SECTION G

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

R 299.9607 and 40 CFR, Part 270.14(b)(7), Part 264.50 through 264.56

CONTINGENCY PLAN AND EMERGENCY PROCEDURES
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G-1 Purpose of the Contingency Plan
(R299.9607, CFR 264.51 and 264.53)

The Contingency Plan outlines the course of action to be followed in the event of an incident involving hazardous waste or hazardous waste constituents that could threaten human health and/or the environment at EQD. 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 EQD facility in Detroit, Mi, 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 constituents which could threaten human health or the environment.

Copies of this Contingency Plan have been provided to emergency response agencies such as the local police and fire departments, hospitals, contractors, State and Local emergency response teams. The intent of sending each agency a copy of the Plan is 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. Each person or the chief officer of each department, agency, or organization which received a copy of the Contingency Plan were asked to assist EQD, as necessary, during an emergency.

Each of the agencies noted above has been contacted and sent copies of the Contingency Plan and requested to provide the services described below in the event of an actual emergency. **Appendix G-1** provides copies of these requests to the mentioned agencies.

The City of Detroit Police Department has been asked to provide the following assistance during an emergency:

a. Primary emergency authority;
b. Immediate response;
c. Emergency transport services;
d. Crowd control assistance;
e. Communications support;
f. Security to affected area; and
g. Evacuation of surrounding areas, if required.

The City of Detroit Fire Department has been sent a copy of this Plan and has been asked to provide the following assistance during an emergency:

a. Primary emergency authority;

b. Immediate response;

c. Primary fire fighting services;

d. Rescue and emergency transport services; and

e. Communications support.

The Detroit Emergency Medical Services has been sent a copy of this Contingency Plan and has been asked to provide the following assistance during an emergency:

a. Primary medical services; and

b. Rescue and emergency transport services.

The Michigan Department of Environmental Quality (MDEQ) has been sent a copy of this Contingency Plan and has been asked to provide the following assistance during an emergency;

a. Technical support; and

b. Communications support.

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

G-2 Description of Facility Operations

EQD is a hazardous and non-hazardous waste treatment facility located in Detroit, Michigan. The facility accepts wastes which are permitted and regulated by the MDEQ and the United States Environmental Protection Agency (USEPA). EQD's Operating License is EPA Identification (ID) Number (No.) MID 980 991 566.

The facility is under surveillance 24 hours per day, seven days per week and employs approximately 80 personnel. Security guards are employed 24 hours per day including weekends and holidays. EQD restricts facility access to employees, visitors and delivery carriers. All visitors are required to register at the Security office and be accompanied by authorized personnel while on the premises. Delivery carriers are under the supervision of operating personnel while engaged in activities at the facility.

Security personnel conduct regular security checks and the results are recorded within EQD's facility Operational Record. Security and staff will immediately notify the Emergency Coordinator/Alternate upon discovery of a fire or leak, advising of cause, location, flow, and type. Treatment plant staff are to take available operations measures consistent with the company safety policy, to mitigate the spill/leak or fire, if possible.

G-2a Waste Identification and Characterization

EQD accepts all characteristic and listed wastes pursuant to 40 CFR 261, Subparts C and D, respectively, and Part 111 of Michigan Natural Resources and Environmental Protection Act, 1994 PA 451 (Act 451) except those wastes listed below.

Per EQD's license, the following waste contaminants are NOT ACCEPTABLE at the facility:

EQD will not accept radioactive, explosive, or biologically active wastes for treatment. Similarly, no waste regulated under the federal Toxic Substances Control Act (TSCA) will be accepted for treatment at the facility. However, non-regulated TSCA waste will be accepted for non-destructive treatments.

Non-regulated TSCA waste are those wastes that contains less than 50 parts per million (ppm), polychlorinated biphenyls (PCBs). Non-destructive methods to treat PCB containing wastes may include stabilization or physical/chemical precipitation and removal. No incineration will be performed to destroy non-regulated PCB wastes.

The following is a brief description of wastes that will be received at the EQD facility:

G-2a (i) Listed Hazardous Wastes

EQD accepts all wastes listed in Subpart D (Lists of Hazardous Wastes) of 40 CFR 261 and wastes listed in the MDEQ Act 451 R 299.9223 and R 299.9226. Hazardous wastes from both non-specific and specific sources will be accepted at the facility. Hazardous waste codes accepted at the facility are presented in **Table C-4.**

Due to the nature of EQD's operations a variety of hazardous and non-hazardous materials/chemicals and waste are used and/or treated. With respect to this**, Table G-1,** Maintenance Supply and Treatment Materials and **Table G-2,** Waste Characteristics have been assembled to provide information regarding the types of hazards posed by the various categories of materials/chemicals and wastes treated at the facility. This information is general, and as such, the expertise of technically trained personnel will be relied upon for more detailed information in routine operations or emergency situations.

