

## **Attachment 4**

### **Contingency Plan**

**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 EQ Resource Recovery, Inc (EQRR) in Romulus, Michigan. It is recommended that EQRR 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

This template is organized as follows:

**INTRODUCTION**

**A7.A BACKGROUND INFORMATION**

- A7.A.1 Purpose of the Contingency Plan
- A7.A.2 Description of Facility Operations
- A7.A.3 Identification of Potential Situations

**A7.B EMERGENCY COORDINATORS**

- A7.B.1 Identification of Primary and Alternate Emergency Coordinators
- A7.B.2 Qualifications of the Emergency Coordinators
- Table A7.B.1 Identification of Primary and alternate Emergency Coordinators
- A7.B.3 Authority to Commit Resources

**A7.C IMPLEMENTATION OF THE CONTINGENCY PLAN**

**A7.D EMERGENCY PROCEDURES**

- A7.D.1 Immediate Notification Procedures for Facility Personnel and State and Local Agencies with Designated Response Roles
- A7.D.2 Procedures to Be Used for Identification of Releases
- A7.D.3 Procedures to Be Used to Assess Potential Hazards to Human Health and the Environment
- A7.D.4 Procedures to Determine if Evacuation is Necessary and Immediate Notification of Michigan Pollution Emergency Alerting System and National Response Center
- A7.D.5 Procedures to Be Used to Ensure That Fires, Explosions, and Releases Do Not Occur, Reoccur, or Spread During the Emergency

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

A7.D.6 Procedures to Be Used to Monitor Equipment Should Facility Operations Cease

A7.D.7 Procedures to Provide Proper Treatment, Storage, and Disposal for Any Released Materials

A7.D.8 Procedures for Cleanup and Decontamination

A7.E NOTIFICATION AND RECORD KEEPING REQUIREMENTS

A7.E.1 Procedures to Be Used to Notify State and Federal Officials Prior to Commencement of Operations

A7.E.2 Record Keeping Requirements

A7.E.2(a) Operating Record

A7.E.2(b) Written Incident Report

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

A7.G PROCEDURES FOR REVIEWING AND AMENDING THE CONTINGENCY PLAN

Attachment A7.1 Documentation of Arrangements with Local Authorities

Attachment A7.2 Evacuation Plan and Routes

Attachment A7.3 Emergency Equipment Description

Attachment A7.4 Checklist for Tracking Facility Response Actions During and After a Fire/Explosion Incident

Attachment A7.5 Emergency Contact list

Attachment A7.6 Procedure for Assessing Off-Site Risk During and After an Unplanned Release

## INTRODUCTION

The information contained herein is submitted in accordance with the requirements for a Contingency Plan, as contained in the Federal Resource Conservation and Recovery Act (RCRA), 40 CFR 270.14(b)(7) and 264, subpart D and the Michigan Natural Resources and Environmental Protection Act (Act 451, Part 111), Spill Prevention, Control, and Countermeasures Plan is accordance with 40 CFR Part 112, MIOSHA R325.52129(9) and R408.10623, OSHA 29 CFR 1910.120(p)(8) and 1910.38, City of Detroit Ordinance No. 23-86, Chapter 56, Section 56-3-59.1(g)

This Contingency Plan is for EQ Resource Recovery, Inc. (EQRR) located at 36345 Van Born Road, Romulus, Michigan, 48174. EQRR is a Michigan corporation in good standing. Questions regarding this Contingency Plan should be directed to any of the Emergency Coordinators listed on Table A-7.3.

## 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 EQRR facility in Romulus, 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.

The provisions of this plan will be carried out immediately 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 the following Emergency Response Providers:

<u>Agency/Contact</u>	<u>Services Requested</u>
Police Chief City of Romulus Romulus Police Department 11165 Olive Street Romulus, Michigan 48174 Main: (734) 941-8400 24 Hour: (734) 941-1111	Crowd Control Evacuation Notification
Fire Chief City of Romulus Romulus Fire Department 28777 Eureka Road Romulus, Michigan 48174 Main: (734) 941-8585 24 Hour: (734) 941-1111	Fire Prevention Fire Fighting Evacuation Notification
City of Romulus Emergency Planning Committee 28777 Eureka Romulus, Michigan (734) 941-8585	Evacuation Notification Technical Assistance
EQ Industrial Services 2701 N. I-94 Service Drive Ypsilanti, Michigan 48146 (734) 547-2521	Spill Response Contamination Mitigation
Concentra Medical Center 11700 Metro Airport Center Suite 104 Romulus, MI 48174 (734) 955-7000	First Aid Medical Treatment of Injured Employees (minor injuries)
Hospital Administrator Annapolis Hospital 33155 Annapolis Wayne, Michigan 48184 (734) 467-4000	First Aid Medical Treatment of Injured (serious injuries or non-employees)

**Agency/Contact**

**Services Requested**

Vice-President Administration  
Community EMS  
25400 W. Eight Mile Rd.  
Southfield, MI 48034  
(810) 356-3900 Ext. 228

Transport of Injured to Medical  
Facilities

MDEQ-EAD (SERC)  
P. O. Box 30457  
Lansing, MI 48909-7957  
(800) 662-9278

Technical Assistance

Attachment A7.1 includes documentation that each of these agencies has received a copy of the Contingency Plan. Whenever the Contingency Plan is modified, the facility will provide the agencies with a copy of the modified plan.

**7.A.2 Description of Facility Operations**

EQRR will store waste in the following locations:

- Twenty-three (23) bulk storage and treatment tanks for waste solvents, each located within a concrete containment structure.
- A container management building with a capacity of 640 55-gallon drums or equivalents.

EQRR reclaims used organic solvents through distillation methods for return to the original source or for distribution to the general market. Bottoms from the distillation methods and other waste materials may also be blended into hazardous waste derived fuels.

**A7.A.3 Identification of Potential Situations**

Any release of hazardous waste or hazardous waste constituents is a potential trigger for executing this contingency plan. The EQRR facility is designed, equipped, and operated to prevent the occurrence of these releases. However, EQRR cannot control the condition of vehicles that deliver and receive hazardous wastes from the facility. A significant leak or spill from one of these vehicles outside of the facility's secondary containment system is one example of a triggering event.

**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/or 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]

The Emergency Coordinators are members of the EQRR management team and are thoroughly familiar with the purpose and actions of facility's contingency plan. Additionally, the Emergency Coordinators understand all activities and process operations at the facility, the location and characteristic of wastes being handled, the location of all records within the facility, and the facility layout.

