FORM EQP 5111 ATTACHMENT A7
CONTINGENCY PLAN

This document is an attachment to the Gage Products Company's (Gage) 2024 RCRA permit renewal application Form EQP 5111. 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 attachment addresses requirements for a contingency plan at the hazardous waste management facility at Gage's Limited Storage Facility (Gage LSF) located in Ferndale, Michigan. Gage LSF performs 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

Sections listed in the table of contents below that are not applicable to the Gage LSF permit renewal are denoted with a strikethrough and the corresponding section has been deleted from the text. This attachment is organized as follows:

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INTRODUCTION

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 Gage's Limited Storage Facility located in Ferndale, 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 below listed entities and records of the submittals are located in Appendix A7-1 of this attachment.

- 1st Choice Urgent Care
- Ferndale Area District Library
- Ferndale Fire Department
- Ferndale Police Department
- Ferndale City Manager
- Great Lakes Water Authority
- Corewell Health William Beaumont University Hospital
- Marine Pollution Control-Emergency Response Plan Contact
- Oakland County Local Emergency Planning Committee – Emergency Management Division
- US Ecology
- Security guard service (LaGarda)

A7.A.2 Description of Facility Operations

The plans and procedures described herein have been prepared in accordance with the applicable regulations and have been designed to minimize hazards to human health and the environment from any unplanned, sudden or non-sudden release of hazardous waste or hazardous-waste constituents to the air, soil or surface water. The procedures established in this plan have been developed to protect Gage employees, properties, and the general public and will be implemented by facility personnel in the event of a potential or actual release of hazardous waste or hazardous waste constituents which may threaten human health or the environment. The contingency plan is a portion of Gage's Spill Prevention Control and Countermeasures/Pollution Incident Prevention Plan (SPCC/PIPP).

Gage is located at 625 Wanda Avenue in Ferndale, Michigan. The facility recycles and stores spent solvent hazardous-waste streams in tanks and in containers within its Limited Storage Facility on Parcel C. These wastes carry the codes authorized for storage in the facility per the application. Gage LSF also stores hazardous wastes, generated on-site, in containers and tanks prior to off-site disposal at designated facilities. The waste types handled are typically ignitable and carry the D001 waste code, along with several others such as F003, F005, D0018 and D0035. In addition, small amounts of corrosive wastes carrying the D002 waste code are also managed. These tanks are located in a segregated concrete diked area adjacent to the Gage LSF's tank farm. Attachment A1, Figure A1-2 contains a general site plan for the Gage LSF, illustrating the Limited Storage Facility building and tank farm on Parcel C. These hazardous wastes are also stored in Limited Storage Facility but are identified and documented differently in the operating record. Section A7.A.3 contains a list of potential situations including fire/explosion, spill to containment and spill during transfers. Section A7.D contains initial response actions to the situations. A copy of the Facility Layout Map has been provided in Attachment A1, Figure A1-2. The Evacuation map has been provided in Figure A7-2-1 of Appendix A7-2.

A7.A.3 Identification of Potential Situations

The Contingency Plan cannot realistically predict all situations that will arise. However, this plan identifies potential situations that could arise, based upon management practices. Actions to be taken in response to these potential situations are addressed in Section A7.D below.

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

A7.B.1 Identification of Primary and Alternate Emergency Coordinators
[R 299.9607 and 40 CFR §§264.52 and 264.55]

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

A7.B.2 Qualifications of the Emergency Coordinators
[R 299.9607 and 40 CFR §264.55]

The primary and alternate Emergency Coordinators are thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of wastes handled at the facility, the location of all records within the facility, and the facility layout. The Emergency Coordinators have complete authority to commit the resources of the company that may be needed to carry out the Contingency Plan.