EQD utilizes known maintenance, supply and treatment chemicals. There are certain maintenance procedures at the site that involve the use of various paints, primers and petroleum products. In addition, the laboratory utilizes limited quantities of organic solvents, alcohols, and compressed gasses during analytical testing. These materials can be considered hazardous by definition and by their nature.

G-2a (ii) Characteristic Hazardous Waste

Pursuant to 40 CFR 261, Subpart C, a solid waste is a hazardous waste if it exhibits any of the following characteristics:

- Characteristic of Ignitability (40 CFR 261.21)
- Characteristic of Corrosivity (40 CFR 261.22)
- Characteristic of Reactivity (40 CFR 261.23) EQD does not accept explosive wastes
- Toxicity Characteristics (40 CFR 261.24)

EQD will accept the hazardous waste exhibiting the above referenced characteristics and Michigan Act 451 Rule 299.9217, 200.9218 and 299.9219.

Furthermore, appropriate sampling and testing methods as specified in Appendices I, II and III to Part 261 of 40 CFR will be used to classify hazardous wastes.

G-2b Facility Work Areas and Routine Operations

The EQD Waste Treatment Plant operations include receiving, storage and treatment of hazardous wastes.

The specific routine operations and work areas include:

- Waste receiving and quality control
- Waste loading and unloading
- Reagent unloading and tank storage
- Waste storage in tanks
- Waste treatment in tanks
- Waste bulking and consolidation;
- Container staging and storage, and
- Shipment of wastes off-site to permitted treatment, storage and disposal facilities.

The waste processing operations occur in the following primary structures: the Main Treatment Building, the Process Building, the North Drum Staging/Storage area, the North Drum Storage Area and the Chemical Fixation Building. **Table B-3** identifies hazardous waste management units at the facility, their status, process and capacities.

The following are descriptions of the operations performed in these areas:

The Main Treatment Building is located in the center of the site and houses the physical-chemical treatment system. This area contains supplies, such as drums and chemicals. There are treatment tanks, storage tanks, and raw materials tanks in this area. The Main Treatment Building accepts and processes hazardous and non-hazardous wastewater containing heavy metals, pressable sludges and oily wastes. Also located within the southeast portion of the Main Treatment Building is the Corrosive (Acid/Base) Treatment Area/Drum Storage Area. EQD Laboratory Services is located along the south side of the Main Treatment Building. This area uses and stores a wide variety of lab chemicals as well as compressed nitrogen, oxygen, argon, and helium gas cylinders. A maintenance area with three service bays is located on the east side of the Main Treatment Building. This operation uses and stores lubricating greases and oils, and other various automotive fluids.

The Process Building located north of the Main Treatment Building, houses the oily waste processing tanks.

Containerized waste streams arriving for processing and destined for the EQD facility will arrive at the EQD Container Staging Area. In this area, containers are off-loaded and appropriate representative samples are collected. The containers can then be transferred to the North Drum Storage Area. Those containers which are destined for EQD and meet waste acceptance criteria are stored in the EQD North Drum Staging/Storage Area.

The Container Storage Building is located in the North Central section of the facility, connected to the Chemical Fixation Building and adjacent to the North Drum Staging/Storage Area drum pad. The building houses 1,826 drums.

The Chemical Fixation facility is located North of the Main Treatment Building. The facility operations are housed within a pre-engineered metal structure that is attached to treatment/storage tanks/vaults. The active portions (i.e. vaults, pugmill) are fully enclosed within the building.

EQD's Chemical Fixation Building utilizes a waste treatment technique commonly referred to as a pozzolanic stabilization. This technique relies on materials rich in stabilization and fixation agents to provide a solid stabilized mass when mixed with wastes. The most commonly utilized materials in EQD's process are soluble silicates, lime, cement kiln dust (CKD), fly ash and Portland Cement.

EQD receives waste in a variety of container sizes, such as, small glass or plastic bottles, pails, drums, totes, boxes and cubic yard sacks. EQD may elect to consolidate these containers as a means to more efficiently manage these wastes for further processing or in preparation for shipment to a permitted off-site treatment/disposal facility. Bulking/Consolidation may include the transfer of the smaller containers (e.g. one-gallon jugs) into larger containers, such as drums or totes. Drums may be pumped using vacuum trucks/tankers. Solid wastes in cubic yard sacks may be dumped into roll-off/dump trailers for processing or shipment to and off-site treatment/disposal facility.

Sheet A-2, EQD Facility Drawing shows the location of all buildings and waste management units.

G-3 Identification of Potential Situations

(R 299.9607, 40 CFR 264.52(a), 264.56(d))

Potential accidents are classified into three general areas:

1. Fire and/or explosion involving hazardous waste or hazardous waste constituents.
2. Accidental release of waste from hazardous waste or hazardous waste constituents.
3. Accidental release in the form of a vapor of hazardous waste or hazardous waste constituents.

