI 48111
800.592.5489 800.592.5329

October 28, 2016

Van Buren Township Fire Department
46425 Tyler Rd.
Belleville, MI 48111

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_____	_____
Printed Name	Date
_____	_____
Signature	Title

49350 North I-94 Service Drive, Belleville, MI 48111
P 800.592.5489 F 800.592.5329

October 28, 2016

Van Buren Township Police Department
46425 Tyler Rd.
Belleville, MI 48198

To whom it may concern:

Attached is the most current copy of the Contingency Plan for Michigan Disposal Waste Treatment Plant and Wayne Disposal Inc. This plan outlines the procedures and requirements for addressing an emergency event should one occur at the facility.

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Sincerely,

Sylwia Scott
Environmental Manager

sylwia.scott@usecology.com
o. 734.530.6204

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_____	_____
Printed Name	Date
_____	_____
Signature	Title

US ecology

49350 North I-94 Service Drive, Belleville, MI 48111
P 800.592.5489 F 800.592.5329

October 28, 2016

Van Buren Township
46425 Tyler Rd.
Belleville, MI 48111

To whom it may concern:

Attached is the most current copy of the Contingency Plan for Michigan Disposal Waste Treatment Plant and Wayne Disposal Inc. This plan outlines the procedures and requirements for addressing an emergency event should one occur at the facility.

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Sincerely,

Sylwia Scott
Environmental Manager

sylwia.scott@usecology.com
p 734.830.4204

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_____	_____
Printed Name	Date
_____	_____
Signature	Title

49350 North I-94 Service Drive, Belleville, MI 48111
P 800.592.5489 F 800.592.5329

October 28, 2016

Local Emergency Planning Committee
Wayne County of Emergency Management
10250 Middllebelt Rd.
Detroit, MI 48242

To whom it may concern:

Attached is the most current copy of the Contingency Plan for Michigan Disposal Waste Treatment Plant and Wayne Disposal Inc. This plan outlines the procedures and requirements for addressing an emergency event should one occur at the facility.

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Sincerely,

Sylwia Scott
Environmental Manager

sylwia.scott@usecology.com
p 734.699.0294

✂.....

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_____	_____
Printed Name	Date
_____	_____
Signature	Title

Attachment A7.2 Evacuation Plan, Routes, and Maps

Evacuation Procedures

If any employee encounters an emergency situation which they believe to present an imminent threat to human health or the environment, the individual employee is authorized to leave the area immediately and tell others to leave the area immediately.

The attached maps indicate the evacuation routes to the rally points. Primary evacuation routes vary depending on the department's location. It is the responsibility of the department supervisors to inform employees of these evacuation routes and ensure all employees meet at the appropriate rally point in the event of an incident. Alternate evacuation routes may be used because of wind direction or the location of the incident. Supervisors will inform the EC if an alternate evacuation route must be used. The EC will communicate if the conditions of the incident prohibit the alternate route.

Evacuation Routes:

1. Denton Road to the service drive and congregate at that point.
2. Main facility gate to service drive and congregate adjacent to the entrance.
3. East secondary gates to the truck holding lot.

Upon learning of an evacuation notice, the following willoccur:

1. All employees, contractors and visitorswill evacuate in an orderly and safe manner to the designated rally point.
2. If it is safe to do so, each work area will be checked by the area supervisor or designee to ensure everyone has left the area, including contractors and visitors.
3. Department supervisors will conduct a head count and report any missing persons and their suspected locations, if known, to the EC.
4. Based on the situation, the Emergency Coordinator will decide whether to conduct search and rescue using internal personnel or wait for assistance from outside emergency responders.

Employees should not leave their rally point until instructed to do so by the EC, or until a general all clear signal has been communicated

Attachment A7.3 Emergency Equipment Description

Department managers along with the EHS staff are responsible for determining the appropriate emergency equipment for the area and ensuring supplies are maintained. Locations of emergency and decontamination equipment are shown in evacuation figures provided in A7.2.

The following equipment may be included depending on the needs of the area:

- Fire suppression system
- Fire extinguisher
- Fire hydrant
- Spill Kit

Attachment A7.4 Response Actions Checklist

Contingency Plan Activation of Off-Site Release Checklist

Record Incident	
	Time the incident began, duration, and location of the event.
	Employees/witnesses having direct involvement or direct knowledge of the incident.
	Gather local meteorological data and any characteristics noted by personnel directly involved with the incident or recorded elsewhere.
	Extent of injuries if any
Event Narrative	
	Sequence of events and time line leading up to and throughout the incident
	Identify specific event locations, materials, and equipment involved in the incident.
	Identify and characterize, to the extent possible, the size and scope of the event.
	Identify efforts taken to reduce the extent of the release
	Identify clean-up efforts
Materials or Substances Involved	
	Identify all of the materials/substances that may have been involved in the event.
	Determine the volume, concentration, and weight of substances identified above, and determine how they may have been altered by the event.
	Develop a list of constituents that may be a potential concern
OWMRP Notification	
	Within 24 hours of an incident requiring implementation of the Contingency Plan provide verbal notification
	Within 15 days of an incident requiring implementation of the Contingency Plan provide written notification summarizing information above
Post Incident Sampling	
	Develop a sampling plan, as appropriate. The plan may take into account fallout density, air monitoring data, visual observation, or air modeling. A statistical sampling design may not be necessary for the screening evaluation. Post incident, off site sampling may not be necessary based on air monitoring data and lack of off-site migration or deposition.
	Collect a sufficient number of samples to identify and characterize concentrations of substances involved in the incident. Include sampling for background concentrations.
	Complete the analysis of collected samples and review by comparison to relevant screening levels. Screening levels may have to be developed for some chemicals or environmental media.
	Identify and document any substances found to be present at levels that exceed screening levels.
Evaluate Data for Screening Potential Risk	
	Screen existing data against relevant screening levels.
	Prepare risk assessment screening report if appropriate.
	If less than screening levels, no further action is needed for off-site potential releases upon approval of the OWMRP.
OWMRP Notification	