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MD 980 615 298

March 30, 2015

RE: Petro-Chem Processing Group of Nortru, LLC Contingency Plan

To Whom It May Concern:

Please see enclosed updated Contingency Plan for the above facility.

The purpose of this enclosed Contingency Plan is to establish the necessary planned procedures to be followed in the event of an emergency situation such as a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. It is also recognized that no single person or agency can possibly manage a serious hazardous materials incident. Hence, an important part of this plan is to establish the emergency response procedures in such a way as to allocate available resources as efficiently as possible to achieve the primary goal: the preservation of human health and the environment.

The following updates have been made to the Plan:

- Emergency Coordinators
- Parent Company Name

Please feel free to contact me at 313.824.5848 or melanie.frohriep@Stericycle.com for further clarification or comments.

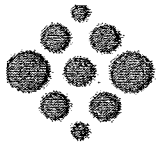
Sincerely,

Petro-Chem Processing Group of Nortru, LLC

Melanie M. Frohriep

Melanie M. Frohriep
Shipping & Receiving Manager

Encl. 1



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CONTINGENCY PLAN

Petro-Chem Processing Group of Nortru, LLC.

Revision 2.5 – 3/30/15

CONTINGENCY PLAN

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A BACKGROUND INFORMATION

The information contained in this section is submitted in accordance with the requirements of 40 CFR Part 264 Subpart D, and as adopted by reference in R 299.9607.

The Petro-Chem Processing Group of Nortru, LLC. ("PCPG") operating office and facility is located in a highly industrialized section of northeastern Detroit. The street address is:

Petro-Chem Processing Group of Nortru, LLC.
421 Lycaste
Detroit, Michigan 48214

The administrative office for the complex is located adjacent to the main plant at:

Nortru, LLC.
515 Lycaste
Detroit, Michigan 48214

1) Purpose

i) The purpose of this stand-alone Contingency Plan is to establish the necessary planned procedures to be followed in the event of an emergency situation and the actions taken to prevent occurrences during operations at the Petro-Chem Processing Group of Nortru, LLC. facility in Detroit, Michigan. Occurrences include: fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil or surface water. The provisions of this plan will be implemented upon the occurrence of a fire, explosion or release of hazardous waste or waste constituents which could threaten human health or the environment. It is also recognized that no single person or agency can possibly manage a serious hazardous materials incident. Hence, an important part of this contingency plan is to establish the emergency response procedures in such a way as to allocate available resources as efficiently as possible to achieve the primary goal: the preservation of human health and the environment. These procedures are not intended for normal, routine clean-up operations which pose no threat to human health or the environment; rather, this Contingency Plan describes the specific actions that facility personnel will take in the event of a fire, explosion or other unplanned occurrence which could impact the health and safety of those personnel at the complex, or in the area surrounding of the complex.

ii) To comply with 40 CFR 264.37 (a) and (b), PCPG issues a copy of its most current Contingency Plan, hazardous material descriptions and operations information to:

iii) City of Detroit Emergency Management Division

iv) Two local emergency response contractors identified in the Contingency Plan Reporting Contact Information – Appendix 1

v) Concentra Medical Clinic

vi) City of Detroit Police Department

vii) City of Detroit LEPC

viii) The City of Detroit Fire Marshall's Division has also conducted a site visit in order to familiarize them with plant operations. See Appendix 6 for verification that these entities have received a copy of this contingency plan. They will also receive a copy of every modified plan.

2) Description of Facility and Operations

i) PCPG is a full service Hazardous Waste Treatment and Storage facility capable of handling a wide variety of waste streams for fuel blending, storage and consolidation.

ii) All process areas have reinforced concrete and are contained. Containment areas are designed to hold at least 150% of the entire contents of the largest vessel inside the containment device.

iii) Bulk materials are stored in tanks located within secondary containment structures. The secondary containment structures are constructed of concrete floor and walls and provide 150% containment of the largest tank.

iv) Containerized materials are managed in multiple areas throughout the facility, including both inside and outside storage. Inside storage is within the buildings with secondary containment provided by the building structure and curbing. Outside storage is within concrete secondary containment typically under canopies.

v) Waste Streams: These waste streams include aerosols, asbestos, batteries, chlorinated hydrocarbons, contaminated soils, contaminated waters, electronic wastes, empty containers, fluorescent bulbs, inorganic acids & bases, lab packs, metals, oils, organic acids, organic liquids, pesticides, pharmaceuticals, rags, solvents and water reactives. PCPG does not accept dioxin, explosive, infectious, PCB or radioactive wastes

Waste Types:

Hazardous Class 2 – flammable, non-flammable and toxic compressed gases

Hazard Class 3 – flammable liquids

Hazard Class 4 – flammable solids, spontaneously combustible solids, dangerous when wet solids

Hazard Class 5 – liquid and solid oxidizers, organic peroxides

Hazard Class 6 – liquid and solid toxic wastes including pesticides

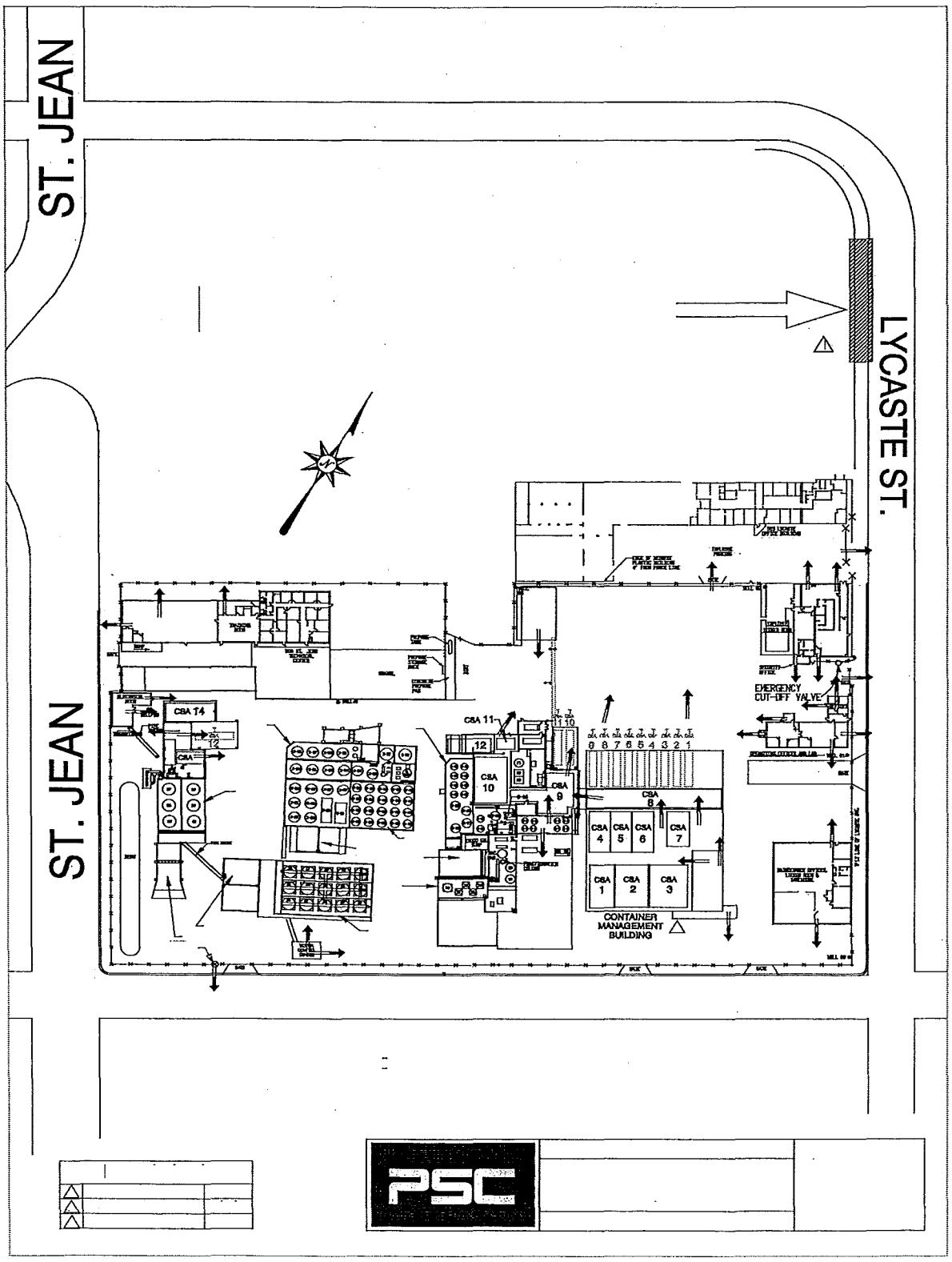
Hazard Class 8 – liquid and solid acids and bases

Hazard Class 9 – liquid and solid environmentally hazardous substances

The types of waste codes handled at PCPG include:
F, K Type – waste from listed nonspecific and specific sources
P, U Type – discarded acutely hazardous & hazardous commercial chemical products
D Type – ignitable, corrosive, reactive and toxic waste