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

**EQ Resource Recovery, Inc, Romulus, Michigan**

Priority	Name	Address	Work Phone	Home Phone	Cell (optional)
Primary Coordinator	Todd Brinkel	2985 Green Valley, Ann Arbor, MI 48103	734-727-5551	734-997-0490	734-740-3381
First Alternate Coordinator	Jason Lewis	359 East Coon Lake Road, Howell, MI 48843	734-727-5521	517-540-1975	734-576-0369
Second Alternate Coordinator					
Third Alternate Coordinator					

**A7.B.3 Authority to Commit Resources**  
 [R 299.9607 and 40 CFR §264.55]

The Emergency Coordinators are members of the EQRR management team and are responsible for the ongoing daily operations of the facility. To perform these responsibilities they have financial authority to provide for readily available materials and resources in support of this contingency plan and other emergency actions. Additionally, the Emergency Coordinators have direct reporting responsibilities to senior management in the event greater financial support is needed.

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

The emergency coordinator must be contacted immediately in the occurrence of any situation that may result in potential or actual threats to human health or the environment. The emergency coordinator must implement this plan whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

The following situations are provided as guidance to facility personnel as the conditions or circumstances under which the plan must be implemented:

A fire and/or explosion that releases hazardous waste or hazardous waste constituents to the water or air.

An unplanned reaction or equipment malfunction that releases hazardous waste or hazardous waste constituents into the environment as air emissions that could affect human health or the environment.

Any direct release of hazardous waste or hazardous waste constituents to surface water or groundwater of the state.

Releases from spills and/or serious leaks that could affect human health or the environment. This could include spills or leaks to secondary containment if air emissions could affect human health.

If one of the events described above occurs or if any fire, explosion, or any other unplanned release of hazardous waste or hazardous waste constituents occurs the emergency coordinator will be contacted. The emergency coordinator can be reached via telephone or cell phone using the phone numbers posted on the emergency contact list posted throughout the facility and attached to this document as Attachment A7.5.

#### **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 A7.6.

In the event of an imminent or actual emergency situation the Emergency Coordinator will be notified first; subsequently, additional facility personnel, and the appropriate federal, state, or local agencies, and fire and police departments listed on Attachment A7.5 will be notified by or at the direction of the Emergency Coordinator.

The Emergency Coordinator will assess possible hazards to human health or the environment, considering both direct and indirect effects of the release, fire, or explosion. The initial response to any emergency will be to protect human health and safety, and then the environment.

Company personnel will be on standby during all general plant emergencies. During times of power failure or severe weather, personnel will be assigned to protect personnel and property. If

the Emergency Coordinator determines that the company is unable to handle the emergency, then local, state and federal authorities will be notified of the situation. Evacuation of all potentially affected plant areas will be initiated as soon as possible.

Because of the distance of the closest urban area and the consistent prevailing wind direction, it is unlikely that evacuation of the general population would be necessary in the event of a spill or release. Industrial and commercial operations in the immediate area will be advised of the release and any possible need for evacuation. If the Emergency Coordinator's assessment indicates that evacuation of local areas may be advisable, he will immediately notify the appropriate authorities (See Attachment A7.5). He will be available to help appropriate officials decide whether local areas should be evacuated. Potential incidents fall under two general classifications: (1) fire and/or explosion and (2) spills or material release. Natural disasters, such as tornadoes, are assumed to fall into one of these two classifications. A fire, explosion, or other emergency must be reported to the Emergency Coordinator.

#### **A. Fire Response**

If a fire should break out, the emphasis will be placed on preventing the fire from spreading to nearby areas. If the fire is limited and does not involve significant quantities of flammable material then fire-fighting efforts may be carried out by company personnel until outside assistance has arrived (fire fighting will not be done at risk of injury). The following actions will be taken in the areas affected by the fire or explosion:

- 1) Doors in buildings will be closed, the electronic gate opened.
- 2) Hazardous work in all areas and transferring operations will be shut down immediately.
- 3) All feed lines and additional equipment will be shut down, as necessary and practical.
- 4) The Emergency Coordinator will be contacted (See Table A7.B.1).
- 5) The Emergency Coordinator will activate the evacuation alarm and the facility will be cleared of all personnel not actively involved in fighting the fire. Those persons not responsible for emergency response are to report to the designated rally point for accountability. The rally point is designated in Attachment A.7.2.
- 6) All injured persons will be removed and qualified personnel will administer medical treatment.

Early containment of fires can significantly decrease total damages. Area or plant evacuation may be necessary in case of major fire, explosion or reaction of incompatible materials. Specifics are outlined under general evacuation procedures. All personnel have been trained in evacuation procedures and means of exit from their respective work areas.

#### **B. Spills or Material Release**

The Emergency Coordinator will immediately identify the character, exact source, and amount and area extent of the incident. The initial identification methods will be to utilize visual analysis of the material and location of the release. The hazardous wastes stored in containers and in bulk tanks located at the processing facility generally exhibit similar characteristics for safety and emergency handling, namely, Flammable Liquid.

Because fire is always a potential hazard in spills of flammable materials, possible sources of ignition will be eliminated. Vehicular traffic and hazardous work in the area will cease until the spill is contained and safe conditions have been restored. If spilled materials are



flammable liquids, company personnel will respond with portable extinguishers and water as appropriate.

In the event of a major emergency involving a chemical spill, the following general procedures will be used for a rapid and safe response and to gain control of the situation. Emergency Contacts found in Attachment A7.5 provide a quick reference to follow in the event of a major spill. If an employee discovers a chemical spill resulting in a vapor release, he or she will immediately report to their immediate supervisor. The supervisor will then contact the Emergency Coordinator. The Emergency Coordinator will obtain information pertaining to the following:

- 1) The material spilled or released.
- 2) Location of the release or spillage of hazardous material.
- 3) An estimate of quantity released and the rate at which it is being released.
- 4) The direction in which any vapors are heading.
- 5) Any injuries involved.
- 6) Fire and/or explosion possibilities.
- 7) The area and material involved and the intensity of any fire and explosion.

This information will help the Emergency Coordinator to assess the magnitude and potential seriousness of the spill or release. If the incident is determined to lie within the company's emergency response capabilities, the Emergency Coordinator will contact and deploy the necessary plant personnel.

In the event of a leak or spill occurs within the containment area, all feed and transfer lines will be closed. Immediately after the spill is detected, any standing liquids will be pumped to an appropriate tank or collected and transported to a facility approved to handle the specific waste.

If for some reason a spill is not contained within the containment structure, an area of isolation will be established around the spill. The size of the isolation area will generally depend on the size of the spill and the material involved. If the spill is large and involves a tank or a pipeline rupture, an initial isolation area of at least 100 feet in all directions will be used. Small spills or leaks from a tank or a pipe will require evacuation of at least 50 feet in all directions to allow cleanup and repairs and to prevent exposure. When any spill occurs, only those persons involved in overseeing or performing emergency operations will be allowed within the designated hazard area. The area will be roped or otherwise blocked off.