G4 Emergency Coordinators

(R299.9607, 40 CFR 264.52, 264.55)

G-4a Identification of Primary and Alternate Emergency Coordinators

(R299.9607, 40 CFR 264.52, 265.55)

If an imminent or actual emergency is discovered at the EQD facility, the Emergency Coordinator will be immediately notified. The primary Emergency Coordinator will be contacted first; if he/she is not available, the Alternates will be contacted (in the order listed) until one is reached. The primary Emergency Coordinator and the Alternates are listed on **Figure G-1**.

G-4b Qualifications of the Emergency Coordinators

(R299.9607, 40 CFR 264.55)

The Emergency Coordinator is thoroughly familiar with all aspects of the Contingency Plan, all operations and activities at the facility, the location and characteristics of wastes handled, the locations of all records within the facility, and the facility layout.

G-4c Authority to Commit Resources

(R299.9607, 40 CFR 264.55)

The Emergency Coordinator has the authority to commit the resources necessary to implement the Contingency Plan. The Emergency Coordinator coordinates and directs all internal response efforts and personnel.

G-5 Implementation of the Contingency Plan

(R299.9607, 40 CFR 264.51 and 264.56)

The RCRA Contingency Plan is a part of the overall effort at EQD to predict, prevent and properly respond to sudden and non-sudden incidents at the facility. The Plan satisfies RCRA requirements for responses to emergencies involving hazardous wastes.

The provisions of this Contingency Plan must be carried out immediately whenever there is an imminent or actual accident, such as fire, explosion or release of hazardous waste or hazardous waste constituents which could adversely threaten human health and/or the environment

Minor leaks or spills in the hazardous waste container or tank storage areas would not normally trigger the implementation of the Contingency Plan, but would be managed by the Emergency Coordinator or his/her alternate. This Section of the Contingency Plan offers the Emergency Coordinator/Alternate guidelines to evaluate the need to implement the Plan.

The Contingency Plan will be implemented in the following situations:

G-5a Fire and/or Explosion

- causes the release of uncontrolled toxic fumes.
- spreads and ignites materials at other locations on-site or results in heat-induced explosions.
- spreads to off-site areas.
- spreads contamination from the use of water or water and chemical fire suppressants external to the facility.
- occurs or an imminent danger exists that an explosion could occur at the facility.

G-5a(i) Large Scale Fire Department Response Procedures

The EQD fire suppression system is designed to provide immediate water and/or foam deluge in response to heat in the plant treatment, bulking and storage areas. The alarm automatically alerts Security if the fire suppression system has been activated. The fire suppression system can also be activated manually via pull stations. See **Section F-1d** for details on the fire suppression system automatic activation and alarm system. If a fire/explosion has been determined to be too large to extinguish quickly and with minimal exposure risk to personnel or if a smaller scale fire cannot be extinguished, EQD employees shall:

1. Commence emergency notification (intercom).
2. Notify the Emergency Coordinator/Alternate via Internal Communication System (see **Subsection G-6a**).
3. The Emergency Coordinator/Alternate will call the appropriate response agencies, such as the Detroit Fire Department, from nearest accessible phone at the facility or the office. Emergency phone numbers will be posted within each building that has telephone connections.
4. All personnel will secure their operations upon receiving the signal to evacuate, if it can be done with minimal risk.
5. All personnel except those designated by the Emergency Coordinator/Alternate, shall evacuate buildings upon sounding of alarms, via nearest exit. Refer to **Sheet R-1** for evacuation routes.
6. Depending on the potential for explosion or release of toxic gases, off-site evacuation may be initiated in accordance with **Subsection G-6a**, Evacuation Plan.
7. The Emergency Coordinator shall determine the most accessible and safest route of approach to the fire. Consider flame migration potential, associated dangers and physical limitations. Attempt to determine the nature of burning material by utilizing records of tanks and container contents.

8. EQD employees shall not enter smoke-filled environments where fire-protective clothing and/or breathing apparatus are required. Any search and rescue operations shall be conducted by the fire department.
9. When the fire department arrives, the Emergency Coordinator/Alternate will delegate primary responsibility to them, stand-by to provide assistance; and not interfere with the fire department operations.
10. When the fire is extinguished, remedy point source to stop flow if possible with minimal risk to personnel and environment.
11. Dike spilled material and fire run-off water with standard industrial absorbent.
12. Absorb spilled material or dump to emergency tank or empty containers as directed by the Emergency Coordinator. Use non-sparking shovels to apply standard industrial absorbent over affected area.
13. Collect contaminated material (e.g., absorbent, dry chemical, rags, etc.) in recovery drums.
14. Decontaminate boots, gloves, goggles, face shields, self-contained breathing apparatus and other reusable emergency response equipment. If PPE cannot be contaminated, it must be collected and properly disposed of.
15. Clean, restore or replace emergency response equipment, and return it to its original location before resuming operations.
16. Label recovery drums in accordance with all applicable hazardous waste rules and regulations, if waste is determined to be hazardous.
17. Observe proper hygiene procedures during personal decontamination.