D	F	K			P			U						State
D001	F001	K001	K045	K125	P001	P049	P103	U001	U046	U091	U136	U181	U234	001K
D002	F002	K002	K046	K126	P002	P050	P104	U002	U047	U092	U137	U182	U235	002K
D003	F003	K003	K048	K132	P003	P051	P105	U003	U048	U093	U138	U183	U236	
D004	F004	K004	K049	K136	P004	P054	P106	U004	U049	U094	U140	U184	U237	001U
D005	F005	K005	K050	K141	P005	P056	P108	U005	U050	U095	U141	U185	U238	033U
D006	F006	K006	K051	K142	P006	P057	P109	U006	U051	U096	U142	U186	U239	070U
D007	F007	K007	K052	K143	P007	P058	P110	U007	U052	U097	U143	U187	U240	074U
D008	F008	K008	K060	K144	P008	P059	P111	U008	U053	U098	U144	U188	U243	124U
D009	F009	K009	K061	K145	P009	P060	P112	U009	U055	U099	U145	U189	U244	131U
D010	F010	K010	K062	K147	P010	P062	P113	U010	U056	U101	U146	U190	U246	139U
D011	F011	K011	K069	K148	P011	P062	P114	U011	U057	U102	U147	U191	U247	150U
D012	F012	K013	K071	K149	P012	P063	P115	U012	U058	U103	U148	U192	U248	
D013	F019	K014	K073	K150	P013	P064	P116	U014	U059	U105	U149	U193	U249	
D014	F024	K015	K083	K151	P014	P065	P118	U015	U060	U106	U150	U194	U271	
D015	F025	K016	K084	K156	P015	P066	P119	U016	U061	U107	U151	U196	U277	
D016	F032	K017	K085	K157	P016	P067	P120	U017	U062	U108	U152	U197	U278	
D017	F034	K018	K086	K158	P017	P068	P121	U018	U063	U109	U153	U200	U279	
D018	F035	K019	K087	K159	P018	P069	P122	U019	U064	U110	U154	U201	U280	
D019	F037	K020	K088	K161	P020	P070	P123	U020	U066	U111	U155	U202	U328	
D020	F038	K021	K093	K169	P021	P071	P127	U021	U067	U112	U156	U203	U353	
D021	F039	K022	K094	K170	P022	P072	P128	U022	U068	U113	U157	U204	U359	
D022		K023	K095	K171	P023	P073	P185	U023	U069	U114	U158	U205	U364	
D023		K024	K096	K172	P024	P074	P188	U024	U070	U115	U159	U206	U367	
D024		K025	K097	K176	P026	P075	P189	U025	U071	U116	U160	U207	U372	
D025		K026	K098		P027	P076	P190	U026	U072	U117	U161	U208	U373	
D026		K027	K099		P028	P077	P191	U027	U073	U118	U162	U209	U387	
D027		K028	K100		P029	P078	P192	U028	U074	U119	U163	U210	U389	
D028		K029	K101		P030	P081	P194	U029	U075	U120	U164	U211	U394	
D029		K030	K102		P033	P082	P196	U030	U076	U121	U165	U213	U395	
D030		K031	K103		P034	P084	P197	U031	U077	U122	U166	U214	U404	
D031		K032	K104		P036	P085	P198	U032	U078	U123	U167	U215	U409	
D032		K033	K105		P037	P087	P199	U033	U079	U124	U168	U216	U410	
D033		K034	K106		P038	P088	P201	U034	U080	U125	U169	U217	U411	
D034		K035	K111		P039	P089	P202	U035	U081	U126	U170	U218		
D035		K036	K112		P040	P092	P203	U036	U082	U127	U171	U219		
D036		K037	K113		P041	P093	P204	U037	U083	U128	U172	U220		
D037		K038	K114		P042	P094	P205	U038	U084	U129	U173	U221		
D038		K039	K115		P043	P095		U039	U085	U130	U174	U222		
D039		K040	K116		P044	P097		U041	U086	U131	U176	U223		
D040		K041	K117		P045	P098		U042	U087	U132	U177	U225		
D041		K042	K118		P046	P099		U043	U088	U133	U178	U226		
D042		K043	K123		P047	P101		U044	U089	U134	U179	U227		
D043		K044	K124		P048	P102		U045	U090	U135	U180	U228		

Facility Site Diagram



4) Facility Security

i) The PCPG complex is secured by multiple means to prevent the unauthorized or unknowing entry of any person or animal onto the site in accordance with 40 CFR 264.14 and R299.9605.

ii) A six-foot high, cyclone and barbed wire security fence encloses the entire perimeter of the operational area of the plant. The perimeter fencing includes eight gates that remain secured when not in use.

iii) The security office is located adjacent to the main access gate. A security guard is stationed at the security office on a 24-hour basis as a means to control entry. The main access gate is motor operated and controlled from within the security office. All deliveries and visitors entering the complex must enter at this point. The security guard maintains a log of individuals entering the complex.

3) Identification of Potential Situations

The decision to implement the contingency plan will depend on whether the occurrence presents a potential hazard to human health or could release hazardous waste or hazardous waste constituents to the environment.

Table 1: Emergency Situations for Implementing the Contingency Plan

EMERGENCY	POSSIBLE EFFECTS
Fire and/or explosion	Fire cannot be contained with portable fire fighting equipment
	Toxic fumes are released
	Imminent danger exists of a fire/ explosion
Spillage	Spill cannot be contained with available equipment, i.e., spill exceeds the secondary containment capacities and/or the on-site capacity
	Spill could release toxic fumes or liquids which harm human health
Natural Disaster	A tornado has damaged the site High winds in excess of 70 mph hit the site
	An earthquake has occurred
Breach of security or sabotage	The facility's security has been breached and sabotage may result

B EMERGENCY COORDINATORS

The Emergency Coordinators for the PCPG complex are responsible for determining the nature of the emergency, implementing the contingency plan, coordinating all on-site activities with local, State, and Federal emergency management personnel and for all required notifications.

All employees are trained to notify their supervisor upon discovery of a fire, explosion, or spill. The supervisor will in turn notify an Emergency Coordinator for further directions regarding implementation of this Contingency Plan. Should the Emergency Coordinator be on call and require time to arrive on-site, a designee will be assigned to direct the preliminary emergency response procedures necessary to protect human health and the environment.

1) Identification of Primary and Alternate Emergency Coordinators

Should such an emergency result after normal working hours, an after hours phone listing is maintained by all management personnel and at the security office. This listing includes all home telephone numbers and mobile telephone numbers where appropriate.

Table 1 – Site Emergency Coordinators

	Name	Address	Work/ Cellular Phone	Home Phone
Primary Coordinator	**Allen Jones**	**902 Trombley Grosse Pte. Park, MI 48230**	**313.743.4461**	**313.220.4228**
Second Alternate Coordinator	**Melanie Frohriep**	**23725 Rosalind Eastpointe, MI 48021**	**313.743.4487**	**586.201.3212**
Third Alternate Coordinator	**Shamar Sanders**	**21801 McCormick Grosse Pte., MI 48236**	**313.743.4467**	**313.623.5453**

2) Qualifications of the Emergency Coordinators

Emergency Coordinators and Alternate Emergency Coordinators have been chosen based on their knowledge of the activities of the complex, experience, and background. Contingency Plan Table 1 lists, in priority, those individuals who have

been given the responsibility of Emergency Coordinator. These individuals have been trained to be thoroughly familiar with all aspects of the Contingency Plan, the various operations conducted at the complex, the locations and types of waste handled, the location of all emergency equipment, procedures for safe emergency response, the location of all records, and the complex's general layout. The Emergency Coordinator will be notified immediately, should an emergency occur.

3) Authority to Commit Resources

Each potential Emergency Coordinator/Alternate has been given full authority to commit whatever resources are necessary for implementing this plan.

C IMPLEMENTATION OF THE CONTINGENCY PLAN

A site emergency may be caused by a fire or explosion, accidental spillage of material, natural disasters, or breach of security. The following situations are provided as guidance to facility personnel as the conditions or circumstances under which the Plan must be implemented:

1) Fire and/or Explosion

i) Fire poses the greatest risk of any possible cause of a site emergency. PCPG has designed its complex in compliance with appropriate National Fire Protection Agency Codes and the National Electrical Code, including Class I Group D, Division 1 equipment, where applicable.

ii) Explosions may result from accidental ignition or vapors developed during operations at the complex.

iii) In the event of a fire or explosion, personnel have been instructed to do the following:

(1) Activate the emergency alarm system or back-up air signal horns.
(2) Notify the primary Emergency Coordinator immediately.
(3) Evacuate all site personnel in the vicinity of the accident. These persons are to report to the designated safety locations for accountability. These designated areas are shown in Evacuation Plan Figure 052
(4) For small, contained fires where risk of extension of fire is not present, procure fire extinguishers and attempt to control or extinguish the fire, without putting oneself in a health-threatening situation.

iv) If the fire/explosion is determined to be within the on-site emergency response capabilities, the Emergency Coordinator will contact and deploy properly trained in-plant personnel. Emergency equipment locations are shown on Figure 051 Emergency Equipment Locations, and list with a brief description of capabilities of the emergency equipment is provided in

Appendix 3 – Safety & Emergency Equipment. If the accident is beyond plant capabilities, the Emergency Coordinator will contact the appropriate agencies for assistance. A list of agencies and phone numbers can be found in Appendix 1 - Contingency Plan Reporting Contact Information.

v) Fire fighting will not be done at the risk of injury to the persons involved; however, early containment of the fires can significantly decrease potential harm or risk.

vi) Evacuation of plant personnel will be necessary if the fire cannot be contained or if there is a threat of an explosion. All personnel have been trained in evacuation procedures and means of exit from their respective work areas.