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

Gage's Limited Storage Facility
625 Wanda Avenue Ferndale, Michigan

Priority	Name	Work Phone	Evening Phone	Cell Phone
Primary Coordinator	**Brenna Harden**	(248) 915-2104	(734) 414-5836	(248) 915-2104
Alternate Coordinator	**Paul Bialy**	(248) 541-3824	(734) 284-0927	(248) 361-8055
Alternate Coordinator	**Phillip Gaietto**	(248) 691-6743		(248) 533-5228
Alternate Coordinator	**Martin Rodriguez (Afternoons)**			(248) 914-2516
Alternate Coordinator	**John Fraser (Afternoons)**	(248) 691-6751		
Alternate Coordinator	**Bruce Grenke**	(248) 691-6754		
Alternate Coordinator	**Matt McCoy**	(248) 691-6745		
Alternate Coordinator	**Byron Allen (Midnights)**	(248) 691-6754	(734) 675-5979	

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

The emergency coordinators are authorized to commit any necessary resources of Gage LSF that may be needed to carry out this Contingency Plan.

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

If an emergency situation develops at the facility, the employee who discovers the incident has been trained to immediately contact an Emergency Coordinator.

The emergency coordinator will 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 will 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. A discussion and list of emergency equipment including alarm systems, internal and external communication systems/equipment has been provided in Appendix A7-3.

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

Fire and/or Explosion

- A fire causes the release of toxic fumes.
- The fire spreads and could possibly ignite materials at other locations on-site or could cause heat-induced explosions.
- The fire could possibly spread to off-site areas.
- The use of water or water and chemical fire suppressant could result in contaminated runoff.
- An explosion has occurred or an imminent danger exists that an explosion could occur, thereby releasing toxic material.

Spill or Release of Hazardous Waste during Unloading Operations

- The spill or release causes bodily injury or is an imminent threat to human health due to the evolution of

reactive or toxic liquids, mist, or fumes or contact with reactive or toxic liquid or spray.
- The spill or release has the potential to, or actually does, overflow the secondary containment structures and exits the facility, either alone or in combination with storm water, potentially resulting in off-site soil contamination or water pollution.
- The spill or release is contained on-site but could cause either groundwater contamination or air pollution.

Spill or Release of Hazardous Waste within the Secondary Containment Structure

- The spill or release causes bodily injury or is an imminent threat to human health due to the evolution of toxic or reactive liquids, fumes, or mist or contact with toxic or reactive liquid or spray.
- The spill or release cannot be immediately transferred to an appropriate tank for container for storage.
- The spill or release threatens the integrity of storage tanks or other facility equipment or structures.

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 Gage LSF 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.

All emergencies require prompt and deliberate action. In the event of any major emergency, an established set of procedures will be followed. These procedures will be followed as closely as possible. In specific emergency situations, however, the Emergency Coordinator may deviate from established procedures to provide a more effective plan for bringing the situation under control.

Gage LSF emergency-response personnel are trained in accordance with OSHA's Hazardous Waste Operations and Emergency Response; Final Rule, 29 CFR 1910.120 and with the applicable sections of 29 CFR Subpart I, Personal Protective Equipment. The facility's evacuation procedures detailing notification and response protocol is provided in Appendix A7-2. The evacuation map has been provided in Figure A7-2-1 of Appendix A7-2 (Evacuation Plan and Routes). The facility's procedure for assessing offsite risk during and after a significant release is provided in Appendix A7-4.

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]

The list of emergency contacts in Table A7.D.1 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. In the event of an imminent or actual emergency situation, the Emergency Coordinator will be notified first. All other facility personnel, local emergency-response agencies, and state and federal authorities will be promptly notified as directed by the Emergency Coordinator.

The emergency coordinator will be responsible for ensuring that all appropriate authorities are notified as necessary.

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 immediately identify the type, exact source, amount, and extent of any released materials. The Emergency Coordinator is familiar with the facility and the types of wastes that are handled. The initial identification will be made by observation of the material involved, the source, and the location of the release. The tanks, piping, and containers are labeled to facilitate the identification of released

materials. If visual identification cannot be made, samples of the released materials will be identified by chemical analysis. See Appendix A7-2 for more detailed notification guidance and release procedures.