### **C. Small Spills**

The following guidelines will be used in case of a minor incident involving waste material. These are general guidelines. Circumstances may dictate some alternative to these procedures. Most waste spills and leaks are easily contained within the dikes and sumps provided in the various storage areas. Small spills occurring in a containment area are directed to the sump provided in that area. A portable sump pump is used to pump the recovered waste material into an appropriate storage tank.

### **D. Large Spills**

For large spills or serious leaks where life may be endangered, the following guidelines will be followed as closely as possible:

- 1) If a leak develops or a spill occurs from a waste storage tank, pipeline pump, etc., the person discovering the discharge will leave the immediate area and contact the Emergency Coordinator. The Emergency Coordinator will obtain the following information:
  - a) Person(s) injured and seriousness of injury.
  - b) Location of the spill or leak, material involved, and the source (tank, pipelines, etc.).
  - c) The approximate amount spilled, an estimate of the liquid discharge rate, and the direction the liquid is moving.
  - d) Whether or not a fire is involved.
  
- 2) Next, the Emergency Coordinator will:
  - a) Initiate evacuation of the hazardous area. For small spills, isolate at least 50 feet in all directions. For large spills, initially isolate at least 100 feet in all directions and keep all persons upwind of spill.
  - b) Obtain medical attention for any injured persons.
  - c) Call the fire department if a fire cannot be extinguished by plant personnel.
  - d) Dispatch emergency personnel to the site to take appropriate action.
  - e) Contact the proper authorities (Attachment A7.5) if the spill or release is large. Contact local authorities first so that, if necessary, persons downwind of the vapor can be notified.
  
- 3) Response personnel will:
  - a) Make sure all unnecessary persons are removed from the spill area.
  - b) Put on protective clothing and equipment.
  - c) If flammable waste is involved, remove all ignition sources, and use spark and explosion proof equipment and protective clothing in the containment area.
  - d) If possible, try to stop the leak.
  - e) Determine the major components in the waste at the time of the spill.
  - f) Use absorbent pads, booms, earth, sand and other inert materials to contain, divert and clean up a spill if it has not been contained by a dike or sump. Most spills contained within the dike or sump can be pumped back into the appropriate storage tank or container.
  
- 4) Cleanup personnel will:
  - a) Place all containment and cleanup material (including clothing) in containers for proper disposal.
  - b) Place all recovered liquid wastes and contaminated soil in containers for removal to an approved site.
  - c) Decontaminate facility equipment including secondary containment using appropriate measures such as the use of a water-based industrial detergent, up to a high pressure stream cleaning, and a flush or rinse with clean water. Wastewaters generated from the decontamination process will be contained and disposed of properly.

**E. Actions to be Taken in the Event of Significant Fire and/or Explosion or Other Unplanned Off-Site Release**

Enact and follow the facility standard operating procedure QES-OP-950-ROM (“Procedure for Assessing Off-Site Risk During and After an Unplanned Release”) to obtain information needed to assess the off-site risk posed by the triggering incident and support the development of a Risk Assessment Screening Report. The written standard operating procedure QES-OP-950-ROM is located in Attachment A7.6 to this contingency plan. Many of the actions required by QES-OP-950-ROM are to be performed by EQ personnel. However, much of the off-site sampling, monitoring, and report preparation will, in all likelihood, have to be performed by a duly authorized governmental agency as notified below at part A7.5.

**F. Other Spill Containment Measures**

In the event of a large spill or release outside of a containment area, a clay dike/slurry wall and an associated underdrain that collects all on-site groundwater protects the off-site groundwater. The clay dike/slurry wall is constructed so that groundwater from any point on the approximately fourteen-acre site is prohibited from leaving. The underdrain is constructed to collect all groundwater.

**G. Prevention of Recurrence or Spread of Fires, Explosions or Releases**

Actions to prevent the recurrence or spread of fires, explosions or releases include stopping processes and operations, collecting and containing released waste, and recovering or isolating containers. In addition, if the facility stops operations in response to an emergency, the Emergency Coordinator will monitor valves, pipes and other equipment for leaks and pressure build-up.

**H. Decontamination Procedures**

All personnel, clothing, and equipment leaving the site must be decontaminated to remove harmful chemicals that may have adhered to them. Disposable items will be containerized and appropriate arrangements made for disposal. Non-disposable items will have gross contamination removed by physical means involving dislodging/ displacing, rinsing, wiping off and evaporation.

**A7.D.1 Immediate 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]

In the event of a potentially dangerous situation all contract personnel and visitors will be immediately cleared from the plant area and instructed to report to the Rally Point as specified in Figure A-7.2.

The Emergency Coordinator is responsible for determining which emergency situations require enactment of the contingency plan. In the event of a plant evacuation, an audiovisual alert system will be used to initiate evacuation of all plant areas. This system utilizes actuation controls that are located throughout the facility. In addition to the audiovisual alert, the internal telephone system and two-way radios are used to notify personnel as to the nature of the emergency and recommended plan of action. The evacuation routes are shown in Attachment A7.2.

1. A visual flashing light and/or audible alarm from the emergency alerting system will be indication that evacuation procedures should begin at once. This notification may be supplemented by telephone intercom and 2-way radio notifications. These notifications will be made with a statement similar to the following:

*"An emergency evacuation of the site has been declared by the Emergency Coordinator. All personnel and visitors must now evacuate immediately to the Rally Point located at Van Born west of the plant entrance."*

2. All personnel should remain calm and exit via the main plant entrance.
3. Upon evacuation, all personnel should report to the Rally Point at once. This procedure is essential in order to account for all personnel and visitors who may have remained in the plant area. A roll call will be conducted utilizing the Site Security Log, Visitor Log, and employee time cards.
4. EQRR personnel are responsible for escorting any visitors or outside contractors with them, should evacuation be necessary.
5. Attempts to locate missing persons will occur only if the attempt will not endanger the rescuer.
6. Drills are held to practice all of the procedures and are treated with the same seriousness as an actual emergency.

The list of emergency contacts in Attachment A7.5 identifies local emergency response agencies, and state and federal authorities that must be notified in the event of an imminent or actual emergency situation requiring response. The emergency coordinator will be responsible for ensuring that all appropriate authorities are notified as necessary based on the emergency coordinator's assessment of conditions.

If the assessment indicates that evacuation of local areas may be advisable, he will immediately notify the appropriate authorities (See Attachment A7.5). The emergency coordinator will be available to help appropriate officials decide whether local areas should be evacuated.