G-5a (ii) Small Scale/Incipient Fire Handling Procedures

A small scale incipient fire is a fire in its beginning stage that can be controlled with portable fire extinguishers and small hoses systems. When EQD personnel determine that a small scale or incipient fire can be promptly extinguished with minimal risk to health or environment, the following procedures will be enacted:

1. Notify the Emergency Coordinator/Alternate and adjacent employees, either in person or by utilizing Internal Communication System as presented in **Subsection G-6a**.
2. Attempt to suppress the smoldering or flaming material using appropriate extinguisher. The locations of fire extinguishers are marked using high visibility signs and noted on **Sheet R-1**.
3. Eliminate and continue to restrict all potential sources of ignition to minimize the risk of additional fires.

4. Maintain an awareness of other containers of material in areas near the incident and water spray, relocate or barricade them to prevent contact with elevated temperature.
5. Appropriate personal protective equipment is to be worn to cleanup the impacted area; the procedures to be followed will be those described within **Subsection G-5b (ii).**
6. If unable to immediately extinguish flames, sound the closest available alarm, leave area and follow procedures shown in **Subsection G-6d**.

G-5b Spill or Material Release

- results in release of uncontrolled toxic liquids or vapors, thus causing a fire or gas explosion hazard or health hazard.
- results in soil and/or groundwater contamination.

This plan has been developed and organized in such a way as to afford maximum guidance during an incident of any magnitude and to minimize the risk of any of the above accident on human health and/or the environment. The Emergency Coordinator/Alternate and other personnel are trained on the contents and implementation of the components of this document and will follow prescribed procedures in the event of an actual emergency. Records of this training program are maintained by the EQD Environmental Health and Safety Manager.

Should an emergency arise, the Emergency Coordinator or his/her Alternate will be notified immediately. Subsequently, necessary facility personnel will be notified when required. Local communities and emergency response personnel, such as police and fire departments, hospitals, and governmental agencies, which are familiar with internal operations, material types and emergency response procedures at the EQD facility will be notified pursuant to existing agreements if their assistance is required (See **Section G-1)**.

G-5b(i) Large Scale Spill Emergency Response Procedures

In the event of a spill, leak or release of material too large to be managed by the facility personnel, and if it is perceived that the spill cannot be stopped without risk to human health and/or environment, seek assistance and proceed to address the spill as follows:

1. Contact the local Fire Department and other relevant emergency responders.
2. Determine the source of the leak or spill. Where possible, immediately identify the characteristics, exact source, amount and area affected by the release. Classify the waste by observation of labels, examination of waste storage records or manifests, and/or knowledge of waste storage practices.
3. Notify the Emergency Coordinator / Alternate using the Internal Communication System as described in **Subsection G-6a**.

4. The Emergency Coordinator/Alternate will minimize and continue to restrict all activities/operations from the spill area and areas potentially impacted by the release, such as those downwind and downgrade.
5. The Emergency Coordinator / Alternate will determine whether any other operations at the facility are effected by the spill and order the securing of those operations, if necessary. The Emergency Coordinator / Alternate will monitor operations after shutdown for leaks, pressure build-up, gas generation or other problems, as appropriate.
6. Evacuation Assessment: The Emergency Coordinator / Alternate will assess possible hazards to human health and the environment by considering both direct and indirect effects of released material, in order to determine if evacuation of facility personnel or surrounding areas will be necessary (refer to **Subsection G-6d)**.
7. Contractor Assessment: The Emergency Coordinator / Alternate will assess the size and rate of growth of the spill to determine whether the spill can be managed by facility personnel. If the spill cannot be handled, outside assistance will be summoned pursuant to existing agreements for such incidents.

G-5b (ii) Small Scale Spill General Response Procedures

In the event of a spill or a leak that has been determined to be of smaller magnitude and can safely be handled by the facility personnel, the following procedures will be observed:

1. Notify the Emergency Coordinator / Alternate and adjacent employees by utilizing the Internal Communication Systems as described in **Subsection G-6a**.
2. Prior to responding, personnel will observe the “buddy system” and don appropriate boots, aprons or protective suits, gloves, face shields, goggles, and respiratory protection, as necessary. **Table G-3** is submitted as an example of the EQD Emergency Equipment List; the list may be updated as new equipment is added. The type of respirator selected (i.e., appropriate cartridge or self-contained breathing apparatus) will be determined based on the type of material involved in the incident and be authorized by the Emergency Coordinator / Alternate prior to use.
3. Position ABC fire extinguisher near immediate cleanup area, when necessary.
4. Remedy and stop the point source by closing valves or by using compression plugs, blocking, bonding or patching materials. If possible, use large-sized containers to overpack leaking sources.