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 assessment will consider the effects of any gases that may be generated, the effects of hazardous surface runoff from water or chemical reagents used to control fire, and the effects of any chemical or physical reaction with equipment or structures.

If the Emergency Coordinator's assessment indicates that evacuation of the local areas may be advisable, the appropriate local authorities will be immediately notified. The Emergency Coordinator will assist these authorities in deciding whether evacuation is indicated and what areas may need to be evacuated. The National Response Center (see Table A7.D.1) will also be immediately notified if appropriate, and the following information will be provided:

1. Name and telephone number of reporter.
2. Name and address of facility.
3. Time and type of incident (e.g., release, fire, explosion).
4. Name and quantity of materials involved, to the extent known.
5. Extent of injuries, if any.
6. Possible hazards to human health or the environment, outside of the facility.

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]

If the emergency coordinator's assessment indicates that evacuation of facility areas may be advisable, he will implement the evacuation plan for the facility, see Appendix A7-2. 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 Table A7.D.1). The National Response Center will also be notified (see Table A7.D.1), and the following information will be provided:

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

The facility's evacuation plan is included in this Contingency Plan as Appendix A7-2. The Gage LSF evacuation map has been provided in Figure A7-2-1 of Appendix A7-2 (Evacuation Plan and Routes).

A7.D.5 Procedures to Be Used to Ensure that Fires, Explosions, and Releases Do Not Occur, Reoccur, or Spread During the Emergency

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

Whenever there is an imminent or actual emergency situation where the potential or actual release of hazardous waste or hazardous waste constituents may threaten human health or the environment, the

facility will implement the procedures listed in Section A7.D.5.

The facility personnel who discover the situation will activate the emergency communication system, thereby alerting the Emergency Coordinator or designate who can then contact the Emergency Coordinator by telephone.

The Emergency Coordinator or designate will contact the appropriate spill-cleanup contractors and state or local agencies, if their assistance is needed.

In the event that an individual or individuals have come in contact with organic solvents, facility personnel will immediately assist the victim to the emergency eyewash or shower where the affected area will be rinsed with water. Other injured personnel will also receive immediate first aid and medical attention. If necessary, the hospital or clinic will be notified immediately. The safety of personnel and other individuals will be the first concern of the Emergency Coordinator.

During an emergency, the Emergency Coordinator will take all reasonable measures necessary to ensure that fires, explosions or releases do not recur or spread to other areas of the facility site. Some actions which might be employed include:

- Shutting off pumps, valves, or lines (if required) to stop the release.
- Start sump pumps to transfer accumulated runoff into available tanks.
- Place portable pumps into service to transfer accumulated runoff.
- Deploy suitable containment materials to erect temporary dams in the path of the flow of released materials.

And

- All emergency-response personnel will utilize personal protective equipment, including gloves, boots, goggles or face shields, aprons, and other equipment appropriate to the emergency.
- All nonessential personnel will be evacuated from the immediate area of the emergency. If total facility evacuation is indicated, the evacuation procedures/plan provided in Appendix A7-2 will be followed.
- Any processes or operations that may interfere with emergency response will be stopped. Valves, pipes, and other equipment will be monitored for leaks, pressure build-up, gas generation or ruptures.
- The character, source, and extent of the emergency will be evaluated. The actual or potential release of hazardous wastes will be identified.
- Fire extinguishers will be utilized by trained personnel to contain the spread of fire, if appropriate. Upon the arrival of the fire department, the directions of the fire chief will be followed in handling the emergency. Foam trailers will be staged for use by the fire department to extinguish or prevent the spread of fires.
- All measures will be undertaken to prevent the contact of any released materials with incompatible materials, such as organic material with skin and eyes, and flammable materials with any spark-emitting sources or open flames.
- Released materials that are not contained will be prevented from entering any storm drains or sewers, through the use of oil booms or dams and inert absorbent materials suitable to the released materials. Spark-proof equipment will be used to remove flammable materials.
- If possible, the area will be sectioned-off with caution tape to limit access to the spill area (or hot zone) until the emergency has been cleared and the area cleaned.
- For emergency situations involving tanks, any materials released into the secondary containment system will be pumped out and disposed of according to applicable regulations. No materials will be placed into a defective tank or associated piping until repairs have been made to eliminate the potential for leakage, fire or explosion.
- For emergency situations involving drums or other containers during storage, any materials released

into the secondary containment system will be pumped out and disposed of according to applicable regulations. Leaking or potentially leaking drums and containers will be placed into recovery drums or other containers that will be properly labeled.