The Emergency Coordinator will immediately notify the National Response Center at 800-424-8802 and MDEQ SE MI Waste Management Division (734) 953-8905 during business hours or the MDEQ PEAS system at 1-800-292-4706 after hours. The report will include:

- a) Name and telephone number of the reporter.
- b) Name and address telephone number, and EPA Identification number of the facility.
- c) The name, address and telephone number of the operator/owner.
- d) The date, time and type of incident (e.g., release, fire).
- e) Name and quantity of material(s) involved, to the extent known.
- f) The extent of injuries, if any.
- g) The disposition of recovered material, if any.
- h) The possible hazards to human health and the environment outside the facility.
- i) The immediate response action taken.

If the release has entered the sewer within one hour of becoming aware of the discharge telephone the DWSD System Control Center to inform DWSD about detail of the discharge.

As called for in regulations developed under the Comprehensive Environmental Liability and Compensation Act of 1980 (Superfund), our practice is to report a spill (outside of any containment area) of any hazardous material for which a reportable quantity has not been established.

**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 utilize information from hazardous waste manifests, tank logs, container records, computer database, waste characterizations, material safety data sheets, tank controls, visual observations, engineering approaches, employee reports, and other documentation maintained by the facility to determine the source, amount, and location of any hazardous waste release.

**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 will assess possible hazards, both direct and indirect, to human health or the environment that may result from the release, fire, or explosion.

The emergency coordinator will assess the potential hazard to human health and the environment based upon an assessment of the emergency conditions. The coordinator's assessment will consider the following factors in making this determination:

The size of any fire, spill, explosion, release, or other event

The volume of materials involved in a spill or leak

Potential to develop explosive limits if ignitable

The characteristic and risks of the materials involved in the incident (ignitibility, evolution of fumes, toxicity, reactivity, oxidizing potential)

Temperature, wind direction and wind velocity

The ability of the material to produce vapor (vapor pressure)

The potential for an uncontrolled reaction to occur

Air monitoring information if available

If the release is limited to secondary containment

Can the material reach surface waters

Can the material reach storm drains or sewer systems

Physical reactions with chemical agents used to contain or neutralize the released material

If the emergency coordinator determines that a hazard to human health or the environment exists the emergency coordinator will contact local emergency providers, Romulus Fire and Police Departments, to initiate evacuation of the nearby community.

The emergency coordinator will also contact the National Response Center and the PEAS Hotline for alerting to Michigan DEQ.

Attachment A7.5 contains a list of Federal, State and Local Emergency Contacts.

**A7.D.4 Procedures to Determine if Evacuation Is Necessary and Immediate 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]

The emergency coordinator will determine the need for facility evacuation, or potential evacuation of surrounding areas based upon an assessment of the emergency conditions or at the request of an outside authority or agency that takes the role of incident commander. The coordinator's assessment will consider the following factors in making this determination:

The size of any fire, spill, explosion, release, or other event

The characteristic and risks of the materials involved in the incident such as ignitibility, evolution of fumes, toxicity

Temperature, wind direction and wind velocity

Risk to safety and health of employees or community

If the emergency coordinator's assessment indicates that evacuation of facility areas may be advisable, he will implement the evacuation plan for the facility. If the emergency coordinator's assessment indicates that evacuation of the surrounding local areas is also advisable, the appropriate local authorities will be immediately notified (see Attachment A7.5). The National Response Center will also be notified, 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

The facility's evacuation plan is included in this Contingency Plan as Attachment A7.2.

**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]

The facility is designed, equipped, and operated to prevent fires, explosions, and releases. All hazardous waste is stored within closed storage tanks located within secondary containment or stored in drum and tote containers that are located within enclosed structures and secondarily contained. The facility is designed and constructed to meet requirements of the NFPA standards.

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:

During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, or releases do not recur or spread to other areas of the facility, or off site. Actions that may be employed include:

- Review pollution control device operation for safe operation during event.
- Suspend all hot work activity at the facility.
- Shutdown the steam boiler and its related equipment if it is safe to do so.
- Close tank valves, suspend transfers, and place process in standby if safe to do so.
- Shutdown connected, related, or nearby processes and operations if safe to do so.
- Eliminate site vehicular traffic unless related to the emergency response.
- Collect released materials when it determined safe to do so.
- Isolate the collected waste until proper disposal can be arranged.
- Over-pack and isolate any ruptured containers.

Attachment A7.3 contains a description of emergency equipment located at the facility.  
Attachment A7.5 contains a list of Federal, State and Local Emergency Contacts.

**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 is required to shut down for a period of time as the result of a contingency plan incident the emergency coordinator shall ensure that the following occur:

- Boilers and related equipment are cooled and depressurized safely.



Equipment and controls are shut down in an orderly manner following any plant shutdown procedures that may exist.

Close tank and equipment valves as necessary to eliminate gravity flow or leakage to any possible damaged areas of the facility.

Make sure all containments are inspected and maintained empty until operations are resumed. This may require outside services or equipment if the facility cannot resume operations for several days.

Ongoing inspection for fluid or gas leaks at tanks, valves, fittings, etc.

Notifications as may be required for any pollution control equipment that is shut-down beyond permit allowed down-time.

**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)]

Any materials collected from the clean-up of a hazardous waste release will be sampled and temporarily stored until a waste characterization can be developed for its final disposal. This may require review of the original waste characterization, additional chemical analysis, and/or collection of Material Safety Data Sheets. Once a final disposal method has been determined the material will be disposed of in accordance with the facility's Hazardous Waste Facility Operating License.

**A7.D.8 Procedures for Cleanup and Decontamination**

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

Emergency equipment used in response to a spill, fire, explosion, or other release will be decontaminated, repaired, or replaced prior to its use or re-use. The emergency coordinator must verify the following:

All emergency equipment used has been cleaned, replaced, or recharged and is otherwise ready for its originally intended use.

Facility surfaces that may have been affected by the release or its collection and removal have been decontaminated and cleaned so that normal operations may resume without risk of incompatible material contact.

Collected materials from the original release, any absorbents, clean-up residues, and decontamination materials have been placed into compatible containers and are labeled and stored appropriately prior to final disposal.

**A7.E NOTIFICATION AND RECORD KEEPING REQUIREMENTS**

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



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

**A7.E.1 Procedures to Be Used to Notify State and Federal Officials Prior to Commencement of Operations**

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

Before operations are resumed in the affected area(s) of the facility, EQRR must notify the U.S. Environmental Protection Agency (EPA) Regional Administrator, Director of the Michigan Department of Environmental Quality (MDEQ), and local authorities that in the affected areas of the facility:

- 1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
- 2) All emergency equipment listed in this contingency plan is cleaned and fit for its intended use before operations are resumed.
- 3) Affected equipment and design is restored to the condition originally approved in the Operating License.