2) Spillage

i) Only a spill in excess of the secondary containment would pose any threat to the surrounding environment and once which the Plan must be implemented

ii) If the spilled material has the potential for ignition, the Emergency Coordinator will follow the procedures outlined under Fire and/or Explosion.

iii) If a hazardous waste spill is not contained or if a threat to human health or the environment off-site is present, the Plan will be implemented.

iv) If an employee discovers a major hazardous waste spill or process problem resulting in a vapor release, he or she will immediately report to the shift supervisor at the time of the incident, who will contact the appropriate Emergency Coordinator.

v) The Emergency Coordinator will assess the magnitude and potential seriousness of the spill or release. If the accident is beyond the facility's capabilities, the Emergency Coordinator will contact the appropriate emergency response contractors and agencies for assistance, as appropriate. A list of agencies and phone numbers can be found in Appendix 1 - Contingency Plan Reporting Contact Information.

vi) The initial priority of all emergency response activities is to protect human health and safety, and then the environment. Identification, containment, treatment, and disposal assessment will be the second priority. In the event of a spill or release, all efforts will be taken to contain the material on-site.

3) Natural Disasters

In the event of any emergency caused by severe weather (i.e., tornadoes, earthquake, heavy rain, or snowfall, etc.), the following types of actions may be

taken under the direction of the Emergency Coordinator, if and only if they can be accomplished without unduly endangering the safety of any personnel:

i) Visually inspect tanks to ascertain structural integrity.

ii) Close windows and doors.

iii) Move any containers on loading or unloading areas to the container storage area.

iv) Instruct employees to proceed to the designated Safety Locations.

4) Breach of Security

In the event of an emergency caused by a breach of security, the following actions will be taken under the direction of the Emergency Coordinator:

i) Alert the security office.

ii) Notify the Detroit Police Department as to the nature the breach and request support.

iii) Limit on-site operations to essential activities.

iv) Evacuate the site if the risk of sabotage exists.

v) Advise transporters of the situation and limit access to the site until any threat of sabotage has been eliminated.

D EMERGENCY PROCEDURES

The following general procedures will be implemented by the Emergency Coordinator, or a designee, once the contingency plan is implemented to efficiently respond to the release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

1) Immediate Notification Procedures

i) Generally, the procedure upon the discovery of a fire, release, or other incident is the following:
   (1) Employees should notify their supervisor for further instruction.
   (2) The supervisor will contact the Emergency Coordinator to determine the steps necessary to protect human health and the environment.
   (3) The Emergency Coordinator or designee will notify security of the nature and extent of an emergency incident and direct security to activate the facility alarm or the public address system.

(4) If the emergency warrants IMMEDIATE evacuation, all employees have been trained to activate the site-wide facility alarm or the back-up Air Signal Horns located at:
(a) Nortru, LLC. Transfer Facility (550 Lycaste Street)
(b) SBS Building
(c) Motor Control Center
(d) Dock I
(e) 501 Lycaste Building
(f) If the facility alarm is activated, all employees are directed to evacuate the facility according to the designated evacuation routes.

ii) If the emergency warrants assistance from an outside State or local agency, additional emergency response resources shall be immediately summoned from the agencies listed on Appendix 1 - Contingency Plan Reporting Contact information

iii) Each employee has access to the alarm stations and telephone communication systems located throughout the facility (see Figure No. 051 - Emergency Equipment Locations).

2) Identification of Releases

i) In the event of an emergency, the Emergency Coordinator will immediately identify the following regarding any released material:

(1) Characteristics,
(2) Exact source,
(3) Amount, and
(4) Extent of migration

This may be achieved through observation and/or review of manifests, facility records, generator profiles, chemical labels, placards, material safety data sheets, or if necessary, by chemical analysis.

ii) The designated Emergency Coordinator will obtain, at a minimum, the following information:

(1) The material spilled or released.
(2) Location of the release or spill.
(3) An estimate of quantity released and the rate at which it is being released.
(4) The direction in which the spill, or release, is heading.
(5) Any injuries involved.
(6) Fire and/or explosion or possibility of these events.
(7) The area and materials involved and the intensity of any fire or explosion.

3) Hazard Assessment

i) According to the information obtained from the identification of the hazardous materials and information supplied by the area supervisors, the Emergency Coordinator will assess possible hazards to human health and the environment. The assessment will consider both direct and indirect effects of the release, fire, explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water runoffs from water or chemical agents used to control fire and heat-induced explosions).

ii) The assessment, at a minimum, will include the following:

(a) Determination of hazardous properties of the involved material by review of available analytical data, waste profile and Material Safety Data Sheets (MSDS), as appropriate.
(b) Determination of the environmental conditions contributing to the seriousness of the situation (i.e., wind speed and direction, ground moisture, relative humidity, temperature, etc.).
(c) Determination of the population at risk (both on-site and off-site).
(d) Determination of the readiness and suitability of the available response equipment.

iii) If the assessment indicates that an evacuation of local areas is advisable, the appropriate local authorities must be notified immediately. The Emergency Coordinator must be available to help officials decide if local areas should be evacuated.

iv) The Facility's Evacuation Plan is included in the Contingency Plan (Appendix 4 – Evacuation Plan)

4) Notify all Appropriate Emergency Response Authorities

i) 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 findings must be reported as directed on the Contingency Plan Incident Report form found in Appendix 2.

ii) If the Emergency Coordinator determines one of the following:
(1) A fire, explosion, or other release of hazardous waste or hazardous waste constituents has occurred that could threaten human health or the environment, or
(2) A spill has reached surface water or groundwater,

the Emergency Coordinator shall immediately notify the Michigan Pollution Emergency Alerting System (PEAS) as directed on the Contingency Plan Incident Report form found in Appendix 2.

5) Control Procedures to Prevent Occurrence, Reoccurrence or Migration during the Emergency

i) During an emergency, the coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, reoccur, or spread to other areas of the complex. These measures will include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers, tank contents, engaging the sewer shutoff mechanism, etc.

ii) Actions to prevent the recurrence or spread of fires, explosions, or releases include:
(1) Determining the source or cause of the incident,
(2) Ceasing operations,
(3) Turning off all auxiliary fuel lines and power supplies to the affected equipment or areas,
(4) Cleaning up all of the debris from the incident,
(5) Maintaining good housekeeping,
(6) Containing and collecting all released waste,
(7) Recovering and isolating affected containers,
(8) Ensuring fire is completely extinguished, and
(9) Restoring all emergency equipment to operating condition.

iii) Further measures to prevent the recurrence or spread of fires, explosions or releases include prohibiting smoking in all operational areas, using spark-proof tools, isolating the waste by removing all sources of ignition or reaction, and by protecting the area from open flames, cutting and welding activities, hot surfaces, frictional heat, static discharge, etc. If fire or explosion is determined to be an ongoing hazard, standby fire-fighting equipment will be maintained in a ready state until the emergency is over.

iv) Specific control plans for each type of emergency have been developed:

(1) Fire and/or Explosion

(a) Fire poses the greatest risk of any possible cause of a site emergency. PCPG has designed its complex in compliance with appropriate National Fire Protection Agency Codes and the National Electrical Code, including Class I Group D, Division 1 equipment, where applicable. Equipment such as pressure/vacuum release valves, flame arrestors, tank and container grounding and bonding systems, valves, pipelines, and explosion-proof controls, light fixtures, fire valves,

pumps and motors, are installed to reduce the potential risk of a fire. Smoking is strictly prohibited in operational areas of the property fence line. Portable fire extinguishers are located throughout the complex and office areas; and at least five (5) city fire hydrants are located in close proximity to the complex. The locations of fire extinguishers and alarms are itemized in Appendix 3 – Safety and Emergency Equipment. Additionally, all site personnel are instructed on fire safety as a part of the training procedures.

(b) Explosions may result from accidental ignition or vapors developed during operations at the complex.

(c) Only intrinsically safe mobile phones may be used in the operating areas of PCPG to reduce any spark potential.