5. Dike spill with standard industrial absorbent as appropriate, keeping in mind the compatibility of the absorbent with the materials spilled.
6. Once flow is stopped, absorb spilled material from pavement with standard industrial absorbent, or pump to an available tank designated by the Emergency Coordinator. Use a non-sparking shovel to uniformly disperse absorbent over affected area.
7. Collect contaminated material (e.g., absorbent, rags, etc.) for proper disposal.
8. As appropriate, decontaminate all personal protective equipment (PPE) prior to re-use. If PPE cannot be decontaminated, it must be collected and properly disposed of.
9. Decontaminate, restore or replace spill response equipment, and return it to its original locations before resuming operations.
10. Label recovery drums in accordance with all applicable hazardous waste rules and regulations.
11. Observe proper hygiene procedures during personal decontamination.
12. Investigate for leaks, pressure build-up, ruptures in piping and other equipment prior to resuming operations.

G-5b (iii) Limited Spills Within Loading/Unloading Area

In response to spills discovered within waste materials loading or unloading areas, the following procedures shall commence:

1. Stop the source of the leak immediately if it can be done without risk to health. This may involve closing the truck or tank car valve, righting a container, etc., but only if it can be done safely and with minimal risk.
2. Immediately notify Emergency Coordinator/Alternate for determination of what precautions, equipment and procedures are necessary. He/she will prescribe appropriate PPE to be used.
3. Use appropriate PPE and follow procedures for small-scale response, as outlined in **Subsection G-5b (ii)**. Determine whether or not the spill will remain within the spill control area. Immediately ensure that containment is effective. Use compatible absorbent material to contain spill, if necessary.
4. Consult the Emergency Coordinator/Alternate to determine which tanks are available and compatible with spilled materials and, if necessary, transfer material to designated tanks.

G-5b (iv) Spills Due to Ruptured Tanks and Containers

Any hazardous waste and/or materials spill due to ruptures or leaks within tanks, containers or piping shall prompt EQD staff to perform the following:

1. Immediately notify the Emergency Coordinator/Alternate. Ruptured tanks or containers will normally release large amounts of material and should not be handled without assistance.
2. The Emergency Coordinator/Alternate will determine the material released, amount, and area affected by the release. Waste can be classified by observation of labels, examination of waste storage records or manifests or knowledge of waste storage practices.
3. The Emergency Coordinator/Alternate will determine if the release can be controlled by EQD personnel. When this determination has been made, responders shall follow the small-scale response procedures in **Subsection G-5b (ii**).
4. Eliminate and continue to restrict all activities/operations from the spill area, and areas downwind, downgrade of the spill area.
5. The Emergency Coordinator/Alternate will order the shutdown of any operations effected by the spill. Operators will take the necessary steps to completely secure their operations. The Emergency Coordinator/Alternate will monitor operations after securing for leaks, pressure build-up, gas generation, or other problems as appropriate.
6. Evacuation Assessment: The Emergency Coordinator/Alternate will assess possible hazards to human health and the environment by considering both direct and indirect effects of released material in order to determine if evacuation of facility personnel or surrounding areas will be necessary. (See **Subsection G-6d**)
7. Contractor Assessment: the Emergency Coordinator/Alternate will assess the size and rate of growth of the spill to determine whether the spill can be managed by facility personnel. If the spill cannot be handled, outside assistance will be summoned pursuant to existing agreements for such incidents.

G-6 Emergency Procedures

(R299.9607, 40CFR 264.51, 264.52 and 264.56)

Emergency procedures are the responsibility of the Emergency Coordinator/alternate. Such procedures are specifically outlined and described herein. In the event of an imminent or actual emergency, the specific procedures outlined below will be followed.

G-6a Immediate Notification Procedures for Facility Personnel and State and Local Agencies with Designated Response Roles

(R299.9607, 40 CFR 264.51264.52(a), 264.56 and 264.56)

In the event of an emergency, the Emergency Coordinator or his/her Alternate will be contacted immediately.

In an imminent or actual emergency, involving sudden or non-sudden release, fire, explosion or otherwise, so as to threaten human health and/or the environment, the Emergency Coordinator/Alternate will immediately warn facility personnel and appropriate emergency response authorities. The procedures listed below with regards to appropriate notification of the proper authorities shall be followed as soon as possible once the safety of personnel is assured.

Notification of facility personnel will be done using the following internal communications system.

1. EQD is equipped with a telephone public address and internal automatic and manual fire/emergency evacuation alarm systems that are operational 24 hrs. per day. The telephone system with intercom and paging capability is available at the loading/unloading area, chemical storage area, the treatment areas, the Process building, AST Farm, the laboratory and guardhouse. These telephones allow one-on-one communication and can be used to activate the paging system which can provide vocal instructions to all EQD personnel. In addition, the facility maintains rechargeable two-way radios and cell phones to assist emergency situation communications.
2. The emergency alarm system is designed for internal notifications. Phone notification centers are provided at numerous locations at the facility as described above. Employees are trained and have knowledge as to the location and operation of this system.