EQRR must note in the operating record the time, date and details of any incident that required implementing the contingency plan.

Before operations are resumed, an inspection of all emergency equipment will be conducted. The emergency coordinator must notify the EPA, DEQ, and local authorities that post-emergency equipment maintenance has been performed and operations at the facility will be resumed.

The above notifications can be completed using the contact list located in Attachment A7.5

**A7.E.2 Record Keeping Requirements**

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

**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 EQRR and can be found at the following location: 36345 Van Born Road in Romulus.

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

Within 15 days of an incident requiring implementation of the Contingency Plan, the EQRR facility will submit a written incident report to the EPA Regional Administrator and the Director of the DEQ.

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)]

A copy of the EQ Resource Recovery, Inc. internal standard operating procedure QES-OP-950-ROM titled "Procedure for Assessing Off-Site Risk During and After an Unplanned Release" is located in Attachment A7.6. This document meets the requirements of this section.

**A7.G PROCEDURES FOR REVIEWING AND AMENDING THE CONTINGENCY PLAN**  
[R 299.9607 and 40 CFR §264.54]

The Contingency Plan will be reviewed and amended, if necessary, whenever:

- The facility permit is revised;
- The Contingency Plan fails in an emergency;
- The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fire, explosion, or releases of hazardous waste or changes the response necessary in an emergency;
- The list of Emergency Coordinators changes; or
- The list of emergency equipment changes.

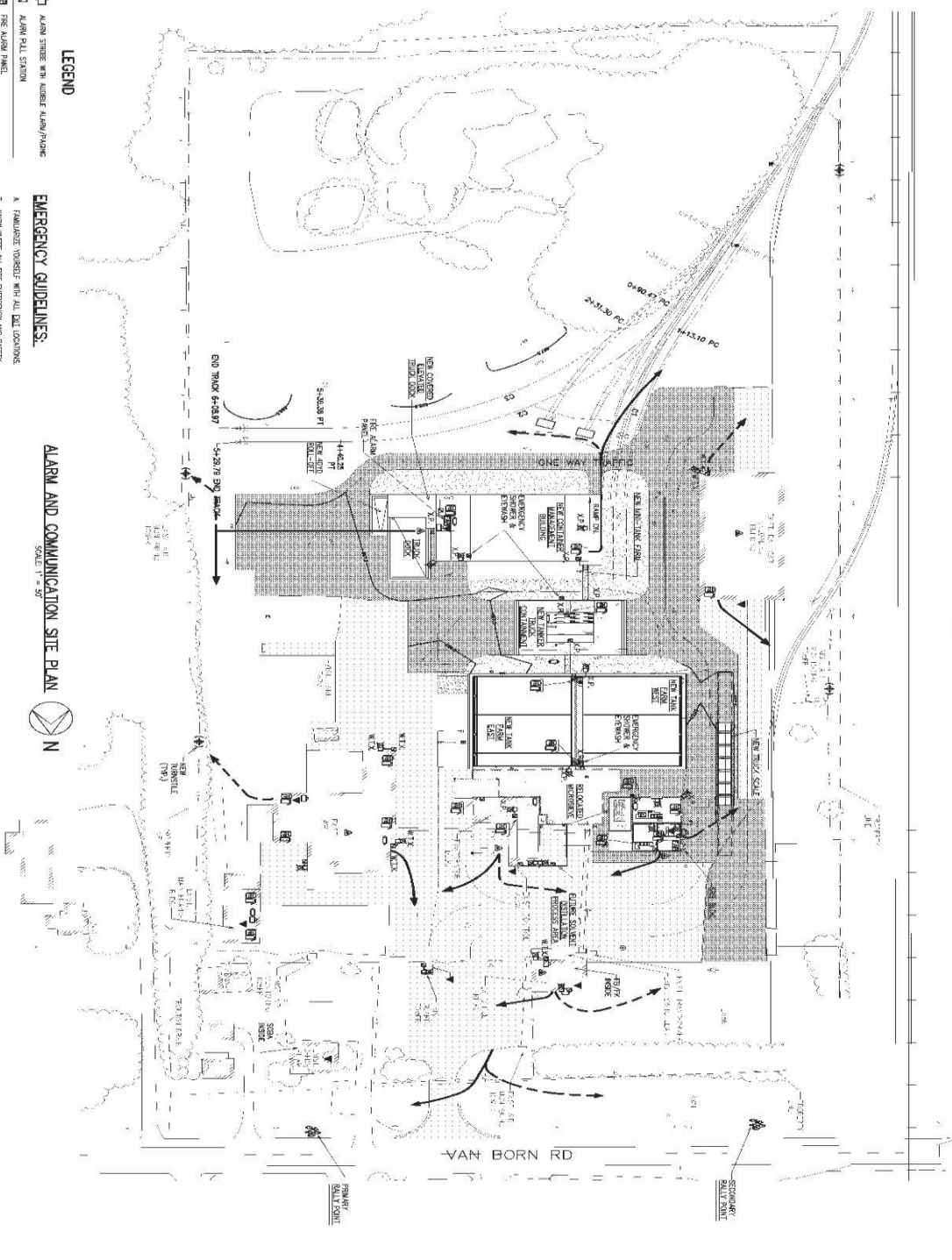
If the Contingency Plan is modified for any reason, updated copies will be sent, return receipt requested, to the organizations listed on Section A-7.A.1 and notification of the changes will be sent to members of the facility mailing list.

**Attachment A7.1:**

**Documentation of Arrangements with Local Authorities**

(this is a new contingency plan that has not been submitted to providers)

**Attachment A7.2:**  
**Evacuation Plan and Routes**



**LEGEND**

- ALARM STROBE WITH NUMBER ALARM/PHONE
- ALARM BELL STATION
- FRM ALARM PANEL
- EMERGENCY SPOKE & ETHERNET
- FRM BLANKET
- ETIMOSER
- SMAL CONTROL KIT
- FRM CRT
- TELEPHONE
- STAIRWAY
- FRM AD KIT
- BULLY POINT (ASSEMBLY AREA)
- ALTERNATE EVACUATION ROUTES
- PRIMARY EVACUATION ROUTES
- EXIT TURNSTILE (ONE WAY)
- EXIT TURNSTILE (TWO WAY)
- WATCHPOST AND CORPUS RESISTANCE

