

A.6 Preparedness and Prevention

MICHIGAN DISPOSAL WASTE TREATMENT PLANT (MDWTP)

MID 000 724 831

2017 ATTACHMENT REVISIONS

Replaces Previous Attachment A.6 Preparedness and Prevention

**FORM EQP 5111 ATTACHMENT TEMPLATE A6
PREPAREDNESS AND PREVENTION**

This document is an attachment to the Michigan Department of Environmental Quality's *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 299.9504, R 299.9508, and R 299.9606 and Title 40 of the Code of Federal Regulations (CFR) §§264.30 through 264.37 establish requirements for preparedness for and prevention of releases of hazardous wastes or constituents 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 preparedness for and prevention of releases of hazardous wastes or constituents at the following hazardous waste management facility for the Michigan Disposal Waste Treatment Plant (MDWTP) in Belleville, Michigan.

(Check as appropriate)

Applicant for Operating License for Existing Facility:

- No waiver requested
- Waiver requested for one or more units for required equipment
- Waiver requested for one or more units for required aisle space

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

- No waiver requested
- Waiver requested for one or more units for required equipment
- Waiver requested for one or more units for required aisle space

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INTRODUCTION

Michigan Disposal Waste Treatment Plant (MDWTP) and Wayne Disposal Inc. (WDI) have been designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment in accordance with requirements outlined in R299.9606 and 40 CFR §264.31.

Active hazardous wastes areas may only be accessed by authorized personnel familiar with personal protective equipment requirements. Individuals not authorized to be in the active areas must wear the appropriate personal protective equipment and be escorted by facility personnel.

Buildings and containment areas are constructed of materials that have a decreased combustibility potential and are all designed with sloped secondary containment structures. Containment structure volumes adequately contain 25 year, 24 hour storm and can appropriately manage the permitted storage volumes. Waste received at MDWTP is evaluated utilizing pre-approval and waste screening procedures identified in Attachment A2 Chemical and Physical Waste Analysis Plan in order to minimize the possibility of a fire, explosion or release. Reactivity and ignitable characteristics are identified allowing MDWTP appropriately store and treat the waste.

Unloading operations are completed in well maintained paved areas in order to ensure secure movement of containers. Additionally, MDWTP's drum dock is equipped with a mechanical ramp that allows the forklift to safely remove containers from drum trailers. Tanks are equipped with overflow controls in order to prevent a release.

In order to prevent a potential release to the ground or atmosphere containers remain closed unless waste is being added or removed. MDWTP's air pollution control devices prevent emissions to the atmosphere that may otherwise occur due to processing activities. Processing operations are immediately stopped if equipment failures or power outages may result in a potential release, fire or explosion.

The actions to be taken in an emergency, regardless of cause are outlined in the Site 2 (MDWTP/WDI) facility Contingency Plan.

A6.A REQUIRED EQUIPMENT

[R 299.9606 and 40 CFR §264.32]

MDWTP and WDI have been equipped with the following in accordance with R 299.9606 and 40 CFR §264.32:

1. An internal communications system (i.e. radio, phones) capable of providing immediate emergency instruction (voice) to facility personnel.
2. A landline and mobile telephone systems capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams.
3. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment.
4. Water at adequate volume and pressure to supply water hose streams.

A6.A.1 INTERNAL COMMUNICATION SYSTEM

[R 299.9606 and 40 CFR §264.32(a)]

An internal communications system (radio, phone) capable of providing immediate emergency instruction (voice) to facility personnel is available.

A6.A.2 EMERGENCY RESPONSE COMMUNICATION SYSTEM
[R 299.9606 and 40 CFR §264.32(b)]

Telephone communication systems are available and capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams.

A6.A.3 FIRE, SPILL, AND DECONTAMINATION EQUIPMENT
[R 299.9606 and 40 CFR §264.32(c)]

Fire Extinguishers

Fire extinguishers are present at various locations of the site. Inspections are completed and documented in accordance with MIOSHA inspection requirements found in R 408.10835.

Fire Suppression

The MDWTP fire protection system consists of flame detection systems and fire suppression systems. Flame detectors are present in the North Container Storage Area (NCSA), East Container Storage Area (ECSA), and the East and West Waste Treatment Bays.

The East and West treatment tanks are equipped with a foam based fire suppression system that can be activated automatically and manually. A foam solution is sprayed until the solution is depleted, at which point water is used. The East Bay also has a water-based fire suppression system to protect the area in front of the treatment tanks. Once activated, both systems will continue to flow until they are manually turned off.

The flame detectors and fire suppression system are connected to the local alarm system. Activation of either system triggers a notification to facility personnel and a third party alarm company. Both systems are self-testing, and also provide notification to facility personnel and the alarm company in the event of a malfunction.

Spill Control and Decontamination Equipment

Spill control and decontamination equipment is placed at various locations of the site and are equipped with materials needed for the area, such as heavy equipment to remove solid waste spills and contaminated soil and to construct emergency containment; absorbent for liquid spills; visqueen with weights for blocking storm water catch basins.

A6.A.4 ADEQUATE WATER VOLUME
[R 299.9606 and 40 CFR §264.32(d)]

The municipal water supply provides adequate pressure and volume to operate the site's fire protection systems. Backflow preventers are utilized in order to prevent the contamination of the water supply.

A6.B TESTING AND MAINTENANCE OF EQUIPMENT
[R 299.9606 and 40 CFR §264.33]

Site 2 (MDWTP/WDI's) communications or alarm systems, fire protection equipment and spill control equipment, where required, are tested and maintained as necessary to assure its proper operation in time of emergency.

A6.C ACCESS TO COMMUNICATIONS OR ALARM SYSTEM
[R 299.9606 and 40 CFR §264.34]

A6.C.1 MULTIPLE EMPLOYEES PRESENT
[R 299.9606 and 40 CFR §264.34(a)]

While hazardous waste is being poured, mixed or otherwise processed, all personnel involved have immediate access to emergency communication, either through visual, voice contact, phone, or radio.

A6.C.2 SINGLE EMPLOYEE PRESENT
[R 299.9606 and 40 CFR §264.34(b)]

If only one employee is on the premises while hazardous waste is being poured, mixed or otherwise processed, they will have access to a telephone capable of summoning external emergency assistance and providing notification to internal resources.

A6.D REQUIRED AISLE SPACE
[R 299.9606 and 40 CFR §264.35]

Aisle space will be maintained to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the operation in an emergency.

A6.E STATE AND LOCAL AURTHORITIES
[R 299.9606 and 40 CFR §264.37]

A6.E.1 ARRANGEMENTS WITH STATE AND LOCAL AUTHORITIES
[R 299.9606 and 40 CFR §264.37(a)(1)]

These arrangements are outlined in the Site 2 Contingency Plan.

**A6.E.2 REFUSAL OF STATE OR LOCAL AUTHORITIES TO ENTER INTO EMERGENCY
RESPONSE AGREEMENTS**
[R 299.9606 and 40 CFR §264.37(b)]

Participation letters are mailed to all state and local authorities along with a copy of the Contingency Plan.