If the Emergency Coordinator determines the facility has had an incident which could threaten human health and/or the environment, or for which EQD has knowledge that a spill has reached surface water or groundwater, he/she shall immediately notify appropriate national, State, and/or local departments, agencies and organizations with designated response roles. The following procedure will be used for notification of state and local agencies with designated response roles.

1. Cell phones will serve as the primary means of communicating with the external emergency response units such as the fire departments, police department, etc. Alternatively, the internal telephones system can be used for this purpose. An emergency contact phone list is posted in each department. See **Figure G-1** for a copy of this telephone list.
2. Notify appropriate national, State, and /or local departments, agencies and organizations with designated response roles. Emergency contact phone numbers for National, State and local agencies are found in **Figure G-1**.
3. When notifying response teams, the Emergency Coordinator should be prepared to furnish the following information:
    a. Name, address and telephone number of the owner and the incident reporter;

b. Name, address, telephone number and EPA Identification Number of the facility;

c. Time, location and type of incident (e.g., spill, fire, release, etc.);

d. Name and quantity of material(s) involved and the extent of the release;

e. The extent of injuries, if any;

f. The possible hazards to human health and/or the environment outside of the facility; and

g. The immediate response action taken.

G6b Procedures to be used for Identification of Release

[R299.9607, 40 CFR 264.51, 264.52 and 264.56]

In the event of an incident, the Emergency Coordinator/Alternate must immediately identify the character, exact source, amount and extent of any released materials. This may be accomplished by observation or review of facility records or manifests, and, if necessary, by chemical analysis.

G-6c Procedures to be used to Assess Potential Hazards to Human Health and the Environment

[R299.9607, 40 CFR 264.51, and 264.56]

The Emergency Coordinator/Alternate must assess possible hazards to human health and/or the environment that may result from a release, fire or explosion. This assessment shall consider both direct and indirect effects of the release, including the effects of any toxic, irritating or asphyxiating gases that are generated. And the effects of any hazardous surface water runoff from water or chemical agents used to control fire and heat-induced explosions.

The procedure for assessing possible hazards includes:

1. Identification of hazardous properties of the materials involved or by-products thereof;
2. Determination of threat to human health and/or the environment, both on-site and off-site;
3. Assessment of any environmental conditions (e.g., wind speed and direction) that may contribute to the seriousness of the hazards; and
4. Determination of the readiness and availability of response equipment, both on-site and off-site.

G-6d Procedures to Determine if Evacuation is Necessary

[R299.9607, 40 CFR 264.51, 264.52 and 264.56]

Whenever the Emergency Coordinator/Alternate determines that evacuation of local areas may be advisable, immediate notification of appropriate local authorities must

occur. The Emergency Coordinator/Alternate must be available to help appropriate officials decide whether local areas should be evacuated. The EQD Evacuation Plan is outlined below.

The objective of the Evacuation Plan is to minimize impact to employees and visitors from imminent or potential hazards associated with a spill/leak or fire. If an emergency occurs to which plant personnel cannot adequately respond, the Emergency Coordinator/Alternate will signal Employees by way of the facility public address system to evacuate the facility, or, at a minimum, the affected area. If the evacuation of outlying areas is deemed necessary, the Emergency Coordinator/Alternate will advise the local police and fire departments, the MDEQ and the National Response Center (NRC) of the potential threat to human health and/or the environment.

The Evacuation Plan implementation requires prompt and deliberate action. The plan of action described in this Section will be strictly adhered to unless, in the opinion of the on-scene Emergency Coordinator/Alternate, minor modifications during an actual emergency would constitute a more efficient evacuation. The evacuation routes and assembly locations (rally points) as shown on **Sheet R-1** will be posted at key locations throughout the EQD facility.

G-6d (i) Facility Evacuation Procedures

The EQD facility public address intercom system will be used to signal partial or total facility evacuation. This message will include a warning of the nature of the incident. In the event of a total facility evacuation, the City of Detroit Police and Fire Departments will be immediately notified.

The Emergency Coordinator/Alternate will make the decision whether or not to evacuate. This decision will be based on experience and the criteria identified below:

1. Nature and toxicity of materials involved;
2. Prevailing wind direction
3. Possibility of an explosion or spreading fire; and
4. Possibility of a release of toxic vapors, mists, or dusts.