**EMERGENCY GUIDELINES:**

1. FAILURE TO RESPOND WITH ALL BELL LOCATIONS
2. KNOW WHERE ALL FIRE EXTINGUISHERS AND SHELTERS ARE LOCATED
3. EVALUATE WHEN EVACUATION SIGNAL IS SOUNDED AND PROCEED TO DESIGNATED SHELTER/ASSEMBLY AREA
4. ONCE EVACUATED, REMAIN IN BULLY AREA UNTIL TELLER IS SOUNDED
5. SUPERVISORS WILL STAY AS LONG AS IN THE SHELTER OR EVACUATION ASSEMBLY POINT AREA
6. PRIMARY ROUTES TO SHELTERS
7. RESPONSIBILITIES OF THE EVACUATION STAFF (SEE EMPLOYEE MANUAL FOR DETAILS)
8. ASSEMBLY AREA, ALTERNATE BULLY (ASSEMBLY) AREA SHOULD BE USED WHEN PRIMARY AREA'S UNAVAILABLE

**EVACUATION ALERTS:**

1. EVACUATION SIGNAL: "EVACUATE THE BUILDING IMMEDIATELY" EVACUATION SIGNAL WILL BE SOUNDED WITH THE BELL PLANT HAS BEEN EVACUATED.
2. ALL CLEAR SIGNAL: "RETURN TO WORKPLACE" EVACUATION SIGNALS OF THE BELL PLANT WORK THIS SIGNAL WILL BE SOUNDED AS LONG AS NECESSARY.

**ALARM AND COMMUNICATION SITE PLAN**  
 SCALE: 1" = 50'  
 N

<p><b>HRC</b>          HUBBARD, ROSE &amp; CHAM, INC.          1000 W. VAN BORN ROAD          BOWLING GREEN, OH 43403          PHONE: 614.891.2000          FAX: 614.891.2002          WWW.HRCINC.COM</p>	<p><b>EMERGENCY EQUIPMENT &amp; EVACUATION ROUTES</b></p> <p>NO. 2009033          1" = 50'-0"          10/10/2008</p>	<p><b>RE-ENGINEERING AND DESIGN OF EO RESOURCE RECOVER, INC. VAN BORN ROAD PLANT</b></p> <p>PROJECT: K.L.C. ROAD B.I.E. ROAD L.R.A. ROAD P.T.E.</p>	<p>DATE: 10/10/2008</p>
---	---	---	-------------------------

**Attachment A7.3:**  
**Emergency Equipment Description**

EMERGENCY & DECONTAMINATION EQUIPMENT

Equipment	Description	Capabilities	Locations
Fire Extinguishers	10 to 150 Pounds Types: A,B,C B,C A,B	Extinguishes fires involving wood, cloth, paper, flammable liquids, oils, grease, paint, lacquers electrical equipment	Container Mgmt. Bldg. Drum Pumping LUWA Building East Loading Pad WWTP/Used Oil Processing Storage Tank Areas GW Pump House Area Laboratory Maintenance Building Plant Offices Administrative Office
Fire Hydrant	City of Romulus Service	Provide water for extinguishing fires	SE Corner Admin Bldg. SW Corner LUWA Bldg. SE Corner Rail Building SW Corner CMB SE Corner CMB SE Corner Main Tank Farms NW Corner WWT Plant
Absorbents	Clay absorbents	Collecting spilled material	Throughout Plant
Shovels, brooms, squeegees	Wood, Rubber, & Plastic	Collecting spilled material	Throughout Plant
Emergency Alarm System	Audiovisual Alarm	Signal employees to evacuate.	Administrative Office Security Office Main Tank Farm Load Unload Pad LUWA & Frac Control Rooms CMB Office SW Corner WWT Plant NW Corner WWT Plant NE Corner WWT Plant SE Corner Rail Building
Two-Way Radios	Hand-Held	Communication between on-site personnel	Operations Manager Plant Manager Administrative Office Shift Supervisors Plant Personnel Security Office
Recovery Drums (over-packs)	85-gallon	Contain leaking containers	Container Mgmt. Bldg.

EMERGENCY & DECONTAMINATION EQUIPMENT  
 (continued)

Equipment	Description	Capabilities	Locations
Hi-Lo	Fork lift attachment Explosive proof LP Gas operated	Move response equipment and collect spilled material	Throughout Plant
Emergency Shower and eyewash	Water Drench shower	Remove chemicals from eyes and body	Container Mgmt. Bldg. Load/Unload Area Main Tank Farms Outside Analytical Laboratory Inside NW Bay of WWT Plant
Emergency Eye Wash Stations	Eye wash bottle and solution	Remove foreign matter from eyes	Container Mgmt. Bldg. Load/Unload Area Main Tank Farms Outside Analytical Laboratory Inside NW Bay of WWT Plant
First Aid Kits	Bandage material Splints Antibacterial Ointments Anesthetic Eye wash bottle & solution	Administer First Aid to injured persons	Administrative Office Break/Lunch Trailer Analytical Laboratory Employee Showers
Boots	Rubber Neoprene	Protection of response personnel	Inventory Storage Room Employee Issued
Gloves	Cotton Latex Rubber	Protection of response personnel	Inventory Storage Room Employee Issued
Hard Hats	Plastic	Head protection	Inventory Storage Room Administrative Office Employee Issued
Coverall suits	Tyvek-White	Personnel protection from chemical exposure	Inventory Storage Room Employee Issued
Face Shields, protective eye glasses, chemical splash goggles	Plastic	Eye protection	Inventory Storage Room Administrative Office Employee Issued



EMERGENCY & DECONTAMINATION EQUIPMENT  
(continued)

<b>Equipment</b>	<b>Description</b>	<b>Capabilities</b>	<b>Locations</b>
Disposable respirators	Paper	Respiratory protection for response personnel	Employee issued
Chemical cartridge respirators with organic vapor cartridges		Respiratory protection for response personnel	Employee issued

**Attachment A7.4:**

**Checklist for Tracking Facility Response Actions During and After  
A Fire/Explosion Incident**

### INCIDENT REPORTING CHECKLIST

When the facility has had any fire, explosion, or a release of a hazardous waste or hazardous waste constituent which could threaten human health or the environment or has knowledge that the spill has reached surface or groundwater, the emergency coordinator should begin the following notification process to report the incident.

#### Immediate Reporting

- 1) If an assessment indicates that evacuation of local areas may be advisable, immediately notify the Romulus Police and Fire Departments (911). Be available to provide any information that can help the incident manager determine affected areas and distances.
- 2) The Emergency Coordinator will immediately notify the National Response Center at 800-424-8802 and Michigan DEQ SE MI District Office (586) 753-3700 during business hours or the MDEQ PEAS system using 911 or 1-800-292-4706 after hours. Be prepared to report the following details:
  - b) Name and telephone number of the person reporting.
  - c) Name and address telephone number, and EPA Identification number of the facility.
  - d) The name, address and telephone number of the operator/owner.
  - e) The date, time and type of incident (e.g., release, fire).
  - j) Name and quantity of material(s) involved, to the extent known.
  - k) The extent of injuries, if any.
  - l) The disposition of recovered material, if any.
  - m) The possible hazards to human health and the environment outside the facility.
  - n) The immediate response actions taken.
- 3) If the release has entered the sewer within one hour of becoming aware of the discharge telephone the DWSD System Control Center to inform DWSD about the nature of the discharge.