(2) Spillage

(a) The environmental consequences of an accidental spill have been substantially reduced by providing secondary containment for tanks, pipes, and container storage areas in accordance with Federal and State regulations. Concrete containment is provided for all tanks and container storage areas, and an aboveground steel trough provides containment for yard piping. Thus, only a spill in excess of the secondary containment would pose any threat to the surrounding environment.

(b) A sewer safety valve is installed as a part of the storm water run-off control that provides further secondary containment capabilities at the facility. The sewer safety valve is designed to contain on-site spillage from transportation vehicles or that exceeds the containment capabilities and prevents any release from entering the Detroit Water and Sewer Department sewer system. In the event of an accidental spill, fire poses a secondary threat; therefore employees are not permitted to smoke in any operational areas. Other possible sources of ignition have been eliminated to the extent practical. If the spilled material has the potential for ignition, the Emergency Coordinator will follow the procedures outlined under Fire and/or Explosion.

6) A description of the locations, brief description of the capabilities and limitations of the emergency equipment available at the complex are listed in Appendix 3 – Safety & Emergency Equipment. Figure No. 051 – Emergency Equipment Locations shows the locations of the equipment. Emergency equipment includes:

(1) Internal communication systems,
(2) Fire alarms,
(3) Spill control material, and

(4) Decontamination equipment.

7) Equipment Monitoring

The Emergency Coordinator will monitor for leaks, pressure buildup, gas generation, ruptured valves, pipes, or other equipment whenever the facility stops operations in response to an emergency event. Visual inspections will be performed at regular intervals to identify leaks, gas evolution. The controls in the Motor Control Room will be observed for warning lights indicating malfunction or high levels in the tank systems. The pressure readings of the boiler systems will be monitored for leaks and/or pressure build-up. Air samples will be collected at appropriate areas utilizing existing air sampling equipment

8) Management of Released Materials

In the event of a site emergency, it will ultimately be the Emergency Coordinator's responsibility to:

i) 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. The material will be handled in accordance with applicable hazardous waste generator regulations, if required.
ii) Ensure that in the affected area of the facility, no waste that is incompatible with the released material is treated, stored, or disposed of until clean up procedures are completed.
iii) Ensure that any equipment used in the response activities are properly cleaned or decontaminated, repaired, replaced, and returned to the proper location

9) Procedures for Cleanup and Decontamination

Immediately after an emergency, the Emergency Coordinator will have representative samples of all recovered wastes, contaminated soils, and waters characterized. Should the appropriate management method of any contaminated material be outside the scope of the facility's permits or capabilities, arrangements for any necessary off-site management will be completed as soon as possible after the conclusion of the emergency. Accumulated materials will be containerized to the extent possible for on-site treatment or off-site shipment. If large quantities of a hazardous waste which require off-site recycling/treatment are generated during the emergency cleanup operations, bulk vehicles complying with the transportation requirements of 40 CFR Part 171, et. seq., will be used to transport this waste off-site as it is excavated, pumped or made ready for off-site storage, treatment or disposal.

i) Specific Procedures for Tank or Container Spills and/or Leakage

In the event of a spill, personnel have been instructed to do the following:

(1) Containers

(a) Spills

The following represent general procedures that may be followed in the event of a container spill.

(i) For a major spill contact an Emergency Coordinator.
(ii) Ascertain the extent of the spill and what the material is that spilled.
(iii) Isolate the area of the spill.
(iv) Remove all of the sources of ignition and any incompatible materials from the affected area.
(v) Initiate clean up of spill.
(vi) Recharge, decontaminate, replace and/or make fit for use any emergency equipment used.
(vii) Document spill response activities

b) Leakage

Should a container be found to be leaking either through the inspection requirements of 40 CFR 264.174 or other visual inspection, every attempt will be made to facilitate the expeditious removal of leaked material and repair, replace or repackage the affected container.

(2) Tanks

If a spill or leak occurs due to the failure of a tank, the requirements contained in 40 CFR 264.196 will be met to include:

(a) Cessation of use and prevention of additions of wastes (40 CFR 264.196(a)). Immediately stop the flow of material into the tank and inspect the tank for the cause of the release.

(b) Removal of wastes (40 CFR 264.196(b)). Within 24 hours or at the earliest practical time, remove as much of the material as is needed to prevent further release to the environment and inspect and repair the tank.

(c) Containment of any visible release to the environment (40 CFR 264.196(c)). Secondary containment in excess of 150% of the containment area's largest tank is provided for all regulated tank farms in the complex. This makes release outside of containment extremely unlikely. If secondary containment were breached, use adsorbent

booms and materials to contain the released materials. At least one vacuum truck is available at all times, which could also be utilized to collect released materials. All adsorbent materials, contaminated soils and collected wastes will be processed on-site or managed off-site in accordance with applicable Federal, State, and local requirements.

(d) Notification as required (40 CFR 264.196(d)). All releases to the environment, unless under one (1) pound and immediately contained and cleaned up, will be reported to the Regional Administrator within 24 hours of its detection, and a written report will be sent within 15 days.

(e) Repair or closure (40 CFR 264.196(e)). The tank will be closed unless: (1) the cause of the release was a spill that did not damage the integrity of the containment system or the tank, the tank will return to service as soon as any necessary repairs are made, or (2) if the cause of the release was from the tank, the tank will be repaired prior to being returned to service.

(f) Certifications (40 CFR 264.197(f)). If the repair is extensive, the tank will not be returned to service until certification from an independent registered professional engineer is obtained. This certification will be submitted to the Regional Administrator within 7 days of returning the tank to service. A certification will also be sent to the MDEQ Chief of the Waste Management Division.

E NOTIFICATION AND RECORDKEEPING REQUIREMENTS

1) Agency Notification Prior to Commencement of Operations

i) Should any of the emergency equipment be utilized during an emergency, affected operations will not be allowed to resume until a post-incident inspection has been completed and all equipment is cleaned, recharged, replaced and/or made fit for use.

ii) The Emergency Coordinator will notify EPA, MDEQ and local agencies (see Table 3 – Contingency Plan Reporting Contact Information) that a post-incident emergency equipment maintenance check has been performed and all emergency equipment has been returned to pre-incident status and normal operations will resume.

2) Recordkeeping Requirements

i) Operating Record
In the event of an emergency situation that requires implementation of the contingency plan, the Emergency Coordinator will document in the facility's

operating record, the time, date and description of the event. The operating record is maintained by the Facility Supervisor and can be found in the Supervisor's Office at the Shipping/Receiving Office @ 501 Lycaste Street. Previous Day's records can be found in the EH&S office @ 515 Lycaste

ii) Written Incident Report
Within 15 days of the incident, a report must be filed with the Regional Administrator and Michigan Department of Natural Resources and Environment (MDEQ). The information required is contained in Appendix 2 - Contingency Plan Incident Report.

F CONTINGENCY PLAN REVIEW AND AMENDMENTS

The contingency plan will be reviewed and immediately amended per 40 CFR 265.54, if necessary, whenever:

1) Applicable regulations are revised or promulgated.

2) The plan fails in an emergency.

3) The facility changes in design, construction, operation, maintenance, or other 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.

4) The list of Emergency Coordinators changes.

5) The list of emergency equipment changes substantially.

Appendix 1 - Contingency Plan Reporting Contact Information

1) If an outside contractor is necessary to assist in containing the hazardous material release call either of the following:

   a) Inland Waters Pollution Control, Inc.
   2021 South Schaefer Highway
   Detroit, MI 48217
   800-992-9118

   b) PSC Industrial Outsourcing, LP
   1300 Wood Street
   Monroe, MI 48161
   734.384.9200

2) If a fire or explosion has occurred call: City of Detroit Fire Department: 911

3) If an evacuation of the area is ordered or security has been breached call:

   City of Detroit Police Department: 911

   Wayne County Sheriff: 601.735.2323

   State Police - Radio Room: 313.456.6600

4) If personnel exposure or injury has occurred call:

   Ambulance: 911

   Detroit Receiving Hospital: 313.745.3000

   Concentra Medical Service: 313.259.7990

5) If there has been an emergency or release call:

   i) Michigan Department of Environmental Quality (PEAS)

      Outside Michigan: 517.373.7660

      Inside Michigan: 800.292.4706

   ii) EPA National Response Center: 800.424.8802

   iii) Industrial Waste Control (DWSD): 313.267.7401

iv) City of Detroit Health Department: 313.876.4000

v) MIOSHA: 517.487.4996

Appendix 2 - Contingency Plan Incident Report

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, IMMEDIATELY notify the National Response Center at 800.424.8802.

If the emergency coordinator determines that the facility has had a fire, explosion or other release of hazardous waste or hazardous waste constituents that could threaten human health or the environment, or if it is known that a spill has reached surface water or groundwater, then the Emergency Coordinator shall immediately notify the Michigan Pollution Emergency Alerting System (PEAS: 800.292.4706).