The Emergency Coordinator/Alternate will direct the evacuation as presented below:

1. The Emergency Coordinator/Alternate will determine whether total facility evacuation is necessary, and direct personnel accordingly;
2. Vehicles will be moved, if possible, so they do not block access/exit gates;
3. Affected employees will immediately secure their operations, if determined safe to do so;
4. All employees, visitors and contractors will leave the affected areas, by routes shown on **Sheet R-1**, unless otherwise directed by the Emergency Coordinator/Alternate;

5. The Emergency Coordinator/Alternate will determine whether total facility evacuation is necessary, and direct personnel accordingly;
6. The Emergency Coordinator/Alternate will ensure that all tank truck valves are closed and/or if tank trucks are to be removed. All container delivery/transport will cease and trucks will be removed, if possible;
7. Employees must not attempt to obtain personal belongings, unless authorized by Emergency Coordinator/Alternate;
8. During the evacuation, the Emergency Coordinator/Alternate, appointed aides, and security personnel will ensure that all unauthorized personnel are kept from entering the evacuated area;
9. The Emergency Coordinator/Alternate will account for all personnel to ensure that no one has been left in the evacuated area;
10. The Emergency Coordinator/Alternate will obtain rescue services for injured people when required; and
11. The employees should not return to the facility until instructed to do so. The Emergency Coordinator or his/her Alternate will make the decision whether it is safe to re-enter the facility.

G-6d (ii) Vicinity Evacuation

If the Emergency Coordinator/Alternate feels than an emergency situation requires the evacuation of areas surrounding EQD, he/she will immediately inform the City of Detroit Police Department, the Fire Department, National Response Center (NRC) and the MDEQ of such a condition. The decision to evacuate surrounding areas is ultimately determined by the above agencies and will be based on the following:

1. Nature and toxicity of materials involved;
2. Prevailing wind direction;
3. Possibility of an explosion or spreading fire;
4. Possibility of a release of toxic vapors, mists, gases or dusts; and
5. The migration potential outside the facility.

If the evacuation of surrounding areas is deemed necessary, the police and fire departments, along with appointed EQD personnel, will apprise all others (industrial, residential, etc.) in the subject area as to the nature of the situation and the advisability to evacuate.

In all cases of vicinity evacuation, all persons so notified will be directed as to the best roads to follow and direction to proceed. This will be determined by the City of Detroit Police Department, Fire Department, NRC and MDEQ.

Whenever the Emergency Coordinator/Alternate determines that evacuation of local areas may be advisable or if EQD has knowledge that the release has reached surface

or groundwater, immediate notification of appropriate local authorities must occur. The Emergency Coordinator/Alternate must be available to help appropriate officials decide whether local areas should be evacuated. In addition, the following agencies must be notified:

1. MDEQ Pollution Emergency Alert System must immediately be notified at (800) 292-4706.
2. The National Response Center (NRC) using the emergency spill response number (800) 424-8802.
3. If release is to sewer systems and has been determined to possibly adversely affect the Great Lakes Water Authority (GLWA) operations, then notify the municipality at (313) 297-9400.

The notifications include the following steps:

a. Name and telephone number of reporter;
b. Name and address of facility;
c. Time, location and type of incident (e.g. release, fire);
d. Name and quantity of materials(s) involved and to what extent;
e. The extent of injuries if any; and
f. The possible hazards to human health or the environment outside of the facility.

G-6e Procedures to be used to ensure that Fires, Explosions, and Releases Do Not Occur, Reoccur, or Spread during the Emergency

(R299.9607, 40 CFR 264.51, 264.52 and 264.56, and 264.227 and 264.200)

During an emergency, the Emergency Coordinator/Alternate must take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur, or spread to other hazardous waste at the facility.

Actions to prevent the recurrence or spread of fires, explosions or releases may include:

a. Halting processes and operations;
b. Collecting and containing released wastes;
c. Prohibiting smoking in all areas except designated smoking areas;
d. Using non-sparking tools;
e. Protecting the area from open flame or heat generating activities; and
f. Monitoring all valves, pipes or equipment for leaks or ruptures.

All reasonable safety procedures will be followed prior to resuming operations.

G-6f Procedures to be used to Monitor Equipment Should Facility Operations Cease

[R299.9607, CFR 40 264.51, 264.52 and 264.56]

If the facility stops operations in response to a fire, explosion or release, the Emergency Coordinator/Alternate must monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, whenever this is appropriate.

G-6g Procedures to Provide Proper Treatment, Storage, and Disposal for Any Released Materials

[R299.9607, 40 CFR 264.51 and 264.56(g)]

Immediately after an incident, the Emergency Coordinator/Alternate will make arrangements for proper storage and/or disposal of all water and contaminated materials resulting from the release, fire or explosion at the facility. All resulting wastes generated will be considered a RCRA hazardous waste and managed as a RCRA waste unless it can be demonstrated to be non-regulated.

G-6h Procedures for Cleanup and Decontamination

[R299.9607, 40 CFR 264.51 and 264.56(h)]

After an emergency event, or as required during the emergency response, all emergency equipment utilized in the affected area will be cleaned or replaced, so that they are suitable for future use. Prior to resuming operations, an inspection of all utilized safety equipment will be conducted. All proper authorities will be notified that the post-emergency equipment maintenance has been performed and operations will resume.