As called for in regulations developed under the Comprehensive Environmental Liability and Compensation Act of 1980 (Superfund), our practice is to report a spill (outside of any containment area) of any hazardous material for which a reportable quantity has not been established.

Before operations are resumed in the affected area(s) of the facility, EQRR must notify the U.S. Environmental Protection Agency (EPA) Regional Administrator, Director of the Michigan Department of Environmental Quality (MDEQ), and local authorities that in the affected areas of the facility:

- 1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
- 2) All emergency equipment listed in this contingency plan is cleaned and fit for its intended use before operations are resumed.
- 3) Affected equipment and design is restored to the condition originally approved in the Operating License.

EQRR must note in the operating record the time, date and details of any incident that required implementing the contingency plan.

## Post Incident Reporting

### 1) Five-Day Written Response

#### a) EPA and/or Michigan DEQ

Within 5 days of becoming aware of the incident EQRR must submit a written report of the incident to the EPA Regional Administrator and/or the MDEQ Chief of the Waste and Hazardous Materials Division. The report must include:

- 1) Name, address and telephone number of the owner or operator.
- 2) Name, address and telephone number of the facility.
- 3) Date, time and type of incident (e.g. release, fire, and/or explosion).
- 4) Name and quantity of material(s) involved.
- 5) The extent of injuries, if any.
- 6) An assessment of actual or potential hazards to human health or the environment, where this is applicable.
- 7) Estimated quantity and disposition of recovered material that resulted from the incident.
- 8) A description of the occurrence and its cause.
- 9) Statement as to whether the non-compliance has been corrected. If not, the anticipated time/date it is expected to continue.
- 10) Steps taken or planned to reduce, eliminate, and prevent recurrence and when those activities will occur.

#### b) Detroit Water & Sewerage – Industrial Waste Control Division

If the incident involved a discharge to the sewer system then within five calendar days of becoming aware of the incident a report must be filed with DWSD. The report is to include:

- 1) A description of the discharge and the cause of the incident
- 2) The duration of the incident including exact dates and times or, if not corrected, the anticipated time the incident is expected to continue.
- 3) Steps being taken and/or planned to reduce, eliminate and prevent similar future occurrences of the incident.

### 2) Fifteen Day Written Response

#### a) EPA and/or Michigan DEQ

Within 15 days of becoming aware of the incident EQRR must submit a written report of the incident to the EPA Regional Administrator and/or the MDEQ Chief of the Waste and Hazardous Materials Division. The report must include:

- 1) Name, address and telephone number of the owner or operator.
- 2) Name, address and telephone number of the facility.
- 3) Date, time and type of incident (e.g. release, fire, and/or explosion).
- 4) Name and quantity of material(s) involved.
- 5) The extent of injuries, if any.
- 6) An assessment of actual or potential hazards to human health or the environment, where this is applicable.
- 7) Estimated quantity and disposition of recovered material that resulted from the incident.
- 8) A description of the occurrence and its cause.

- 9) Statement as to whether the non-compliance has been corrected. If not, the anticipated time/date it is expected to continue.
- 10) Steps taken or planned to reduce, eliminate, and prevent recurrence and when those activities will occur.

b) EQ Resource Recovery, Inc.

In addition to these reporting requirements for state and federal authorities, EQRR also has internal reporting requirements. The following information and incidents require that a report be completed and returned to the General Manager within 10 days:

- 1) Emergency equipment used in response to the emergency and description of how equipment was cleaned and prepared for future use.
- 2) Description of the steps taken to prevent a similar incident in the future.
- 3) All fires.
- 4) Unusual vapor releases.
- 5) Reportable chemical spills.
- 6) All injuries except minor cuts or bruises.
- 7) All equipment damage due to malfunction or operating error.
- 8) All near miss incidents that could have resulted in injury or damage.

**Attachment A7.5:**  
**Emergency Contacts Response Agencies and Organizations**

EPA ID # MID 060 975 844



EQ Resource Recovery, Inc.  
36345 Van Born Road  
Romulus, MI 48174

## EQ RESOURCE RECOVERY, INC. EMERGENCY CONTACT PERSONNEL / RESPONSE AGENCIES AND ORGANIZATIONS

**\*Dial 9 to get an outside line from any office phone**

### EMERGENCY COORDINATOR:

Todd Brinkel  
734-727-5551 (office)  
734-740-3381 (cell)  
734-997-0490 (home)

### EMERGENCY MEDICAL SERVICES:

EMS: 911  
Oakwood Hospital/Annapolis Center: 734-467-4000  
BHS Western Wayne Urgent Care: 734-259-0500 (non-emergency use 8 am-8 pm)  
Concentra Medical Center: 734-955-7000 (non-emergency use - after hours)

### ALTERNATE EMERGENCY COORDINATORS:

Jason Lewis  
734-727-5521 (office)  
734-576-0369 (cell)  
517-540-1975 (home)

### GOVERNMENTAL AGENCIES:

National Response Center (RC): 800-424-8802  
Michigan DNRE (during business hours): 517-373-7660  
Pollution Emergency Alerting System (after hours): 911 or 800-292-4706  
U.S. Coast Guard: 313-331-3110 (spill to navigable waters)  
US Environmental Protection Agency: 734-676-6500 (spill to navigable waters)  
Detroit Water & Sewerage Department - System Control Center: 313-267-6000 (spill to sewer)  
Wayne Co. Dept. of Public Health: 734-727-7000 or 734-727-7284 (after hours)  
Michigan DNRE SE District Office: 586-753-3700  
Michigan DNRE Facility Inspector (Jim Day): 586-753-3835  
MI Occupational Safety & Health Division: 517-322-1831  
Poison Control Center: 800-222-1222

### CORPORATE COMMUNICATIONS MANAGER:

Dave Crumrine  
734-521-8032 (office)  
734-845-8410 (cell)

### FIRE, POLICE, SHERIFF:

City of Romulus Fire Department: 911 or 734-941-8585  
City of Romulus Police Department: 911 or 734-941-8400  
Michigan State Police: 911 or 313-256-9636  
Wayne County Sheriff Department: 911 or 313-224-2222

### OTHER CONTACTS:

CSX Railroad Trainmaster In Charge: 734-260-5449

### ELECTRIC, GAS, & WATER UTILITIES:

DTE Energy: 800-477-4747  
Consumers Energy: 800-477-5050  
City of Romulus DPW (water mains & hydrants) 734-942-7579  
Buckeye Pipeline Co. (petroleum pipeline) 800-437-3497