- The spill area will be washed with water and appropriate surfactants. After the spill area has been cleaned, the Emergency Coordinator will determine if the area is safe to return to normal use.
- All safety and emergency equipment will be decontaminated and thoroughly cleaned before being placed back into storage. Used spill-response materials and those materials that cannot be decontaminated will be appropriately disposed of and replaced with new emergency-response materials and equipment.

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

	Federal	
	Name/Address	**Office Phone**
1	**U.S Environmental Protection Agency** National Response Center Local Office (Grosse Ile) Region V Duty Officer (24 hour) District 9 Coast Guard	 (800) 424-8802 (734) 676-6500 (312) 353-2318 (216) 902-6045
2	**U.S. Coast Guard Captain of the Port** Business Hours Evening Hours District 9 Coast Guard	 (313) 568-9580 (313) 568-9524 (216) 902-6045
	State	
	Name/Address	**Office Phone**
3	**Michigan Dept. of Environment, Great Lakes, and Energy (EGLE)** Pollution Emergency Alerting System (PEAS)(24 hours) Environmental Assistance Division SE Michigan Field Office Lansing Office MMD Director-secretary	 (800) 292-4706 (800) 662-9278 (586) 753-3700 (517) 284-6551
4	**Fire or Police**	**911**
5	**State Police**	(248) 584-5740
6	**Poison Control Center**	(800) 222-1222
7	**Railroad Contact:** CN Police	(800) 465-9239
8	**Michigan Department of Licensing & Regulatory Affairs (LARA)** **Bureau of Fire Services** MSP HazMat hotline Storage Tank Division	 (800) 525-5555 (517) 335-7211
	Local	
	Name/Address	**Office Phone**
9	**Ferndale Fire Marshall**	(248) 546-2510
10	**Local Emergency Planning Committee** ***Emergency Management*** 1200 North Telegraph Road Oakland County Office of Emergency Management, LEPC Pontiac, MI 48341	 (248) 858-5080
11	**Spill Cleanup Contractors** Marine Pollution Control EPA I.D. #: MID 049 277 718 8631 W Jefferson Detroit, MI 48209	 (313) 849-2333 **(24 hours)**

	US Ecology – a division of Republic EPA I.D.# MID 593 743 838 26705 Northline Road Taylor, MI 48180 Barr Engineering Co. (Consultation) 4771-50th Street S.E. Suite 1 Grand Rapids, MI 49512	(800) 899-4672 or (734) 941-4397 (616) 554-3210
12	**Great Lakes Water Authority (Detroit Water & Sewerage Dept.)** Day Time Phone System Control (Spill Reporting) City of Ferndale, Water Department Leader	 (313) 224-4775 or (313) 964-9400 (313) 267-6000 or (313) 267-9000 (248) 546-2513 or (248) 867-0262
13	**Weather Report** http://www.wunderground.com/US/MI/Detroit.html	
14	**Local Television/Radio Station for Evacuation Notification** WWJ	 (248) 945-9950
15	**Medical Emergency** William Beaumont Hospital 3601 West 13 Mile Road Royal Oak, MI 48072 1st Choice Urgent Care 29628 Southfield Rd. Southfield, MI 48076 (Daily 9 A.M. – 8:30 P.M.)	 (248) 898-2000 (248) 621-9040
16	**Victory Lane Adult Foster Care Group Home**	(248) 398-1032
17	**Gage Products Company Technical Advisors:** Mr. Stephen Summerfield, Chemist Mr. Phil Gaietto, Operations/Engineering Manager Ms. Madhur Malhotra, Director of Laboratories Mr. John Thomas, Operator Mr. Chris Scott, FSG, boilers and weekends Ms. Andrea Seychel, Environmental Manager Ms. Maureen Finn, Health & Safety Manager	 (586) 226-1408 (248) 763-4380 (248) 915-5024 (248) 542-4564 or (248) 330-2864 (248) 388-3590 (248) 320-5875 (248) 212-4951