The following information must be provided:

1. Name: _____
2. Telephone: _____
3. Facility Name: _____
4. Facility Address: _____
5. EPA ID No.: _____
6. Date: _____ 7. Time: _____
8. Type of Incident (i.e., fire, release): _____
9. Name Material(s) involved: _____

   _____

   _____

10. Quantity: _____
11. Extent of injuries, if any: _____

    _____

12. Quantity and disposition of recovered materials: _____

    _____

13. Actual/potential hazards to human health or the environment: _____

_____

14. Immediate response action taken: _____

_____

_____

_____

If the emergency coordinator determines that this contingency plan has been implemented, a written incident report must be submitted to the Regional Administrator, and appropriate State and local authorities within 15 days. The report must include the following information.

1. Owner Name: _____
2. Owner Address: _____
3. Owner Telephone: _____
4. Facility Name: _____
5. Facility address: _____
6. Facility Phone: _____
7. Incident Date: _____ 7. Incident Time: _____
8. Type of incident (i.e., fire, release): _____

_____

9. Name Material(s) Involved: _____

_____

_____

10. Quantity: _____

11. Extent of Injuries, if any: _____

_____

_____

12. Actual/potential hazards to human health or the environment: _____

_____

_____

_____

15. Quantity and disposition of recovered materials: _____

_____

_____

_____

_____

Appendix 3 – Safety & Emergency Equipment

Equipment	Location
MAINTENANCE GARAGE	
Fire Extinguisher	W. wall of the maintenance garage
	E. wall of the maintenance garage
	N.E. of maintenance garage door
	S. at back door of maintenance
	N.W. wall
First Aid	S. at back door of maintenance
LAB SAMPLE ROOM	
Fire Extinguisher	N.W. corner by door
MAIN ENTRANCE	
Fire Extinguisher	On pole W. of security office
	S. wall of security office
Spill Kit	Next to pole, W. of security office
Telephone	Inside security office
Stationary Radio	Inside security office
First Aid	Inside security office
CONTAINER MANAGEMENT BUILDING (CMB)	
Main Floor	
Portable Extinguisher	S.E. wall by pump room doors
	W. entrance
Fire Extinguisher	S wall of pump room
	Center of pump room
Alarm Pull Station	Pump Room-S.E. side by door
Alarm Pull Station	S. wall by exit near stairs to 2nd floor
Alarm Pull Station	N.W. wall by door
Alarm Pull Station	Control Room-E. wall
Eye Wash & Safety Shower	CMB dock
	W. wall CMB
	Center of pump room
	E. wall of pump room
	E. wall CMB by pump room doors
Spill Kit	E. wall CMB by pump room doors
2nd Floor	
Alarm Pull Station	E. wall near door

DOCK 1 and 4	
Fire Extinguisher	S. wall Dock 1
	N.W. corner of Dock 4 truckwell
	N. wall between Dock 1 & 4 near reactive cabinet
	E . Wall of Dock 1 near reactive cabinet
	N. wall Dock 1
Eye Wash & Safety Shower	W. wall by Dock 4
Portable Extinguisher	N. Walll btwn Dock 1 &4
	W. wall of Dock 1
Alarm Pull Station	E. wall by Dock 4
DOCK 2	
Fire Extinguisher	N.E. on pole
	N.W. on pole
DOCK 3	
Fire Extinguisher	N. wall of Dock 3
Portable Extinguisher	S.W. corner of Dock 3
TANKSYSTEM 3 (TS3)	
Fire Extinguisher	N. wall of pre-reclamation tank farm
	S.W. Corner
	E. Wall
Alarm Pull Station	N. side on pole
PROPANE STORAGE AREA	
Fire Extinguisher	S.W. side on pole
SDG PRODUCT TANK FARM	
Fire Extinguisher	N. of SDG tank farm
	S.E. of SDG tank farm
	S.W. of SDG tank farm
Alarm Pull Station	N. of SDG tank farm
	S. of SDG tank farm
Spill Kit	E. of SDG tank farm
Portable Extinguisher	E. of SDG tank farm
	N.W. corner of SDG tank farm

TANK SYSTEM 1 (TS1)	
Fire Extinguisher	N. beam on back pad
	Middle beam on back pad
	Middle beam of back pad
	S. beam on back pad
	S.E. Wall
Spill Kit	S.W. corner of truck containment
Alarm Pull Station	S.E. wall outside of header
MOTOR CONTROL CENTER (GREEN HOUSE)	
Fire Extinguisher	S. wall inside of building
Fire Blanket	S. wall inside of building
Stretcher	S. wall inside of building
Eye Wash & Safety Shower	W. wall inside of building
TANK SYSTEM 2 (TS2)	
Fire Extinguisher	Middle pole putside header area
	Inside header area on S.E. corner
	N.E. on pole inside containment
	E on middle beam of truck containment
Portable Fire Extinguisher	N.E. corner outside of containment area
Alarm Pull Station	N.E. corner outside of containment area
SUPER BLENDER SYSTEM	
Spill Kit	N.E. corner of building (outside)
COMPACTOR AREA INSIDE SUPER BLENDER SYSTEM	
Fire Extinguisher	N.E. corner
	S. wall
	N. wall
	S.W. corner
Spill Kit	S.W. corner
Portable Eye Wash	W. wall

TRUCK UNLOAD DOCK INSIDE SUPER BLENDER SYSTEM	
Fire Extinguisher	W. wall of SBS unload dock
	S. wall
	N. wall
	S.W. corner
Portable Fire Extinguisher	E. wall of SBS unload dock
Alarm Pull Station	E. wall of SBS unload dock
SUPER BLENDER SYSTEM CRANE AREA	
Fire Extinguisher	E. wall by door
Spill Kit	S.E. corner of building
PCPG LAB	
Fire Extinguisher	S. wall of sample closet
	W. wall of the PCPG lab clean room
	N.E. wall of the PCPG lab
	S.W. wall of the PCPG lab
	Break room- S. wall across from time clock
Fire Blanket	S. wall near sample closet
First Aid	E. wall near sample closet
Stretcher	E. wall near sample closet
Eye Wash & Safety Shower	N. wall of the PCPG lab
Eye Wash	W. wall of PCPG lab
Telephone	W. wall of PCPG lab
Stationary Radio	W. wall of PCPG lab
501 BUILDING	
Fire Extinguisher	S.W. wall by plant exit
	W. wall of main area
Telephone	N. wall of office
	N. wall of office
	S. wall of office
	S.W. wall of office
Stationary Radio	N. wall of office
	N. wall of office
	S. wall of office
	S.W. wall of office

LOCKER ROOM	
Fire Extinguisher	N. wall of the lunch room
	N. wall of the dirty side of the locker room
	E. wall of the clean side of the locker room
BOILER ROOM	
Fire Extinguisher	S. wall of the north side of the boiler room
	S. wall of the middle of the boiler room
	N. wall of the south side of the boiler room
EMERGENCY SUPPLY ROOM	
Foam Dolly Extinguisher	Inside of emergency supply room
Stretcher	Inside of emergency supply room
FireBlanket	Inside of emergency supply room
Oxygen	Inside of emergency supply room
First Aid	Inside of emergency supply room
Air Purifying Respirators	Issued upon hire/as needed; inside emergency supply room
Tyvek suits	Issued as needed; inside emergency supply room
Safety glasses	Issued upon hire/as needed; inside emergency supply room
Hard Hats	Issued upon hire/as needed; inside emergency supply room
Safety boots	Issued upon hire/as needed; inside emergency supply room
Rubber aprons	Issued upon hire/as needed; inside emergency supply room
Chemical goggles	Issued as needed; inside emergency supply room
ADDITIONAL EQUIPMENT	
Portable Fire Extinguisher	Staged in maintenance building
515 OFFICE BUILDING	
Fire Extinguisher	S.W. Wall 2nd Floor
	N. Wall by Vault 2nd floor
	N.W. Wall 1st Floor
	Pole in Customer Service 1st Floor
	E. Wall in Trans by main entrance 1st floor
	E. Wall by file room 1st floor

SAFETY AND EMERGENCY EQUIPMENT CAPABILITIES

Equipment	Capabilities
Fire Extinguishers (20 lbs, ABC)	hand held; capable of handling a three foot diameter fire
Portable Fire Extinguisher (100 lbs, CO2, Purple K; 150 lbs ABC)	easily moved on cart; capable of handling a seven foot diameter fire
Wheeled Foam Extinguisher (35 gallons, foam)	easily moved on cart; capable of handling a seven foot diameter fire
Fire Suppression System	manual/automatic start; remote fire fighting
Alarm Pull Station	capable of verbal instruction; notification of emergency and/or to initiate facility evacuation
Absorbent Materials (absorbent, sand, booms, etc.)	easily deployed, capable of containing and/or absorbing spilled liquid; generally limited to spills under 100 gallons
Eye Wash	able to flush material from eyes and face
Shower	able to flush material from body and clothing
First Aid Station	capable of responding to minor injuries
Fire Blanket	able to control and/or extinguish fires and/or protect employees
Stretchers	able to move injured employees
Air Purifying Respirator	minimize employee exposure to air contaminants
Safety Glasses and Goggles	employee eye protection
Hard Hats	employee head protection
Safety Boots	employee foot protection
Tyvek Uniforms	employee protection
Rubber aprons	employee protection

Appendix 4 – Evacuation Plan

A PURPOSE

This plan is designed to provide for the safe and organized evacuation of on-site personnel and visitors during a site emergency.