**Attachment A7.6:**

**Procedure for Off-Site Risk Assessment During and After an Unplanned Release  
(EQRR SOP: QES-OP-950-ROM)**



**EQ - THE ENVIRONMENTAL QUALITY COMPANY**

***STANDARD OPERATING PROCEDURE***

---

Document Number:	QES-OP-950-ROM	Issue Date:	3-26-10
Author:	D. Belisle	Revision Date:	5-28-10
Job Title:	QEHS Manager	Department:	QEHS

---

**TITLE:           PROCEDURE FOR ASSESSING OFF-SITE RISK DURING AND AFTER A  
SIGNIFICANT UNPLANNED RELEASE**

**PURPOSE:** To provide EQ Resource Recovery, Inc. (EQRR) staff with a uniform procedure to obtain information that is needed to provide a timely assessment of the off-site risk associated with a significant fire and/or explosion incident, or other similar release of environmental contaminants and/or hazardous substances to the off-site environment. The information obtained by this procedure may ultimately be incorporated into a written Risk Assessment Screening Report that addresses the potential short-term and long-term health effects associated with known contaminants released during such an event.

**SCOPE:** This procedure applies in the event of a significant fire and/or explosion incident or other release of environmental contaminants and/or hazardous substances to the off-site environment.

**RESPONSIBILITIES:** Many of the actions incorporated into this procedure are to be performed by EQRR personnel to the extent possible. However, much of the off-site sampling and monitoring will, in all likelihood, have to be performed by a duly authorized governmental agency (e.g., the Michigan Department of Natural Resources and Environment (“DNRE”)) as such activities can present legal barriers to EQRR.

**PROCEDURE:** The actions below are not necessarily listed in the order in which they should occur. Containing the release and preventing harmful exposures are the first priorities.

**RESPONSIBILITY**

**ACTION**

**1.0 Record Incident Parameters**

EQRR As soon as access is available to employees/witnesses

- 1.1 Document the time the incident began and the duration of the overall event. Identify the specific location(s) where the incident began.
- 1.2 Identify employees/witnesses having direct involvement or direct knowledge of the incident.
- 1.3 Identify any relevant witnesses to the event.
- 1.4 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.

**2.0 Develop Event Narrative**

EQRR As soon as access is available to employees/witnesses

- 2.1 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 other tools and resources, as available (automated data records, surveillance cameras, etc.).
- 2.2 Identify specific event locations, materials, and equipment involved in the incident.
- 2.3 Identify and characterize, to the extent possible, the size and scope of the event.

**3.0 Develop a Comprehensive List of Materials or Substances Involved**

Regulatory and health agencies and hazardous materials (hazmat) response teams, in conjunction with EQRR As soon as possible

- 3.1 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.
- 3.2 Determine the volume, concentration, and weight of substances identified above and determine how they

## **RESPONSIBILITY**

## **ACTION**

may have been altered by the event (e.g., pyrolysis products, decomposition, degradation, and known mixture reactions). Based on this information, begin developing a list of compounds of potential concern.

- 3.3 Identify the primary location where materials used to make the previous determinations will be housed and ensure that information critical to response and activity is kept in that location.

### **4.0 Air Monitoring During Incident**

Federal (U.S. Environmental Protection Agency [EPA], NOAA) and local hazmat response teams, in conjunction with EQRR (to the extent practicable) As soon as can be mobilized

- 4.1 Federal and state agencies may model the dispersion and deposition 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. EQRR will assist in these activities to the extent practicable and if requested.
- 4.2 Federal and state agencies may establish air monitoring equipment in locations upwind and downwind of the incident. It is anticipated that locations will be assigned as soon as possible, using visual/meteorological data and update, as needed, with modeling results and that monitoring should continue until downwind data is consistent with upwind values. EQRR will assist in these activities to the extent practicable and if requested.
- 4.3 Federal and state agencies may establish air monitoring methods and parameters, including as many of the identified substances as possible. It is anticipated that federal and/or local hazmat response teams will use the one or more of the following monitoring methods and/or equipment: (i) continuous particulate matter less than 2.5 microns in diameter for fire/explosion events; and (ii) SUMMA canisters/Tedlar bags for volatile organic compounds released from ruptured tanks. EQRR will assist in these activities to the extent practicable and if requested; however, EQRR does not maintain such monitoring equipment at the facility.

### **5.0 Post-Incident Sample Collection**

EPA, DNRE, or DCH  
During and/or immediately following the incident

- 5.1 Federal, state and local agencies may 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,

**RESPONSIBILITY**

**ACTION**

or air modeling. A statistical sampling design may not be necessary for the screening evaluation. Post event off-site sampling may not be necessary based on air monitoring data and lack of off-site migration or deposition. EQRR will assist in the development of such plan to the extent practicable and if requested.

- 5.2 Federal and state agencies may collect samples to identify and characterize concentrations of substances involved in the incident. Include sampling for background concentrations. EQRR will assist in the collection of samples to the extent practicable and if requested; however, as noted previously, it is anticipated that EQRR will not have access to sample locations on off-site properties.
- 5.3 Federal and state agencies may analyze the collected samples and review the results by comparison to relevant screening levels. It is anticipated that screening levels may have to be developed by federal or state agencies for some chemicals or environmental media. EQRR will assist in the analysis and review to the extent practicable and if requested.
- 5.4 Federal and state agencies may identify and document substances found to be present in levels that exceed screening levels. EQRR will cooperate with these agencies in this effort if requested.

**6.0 Evaluate Data for Screening Potential Risk Yes/No (determines next step)**

EPA, DNRE, or DCH  
As soon as possible

- 6.1 Federal and state agencies and/or EQRR (if samples are collected by EQRR) will screen the collected data against relevant screening levels.
- 6.2 Federal and state agencies and or EQRR (if samples are collected by EQRR) will prepare a risk Assessment Screening Report.
- 6.3 EQRR will cooperate with these agencies in the screening and report preparation if requested.

**7.0 Corrective Action**

EQRR

- 7.1 Based upon results of the foregoing data collection and analyses, EQRR will perform corrective actions in accordance with Part VI of its Part 111 hazardous waste management facility operating license.

---

**DEFINITIONS:**

---

**REFERENCES:**

Michigan Part 111 Administrative Rules  
Michigan Part 201 Environmental Remediation

**ASSOCIATED DOCUMENTS:**

Waste Characterization Reports  
Material Safety Data Sheets  
Inventory Records  
Container/Tank Records

**RECORDS:**

Records created by EQ Resource Recovery, Inc. during the enactment of this procedure will be placed in the facility's operating record and will be held for at minimum the life of the facility.