Appendix A7-3 has a detailed description of the type, amount, and location of all emergency equipment at Gage's LSF.

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)]

Any processes or operations that may interfere with emergency response will be stopped. Valves, pipes, and other equipment will be monitored for leaks, pressure build-up, gas generation or ruptures.

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)]

Immediately after an emergency, the Emergency Coordinator will make arrangements for the treatment, storage, or disposal of recovered wastes or any other contaminated materials. The treatment, storage, or disposal of recovered wastes and contaminated materials will be conducted in accordance with applicable regulations governing the management of these materials.

The Emergency Coordinator will determine the regulatory status of the released substance and associated spill-cleanup materials. This determination will be made according to the following guidelines:

- If the material is from a spill of a listed hazardous waste, then the cleanup materials, spill residues, and other contaminated materials must be managed as hazardous wastes.

- If the material is from a spill of a commercial a chemical product that is listed under RCRA or Act 451, then the cleanup materials, spill residues, and other contaminated materials must be managed as hazardous wastes.

- If the material is from a spill of a waste that possesses hazardous-waste characteristics, the cleanup materials, spill residues, and other contaminated material must be managed as hazardous wastes if these materials also possess the hazardous-waste characteristics as defined under RCRA and Act 451 (i.e., corrosivity, toxicity, ignitability, and reactivity). Analytical testing may have to be undertaken in order to make this determination.

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

Incompatible Waste

The Emergency Coordinator will ensure that no wastes which are incompatible with the released materials are managed in that area until cleanup procedures are completed.

Post-Emergency Equipment Maintenance

After an emergency event, all emergency equipment listed in Appendix A7-3 (Emergency Equipment Information) will be replaced or cleaned so that it is fit for use. Before operations are resumed, an inspection of all safety equipment will be conducted as discussed in Attachment A5 (Inspection Requirements) and Appendix A7-3 (Emergency Equipment Information). The U.S EPA Regional Administrator, the EGLE, and local authorities will be notified by the Emergency Coordinator that post-emergency equipment maintenance has been performed and operations at the facility will be resumed.

Container Spills and leakage (40 CFR 264.171)

Refer to Section A7.D.5 for a detailed description of the emergency response procedures for container spill and leakage. If a container holding hazardous waste is not in good condition or it begins to leak, the waste from this container will be transferred to a container in good condition. An entire leaking 55-gallon drum may also be placed within a larger recovery drum.

Tank Spills and Leakage (40 CFR 264. 194)

Refer to Section A7.D.5 for a detailed description of emergency-response procedures for tank spills and leakage. Any spill or leak from the storage tanks will be contained within the secondary containment structure that has been provided.

Post-Spill Soil Sampling and Analysis

In the unlikely event that a spill or release occurs which contaminates soil, grab samples of the soil will be taken in order to determine the extent of contamination. Soil samples will be collected using ASTM Standard D 1452-65. The samples will be analyzed for appropriate parameters, to be determined by the spilled material (e.g. U.S. EPA method 8260 for ignitability or corrosivity). In all events, proper procedures will be followed, which will include those identified in the most current EGLE's Environmental Response Division's Draft Guidance for Determining Adequacy of Soil Remediation, that will effectively characterize the nature

and extent of the spill or release. Remediation of the affected area will be initiated based upon the results of the characterization.