B IMPLEMENTATION

In the event of a fire or explosion, IMMEDIATE implementation of this Evacuation Plan may be initiated by activating a facility alarm system. Otherwise, this Evacuation Plan will be implemented at the discretion of the Emergency Coordinator. Once implemented, all employees are responsible for following these procedures and reporting to designated safety locations as directed. The Emergency Coordinator and supervisory personnel will account for all persons prior to any individual leaving the Evacuation Area.

C SAFETY LOCATIONS

A primary and secondary Evacuation Area has been designated on the Evacuation Plan. The west side of Lycaste Street in front of 663 Lycaste Building is the primary Evacuation Area (exit facility main gate and turn left). In the event prevailing winds and toxic fumes would affect this location, all personnel will be directed to Evacuation Area in front of the Transportation Maintenance Garage located at 11700 Freud Street.

D INSTRUCTIONS

1) Once the emergency alarm is sounded and an evacuation of the site is ordered by the Emergency Coordinator, all on-site personnel will shut down operations and proceed immediately to the safety location specified. A copy of the Contingency Plan is located in the 421 Complex. Personnel are instructed to gather it and proceed to the safety location.

2) Until evacuation is signaled, personnel who are not in an affected area will stay in their respective work areas. Visitors will be cleared from the area and instructed to report to the main office area, and thereafter released.

3) Unless otherwise directed by announcement on the Public Address System, evacuation will be via the most direct route, either the main access gate or any emergency gate. The security officer will open the main gate immediately, and any other emergency gates, to facilitate the most direct evacuation.

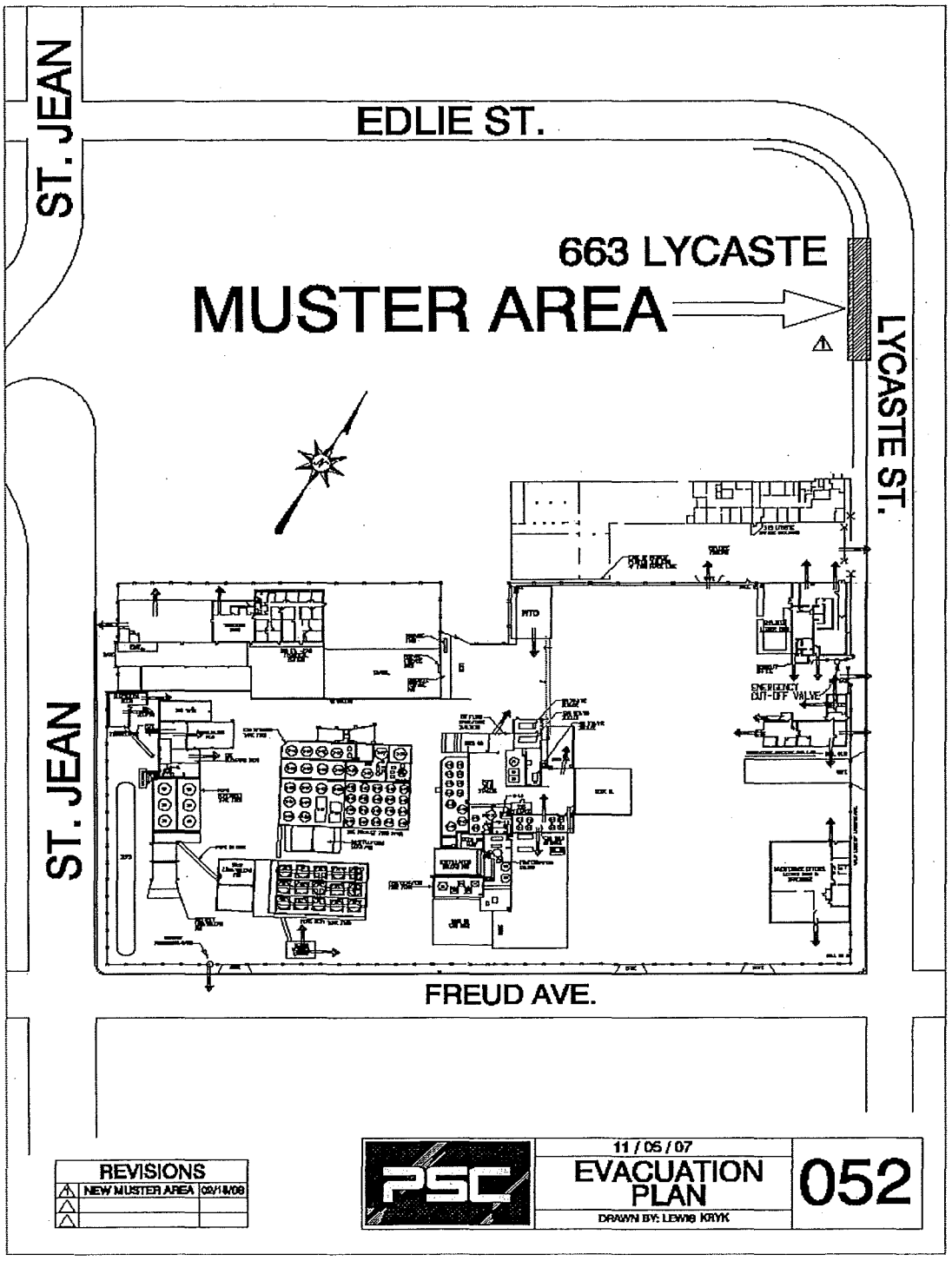
4) All on-site personnel will be accounted for at the safety location to ensure that all personnel have been safely evacuated and that no individual(s) remain within the complex. Individuals are to report to the designee equipped with a safety vest

and employee list for attendance. The Emergency Coordinator may request individuals to return to the complex to support emergency activities if such activities do not pose a risk of harm to the individual, or continue work once conditions permit.

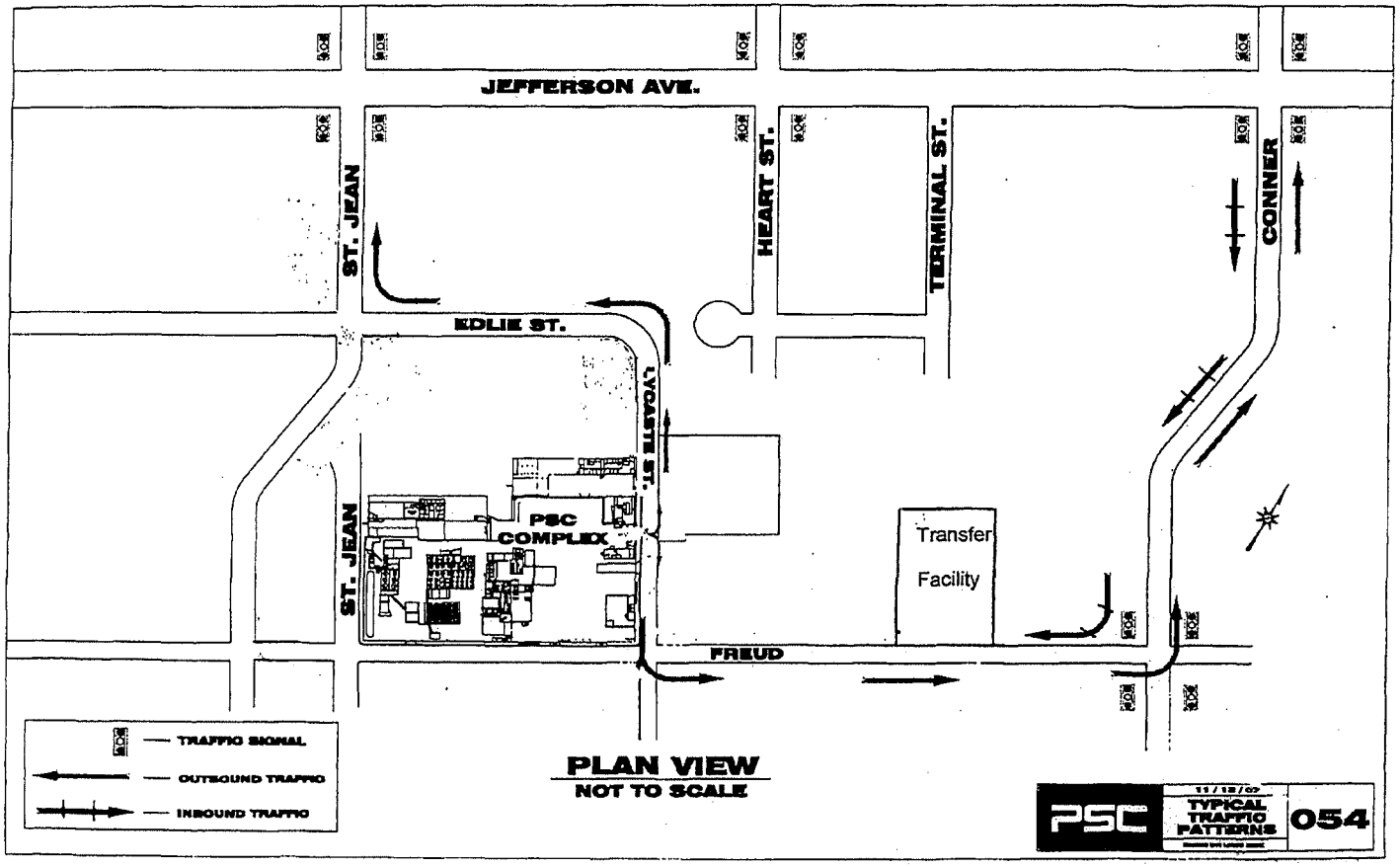
5) If necessary, the Emergency Coordinator may establish an emergency coordination center. The primary emergency coordination center will be the conference room located at the main office building. If this location is not safe, the Training Room located at 11700 Freud will be used.