G-6i Procedures for Off-site Corrective Action

In response to an emergency event that impacts an off-site location, the Emergency Coordinator/Alternate will make arrangements to ensure the location is secure by following the requirements in G-5b(i) and/or G-5a(i). Following the event, the location will be assessed for potential clean-up, as necessary, once the emergency situation has ceased. In addition, following the event, all emergency equipment utilized in the affected area will be cleaned or replaced, so that they are suitable for future use. Prior to resuming operations, an inspection of all utilized safety equipment will be conducted. All proper authorities will be notified that the post-emergency equipment maintenance has been performed and operations will resume.

G-7 Notification and Recordkeeping Requirements

[R299.9607, 40 CFR 264.51, 264.52 and 264.56(i) and (j)]

G-7a Procedures to Be Used to Notify State and Federal Officials Prior to Commencement of Operations

[R299.9607, 40 CFR 264.51, 264.52 and 264.56(g)]

Prior to resuming operations, EQD will notify the MDEQ and the EPA that the facility is in compliance.

1. Waste which may be incompatible with the released material is stored or treated until cleanup procedures are completed.
2. Emergency equipment is back in operational order.

Notification must be given to the Director and all the appropriate authorities that the facility has taken the necessary steps to prevent and prepare for future incidents before operations are resumed in the affected area(s) of the facility.

G-7b Recordkeeping Requirements

[R299.9607, 40 CFR 264.51, 264.52 and 264.56(j)]

G-7b (i) Operating Record

In the event of an emergency situation that requires implementation of the contingency plan; the Emergency Coordinator/Alternate will record in EQD's operating record the time, date, and a description of the event.

G-7b (ii) Written Incident Report

After an emergency, the Emergency Coordinator/Alternate will perform the following:

1. As required, an emergency event requiring implementation of the Contingency Plan will be reported in writing to the MDEQ Director and EPA Regional Administrator within fifteen (5) days of the event. This report will, at a minimum, contain:
    a. Name, address and telephone number of the owner or the incident operator;
    b. Name, address and telephone number of the facility;
    c. Date, time, and type of incident (i.e., fire, explosion);
    d. Name and quantity of materials(s) involved and to what extent;
    e. The assessment of actual or potential hazards to human health and/or the environment, where this is applicable;
    f. The extent of injuries, if any; and
    g. Estimated quantity and disposition of recovered material that resulted from the incident.

All EQD reports should be submitted to the appropriate agencies and all applicable information regarding the event that caused implementation of the Contingency Plan will be retained on file in the Operating Record by EQD. EQD will document, in the operating record, all incidents that requires implementation of the Contingency Plan.

G-8 Procedures for Reviewing and Amending the Contingency Plan
[R299.9607, 40 CFR 264.54]

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

1. Applicable regulations or the facility permit is revised;
2. A spill or release occurs and a deficiency is identified in the plan;
3. The plan fails in an emergency;
4. The list of Emergency Coordinators changes;
5. The facility alters its design, construction, operation, maintenance or other circumstances in a way materially increasing the potential for fires, explosions or releases of hazardous waste/or hazardous waste constituents; or
6. The actions/responses necessary to comply in an emergency situation change.

The EQD Contingency Plan will be reviewed every three years. If new, proven technology should be implemented and recertified, an amended plan will be submitted to the appropriate agencies. If, at the three-year review, no new technologies need to be implemented and there are no changes in release potential, a statement to that effect must be prepared, signed by the EQD General Manager and attached to the Plan.

Copies of the Contingency plan shall be maintained at all times at the EQD facility, general and plant offices and in the manned security station at the Kirby Street entrance to the facility. In addition, this Plan is made available to the following agencies: U.S. Environmental Protection Agency (USEPA); Michigan Department of Environmental Quality (MDEQ); City of Great Lakes Water Authority (GLWA); the City of Detroit Fire and Police Departments; and Detroit Emergency Medical Services. **Appendix G-1** contains the specific notification correspondence forwarded to applicable agencies.

All changes in this Plan will be sent to every person, agency, department and organization on the Contingency Plan distribution list within 30 days of the effective date of the change.

Off-site copies will be distributed by certified mail, return receipt requested, with instructions to destroy all previous copies.

G-9 Emergency Equipment
[R299.9607, 40 CFR 264.52(e)]

The type and physical location of the EQD facility's emergency equipment, including fire equipment systems, spill control equipment, decontamination equipment, communications and alarm systems, breathing apparatus and medical treatment facilities is presented in **Sheet R-1**. The location of each piece of equipment and an understanding of its capabilities, has been provided to employees through training sessions. Listing of required emergency equipment and locations are provided in **Table G-3.**

Figure G- 1: Emergency Contact Personnel

And

Emergency Response Agencies/Organizations

Telephone Listing

40 CFR 264.52(c) and (d)

Table G- 1: Maintenance Supply and Treatment Chemicals

Table G- 2: Waste Characteristics

Table G- 3: Location of Emergency Equipment

Appendix G- 1: Notification Correspondence

Drawing 1: A-3 EQD Site Plan

Drawing 2: R-3 Emergency Preparedness Plan