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

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

A7.E.1 Procedures to Be Used Prior to Resuming Operations
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(h)]

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

A7.E.2 Record Keeping Requirements
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(i)]

A7.E.2(a) Operating Record

In the event of an emergency situation that requires implementation of the Contingency Plan, the emergency coordinator will record in the operating record the time, date, and description of the event. The operating record is maintained by Gage LSF and can be found at the following location: 625 Wanda Ave, Ferndale, Michigan.

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

Within 15 days of an incident requiring implementation of the Contingency Plan, Gage's LSF will submit a written incident report to EGLE at the following address:

Chief of the Office of Materials Management Division
Department of Environment, Great Lakes, and Energy
P.O. Box 30241
Lansing, MI 48909

The report will contain the following information:

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

A7.F PROCEDURE FOR ASSESSING OFFSITE RISK DURING AND AFTER A FIRE/EXPLOSION INCIDENT OR SIGNIFICANT RELEASE
[R 299.9521(3)(b) and R 299.9607 and 40 CFR §264.56(d)]

Air Monitoring During Incident

If air monitoring during an incident is required, Gage LSF will contract with a spill response contractor to:

1.a If possible and needed, model dispersion and deposition of the release with real time parameters to

determine likely extent of plume and assist local authorities making shelter-in-place or evacuation recommendations.

1.b Establish air monitoring equipment in locations upwind and downwind of the incident using visual/meteorological data, and update, as needed, with modeling results. Monitoring should continue until downwind data is consistent with upwind values.

1.c Air monitoring should be conducted utilizing approved methods and include as many of the identified substances as possible. In the event of a fire/explosion, continuous particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) should be monitored as well. The spill response contractor will determine what kind of monitoring equipment will be necessary (e.g., $PM_{2.5}$ meters for fire events, SUMMA canisters/Tedlar bags for volatile organic compounds released from ruptured tanks), and which ones will be readily available.

Record Incident Parameters

Gage LSF will:

2.a Document the time the incident began and the duration of the overall incident. Identify the specific location(s) where the incident began.

2.b Identify employees/witnesses having direct involvement or direct knowledge of the incident.

2.c Identify any relevant witnesses to the incident.

2.d Gather local meteorological data from the National Weather Service (point-specific data are available at the National Oceanic and Atmospheric Administration web site) and identify any characteristics noted by personnel directly involved with the incident or recorded elsewhere.

Develop Narrative

Gage LSF will develop a narrative as part of the response action and will:

3.a Determine the sequence of events and timeline leading up to and throughout the incident. Review the incident with employees directly involved and other onsite peripheral witnesses such as office staff, truck drivers, etc. Access other tools and resources, as available (automated data records, surveillance cameras, etc.).

3.b Identify specific event locations, materials, substances, and equipment involved in incident.

3.c Identify and characterize, to the extent possible, the size and scope of incident.

Comprehensive List of Materials or Substances Involved

Gage LSF will:

4.a Identify the materials/substances that may have been involved in the incident, 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 offsite records. Verify that the most up to date records are used.

4.b Determine the volume, concentration, and weight of substances identified above, and determine how they may have been altered by the incident (e.g., pyrolysis products, decomposition, degradation, and both known and potential mixture reactions). Based on this information, begin developing a list of substances of potential concern.

4.c Ensure that information critical to the response activity is kept in the information repository identified by EGLE.

Post Incident Sample Collection

Gage LSF will:

5.a Work with the spill response contractor or consultant to develop a sampling plan, as appropriate, for the collection of waste, groundwater, soil, ash, airborne dust, debris, surface water, and/or wipe samples. The plan may take into account fallout density, air monitoring data, visual observation, or air modeling. A statistical sampling design may not be necessary for the screening evaluation. Post incident, offsite sampling may not be necessary based on air monitoring data and lack of offsite migration or deposition.

5.b Collect a sufficient number of samples to identify and characterize concentrations of substances involved in the incident. Include sampling for background concentrations.

5.c Complete the analysis of collected samples and review by comparison to relevant environmental protection standards. Environmental protection standards may have to be developed for some chemicals or environmental media.
5.d Identify and document any substances found to be present in levels that exceed environmental protection standards.