6) An "all clear" signal will be given when the emergency has been controlled and the safety of personnel is assured. The Emergency Coordinator will determine when the emergency has passed and consult any on-site officials if necessary before the "all clear" signal is given. All emergency equipment used in the emergency will be cleaned for use prior to resuming plant operation in affected areas.

421 EVACUATION PLAN AND TRAFFIC FLOW PLAN



EMERGENCY EVACUATION TRAFFIC PATTERN FLOW



All inbound traffic arrives at Transfer Facility via Freud St. entrance

APPENDIX 5 - FIRE SAFETY PLAN

Petro-Chem Processing Group of Nortru, LLC.

515 Lycaste Street, Detroit, Michigan 48214
313.824.5840

SECTION I – FACILITY

This is a two story masonry and steel frame construction building with three exits from the second floor and four exits from the first floor. The second floor is occupied as offices and two conference rooms. The first floor is occupied as lobby, offices and customer services. Standpipe systems are not located in each floor stairwell. Smoke detectors are located throughout each floor in offices and corridors. The building has an emergency fire alarm system. Fire extinguishers are in the building as indicated on the attached floor plan. The building does not have overhead sprinklers. Flammable liquids are not stored in the building. The electrical room is located on the first floor in the north-west corner of the building. The building is heated by a natural gas fired forced air furnace located on the first floor in the south west corner of the building and on the roof top. The gas shut-off is located on the exterior south west corner of the building.

IN THE EVENT OF FIRE, the emergency coordinator(s) or alternate without delay shall place a call to the fire department by calling **911**. The coordinator(s) upon receipt of fire alarm shall take charge of assisting other employees and visitors in evacuating their floor via the closest unobstructed stairway and exit building and proceed to the west side of Lycaste Street in front of 663 Lycaste Building is the primary Evacuation Area (exit employee gate and turn left). In the event prevailing winds and toxic fumes would affect this location, all personnel will be directed to Evacuation Area in front of the Transportation Maintenance Garage located at 11700 Freud Street.

SECTION II – WHEN YOU DISCOVER A FIRE

1. The first person to discover a fire shall immediately sound the building alarm (pull the fire alarm pull station in the immediate vicinity). **NEVER VERBALLY YELL FIRE;** It may cause panic. Use the telephone system to announce the evacuation of the building

2. If possible, assist all persons (employees, injured and handicapped) in the immediate vicinity of fire.

3. Isolate the fire, is possible. Close the door to the fire scene after all persons have been evacuated from the vicinity. (Do not attempt to extinguish a fire, unless the fire is small and you have received the proper fire extinguisher training and the proper fire extinguisher is available and **ONLY AFTER THE FIRE**

DEPARTMENT HAS BEEN CALLED. As a rule of thumb, if you cannot extinguish the fire after using two fire extinguishers, confine it, and then evacuate using nearest stairway.

4. Evacuate - DOWN TO LOBBY. Use closest unobstructed exit.

5. Notify receptionist/security/emergency coordinator(s) as to the fire location and severity, and then proceed to exit the building. Receptionists should gather sign-in book and exit the building. **Call 911 immediately.**

6. Exit the building and proceed to the west side of Lycaste Street in front of 663 Lycaste Building is the primary Evacuation Area (exit employee gate and turn left). In the event prevailing winds and toxic fumes would affect this location, all personnel will be directed to Evacuation Area in front of the Transportation Maintenance Garage located at 11700 Freud Street.

7. Remember, once you leave the building, do not re-enter for ANY REASON, until you have received an all clear. Emergency coordinator(s) shall take a head count and report all missing persons to firefighters in charge at the scene.

SECTION III – WHEN YOU HEAR THE FIRE ALARM

The building fire alarm system will sound throughout via the pull station or automated system. The building fire alarm system will sound throughout by other staff members in the vicinity by the use of the established code word for fire, **'CODE RED'** by indicating over the telephone system

1. Listen and follow the instructions of the person in charge (emergency coordinator) or directions broadcasted over the public address system or loudspeaker.

2. Assist the emergency coordinator(s) in evacuating the handicapped, visitors, employees, etc.

3. Close the door(s) behind you.

4. Do not use elevator.

5. Leave the building using the closest exit that is not obstructed by fire (See attached floor plan).

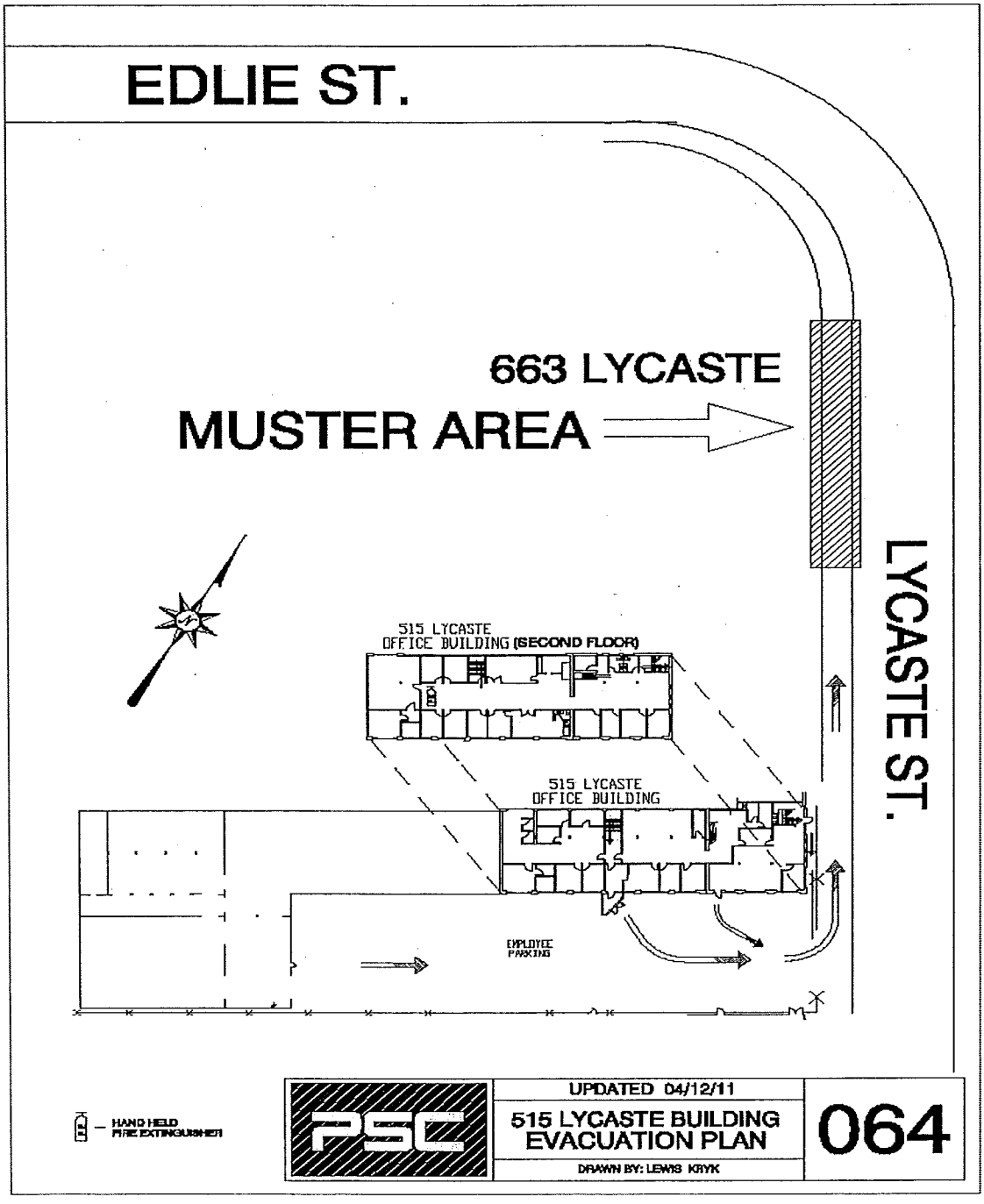
6. Exit the building and proceed to the west side of Lycaste Street in front of 663 Lycaste Building is the primary Evacuation Area (exit employee gate and turn left). In the event prevailing winds and toxic fumes would affect this location, all

personnel will be directed to Evacuation Area in front of the Transportation Maintenance Garage located at 11700 Freud Street.

7. Remember, once you leave the building, do not re-enter for **ANY REASON,** until you have received an all clear. Emergency coordinator(s) shall take a head count and report all missing persons to firefighters in charge at the scene.

It is impossible to anticipate every fire situation; however, the above fire safety procedures have been thought cover most fire situations. For further information call 313.596.2968

SECTION IV – 515 BUILDING FLOOR PLAN



APPENDIX 6 – CONTINGENCY PLAN SOP AND CHECKLIST

PSC Environmental Services
STANDARD OPERATING PROCEDURES

TITLE:	Contingency Plan Implementation		
Level:	PSC Detroit	Document Control:	PSC-DET-19
Function:	Environmental Compliance	Revision Number:	0
Department:	Operations	Issue Date:	September 22, 2011
		Revision Date:	

Plant Manager — Date 10/6/11

EH&S Specialist — Date 10/6/11

1.0 Purpose:

The purpose of this SOP is to outline the steps to be taken to determine if a release has occurred and the steps required to address off-site issues if a release has occurred.

2.0 Description:

This SOP applies to key personnel responsible for gathering information, determining the need to and implementing the Contingency Plan.

3.0 General:

3.1 This SOP applies to key personnel who respond to emergency situation at the facility.

3.2 All applicable employees will be trained in the requirements of this SOP.

3.3 The provisions of this SOP will be strictly adhered to.

3.4 The EHS Department will be responsible for training of key personnel.

4.0 Required Safety Equipment:

Hard hat, safety glasses, steel-toed boots and chemical resistant gloves. Additional PPE and supplies may be needed depending on the nature of the incident.

5.0 Procedure for Implementation :

5.1 The decision to implement the Contingency Plan will depend on whether the occurrence presents a potential hazard to human health or the environment.

5.2 Determine whether any of the following type of emergency situations exist:

EMERGENCY	POSSIBLE EFFECTS
Fire and/or explosion	Fire cannot be contained with portable fire fighting equipment
	Toxic fumes are released
	Imminent danger exists of a fire/ explosion
Spillage	Spill cannot be contained with available equipment, i.e., spill exceeds the secondary containment capacities and/or the on-site capacity
	Spill could release toxic fumes or liquids which harm human health
Natural Disaster	A tornado has damaged the site High winds in excess of 70 mph hit the site
	An earthquake has occurred
Breach of security or sabotage	The facility's security has been breached and sabotage may result

5.3 If any of the above situations exist, alert immediate supervisors who will in turn alert the emergency coordinators listed in the contingency plan.

5.4 The emergency coordinators will make the appropriate notifications and commit the resources necessary.

5.5 Emergency coordinators will also assist in completing the attached checklist for tracking facility response actions.

6.0 Duties and Responsibilities:

6.1 The EHS representative and any additional designee will be responsible for supervising the activities of this SOP.

1. Record Incident Parameters

PCPG Representative- As soon as access is available to employees/witnesses

Status	Date Completed	Action
		(a.) Document the time the incident began and the duration of the overall event. Identify the specific location(s) where the incident began
		(b.) Identify employees/witnesses having direct involvement or direct knowledge of the incident.
		(c.) Identify any relevant witnesses to the event.
		(d.) Gather local meteorological data from the National Weather Service (point-specific data are available at the National Oceanic and Atmospheric Administration [NOAA] Web site) and any characteristics noted by personnel directly involved with the incident or recorded elsewhere.

Comments:

2. Develop Event Narrative

PCPG Representative- As soon as access is available to employees/witnesses

Status	Date Completed	Action
		(a.) Determine the sequence of events and time line leading up to and throughout the incident by reviewing with employees directly involved, other on-site peripheral witnesses (office staff, truck drivers, maintenance staff, etc.), and access to other tools and resources, as available (automated data records, surveillance cameras, etc.).
		(b.) Identify specific event locations, materials, and equipment involved in the incident.
		(c.) Identify and characterize, to the extent possible, the size and scope of the event.

Comments:

3. Develop a Comprehensive List of Materials or Substances Involved

PCPG Representative- In combination with regulatory and health agencies and hazardous materials (hazmat) response teams-As soon as possible

Status	Date Completed	Action
		(a.) Identify all of the materials/substances that may have been involved in the event, using the information obtained in the previous steps, inventory records and/or container/tank logs, laboratory data, approval records, material safety data sheets, or any other means available. Use a generic list initially, and then develop a final list from off-site records. Verify that the most up-to-date records are used.
		(b.) Determine the volume, concentration, and weight of substances identified above, and determine how they may have been altered by the event (e.g.pyrolysis products, decomposition, degradation, and both known and potential mixture reactions). Based on this information, begin developing a list of compounds of potential concern.
		(c.) The WHMD shall identify the primary location where information and documents used in previous steps 3.1 and 3.2 will be housed and ensure that information critical to response to an activity is kept in that location.

Comments:

4. Air Monitoring During Incident

PCPG in conjunction with Bureau Veritas North America, Inc., Federal (EPA, NOAA) and local hazmat response teams- As soon as can be mobilized

Status	Date Completed	Action
		(a.) If possible, model dispersion of the release with real time parameters to determine likely extent of plume and to assist local authorities making shelter-in-place or evacuation recommendations.
		(b.) Establish air monitoring equipment locations upwind and downwind of the incident (assign locations as soon as possible, using visual/meteorological data and update, as needed, with modeling results). Monitoring should continue until downwind data is consistent with upwind values.
		(c.) Air monitoring should be conducted utilizing approved methods and should include as many of the identified substances as possible. In the event of a fire/explosion, continuous particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) should be monitored as well. The Contingency Plan should indicate what kind of monitoring equipment may be necessary (e.g., $PM_{2.5}$ meters for fire events, SUMMA canisters/Tedlar bags for volatile organic compounds released from ruptured tanks), and which ones will be readily available.

Comments:

5. Post-Incident Sample Collection

PCPG in conjunction with Bureau Veritas North America, Inc., EPA, DEQ, DCH-During and/or immediately following the incident

Status	Date Completed	Action
		(a.) Develop a sampling plan for the collection of waste, groundwater, soil, ash, airborne dust, debris, surface water, and/or wipe samples, as appropriate. The plan, or the need for one, 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.
		(b.) Collect a sufficient number of samples to identify and characterize concentrations of substances involved in the incident. Include sampling for background concentrations.
		(c.) 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.
		(d.) Identify and document any substances found to be present in levels that exceed screening levels.

Comments:

6. Evaluate Data for Screening Potential Risk Yes/No (determines next step)

PCPG in conjunction with Bureau Veritas North America, Inc.- As Soon As Possible

Status	Date Completed	Action
		(a.) Screen existing data against relevant screening levels.
		(b.) Prepare RA Screening Report and submit it to the DEQ, Waste and Hazardous Materials Division (WHMD), for review as soon as possible but no more than 90 Days after the incident.
		(c.) If less than screening levels, no further action is needed for off-site potential releases upon approval of the WHMD.
		(d.) If greater than screening levels, proceed immediately to step 7.0, after notification from the DEQ.

Comments:

7. If needed, Conduct off-site RCRA RFI and Prepare Full RA Report *PCPG in conjunction with Bureau Veritas North America, Inc. (Steps 7(b.) through 7 (c.) to be completed within 180 days, if at all possible*		
Status	Date Completed	Action
		(a.) Prepare off-site RFI Work Plan and submit for review to the WHMD. Submit within 30 days from step 6 (d.) notification from DEQ.
		(b.) Commence RFI immediately after DEQ approval of step 7.1 RFI Work Plan.
		(c.) Conduct a RA on RFI data.
		(d.) Prepare and submit RFI Report to the WHMD
		(e.) Upon DEQ approval of RFI, prepare a combined CMS and CMI Plan, and submit for review to the WHMD, if directed.
		(f.) Upon DEQ approval of the CMS/CMI, implement the CMI Plan as directed.
		(g.) Provide a report to the DEQ upon completion of the CMI Plan.
Comments:		

APPENDIX 7 – VERIFICATION OF CONTINGENCY PLAN DISTRIBUTION

Sign and date the receipt of the company's Contingency Plan

EMPLOYEE SIGN-OFF SHEET	
I acknowledge I have been informed, and given a copy, of the company's Contingency Plan. I have read and understand the procedures contained therein, and I accept the policy as a working document that I will support and follow in my daily work.	
Employee's Signature:	Date:
Supervisor's Signature:	Date:
Instructor's Signature:	Date:

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