Evaluate Data for Screening Potential Risk

Gage LSF will:
6.a Compare existing data to relevant environmental protection standards.
6.b Prepare risk assessment report and submit it to EGLE, Materials Management Division (MMD) within 90 days after the incident.
6.c If less than environmental protection standards, no further action is needed for offsite potential releases upon approval of the OWMRP.
6.d If the data is greater than the environmental protection standards, proceed with corrective action after notification from EGLE.

Corrective Action

Gage LSF will perform corrective action based on results of information gathered in previous steps in accordance with standard emergency response actions as determined by Gage LSF and Gage LSF's response contractor.

A blank checklist is provided in Appendix A7-4.

Any of the actions incorporated into this procedure will be performed by Gage LSF personnel to the extent possible. However, much of the offsite sampling and monitoring will, in all likelihood, have to be performed by a duly authorized governmental agency as such activities can present legal barriers to Gage LSF.

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

This contingency Plan will be reviewed and amended whenever:

- The facility permit is revised.
- Applicable regulations are revised.
- The plan fails in an emergency.
- The facility changes in design, construction, operation, maintenance or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in any emergency.
- The list of emergency coordinators changes.
- The list of emergency equipment changes
- The plan will be reviewed every five years as required by SPCC regulations

Appendix A7-1: Documentation of Arrangements with Local Authorities

Appendix A7-2: Evacuation Plan

Appendix A7-3: Emergency Equipment Description

Appendix A7-4: Checklist for Tracking Facility Response Actions During and After a Fire/Explosion Incident

Appendices

Appendix A7-1

Documentation of Arrangements with Local Authorities

GAGE PRODUCTS COMPANY

February 28, 2024

Emergency Plan Reviewer
1st Choice Urgent Care
29628 Southfield Road
Southfield, MI 48076

Certified Mail-Return Receipt
No.: 7021 0350 0001 0828 9134

Subject: Updated Contingency Plan Submittal

Dear Administrator,

Enclosed is an updated copy of Gage Product Company's Oil Spill Prevention, Control and Countermeasures (SPCC) and Pollution Incident Prevention Plan (PIPP), dated Feb 2024, which also includes the facility Contingency Plan. This information is being provided to familiarize emergency response personnel with our facility, including: layout, the types and hazards of materials handled, the names and telephone numbers of emergency coordinators, the location of working areas, access routes into and within the facility, possible evacuation routes from the facility, and the types of injuries or illness which could result from a release of material at the facility.

In the Contingency portion of the SPCC/PIPP, Gage has established procedures to be followed to minimize hazards to human health or the environment resulting from fires or explosions, spills or releases, or natural disasters. Please review and provide comments on the plan, as necessary.

I state that the information provided in this Pollution Incident Prevention Plan is accurate and true to the best of my knowledge and that the measures described in this plan will be implemented as described.

It is Gage Product Company's intent that through prevention and planning, potential incidents will not occur, and that those that do will be properly handled and minor.

Thank you for your consideration.

With regards,

Brenna Harden

Brenna Harden
Director, Environmental, Health & Safety
Gage Products Company

Enclosure: SPCC/PIPP Plan, Feb 2024

7021 0350 0001 0828 9134

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Southfield, MI 48076

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☐ Adult Signature Restricted Delivery	$
Postage	$11.70
Total Postage and Fees	$19.75

0220
24

FERNDALE MI 48220
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Sent To 1st Choice Urgent Care
Street and Apt. No., or PO Box No. 29628 Southfield Rd
City, State, ZIP+4® Southfield MI 48076

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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9590 9402 7538 2098 1755 28

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☐ Addressee

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SOUTHFIELD MI
MAR 5 2024
USPS 48076

3. Service Type
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☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over $500)
☐ Priority Mail Express®
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March 1, 2024, 1:46 pm

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GAGE PRODUCTS COMPANY

February 28, 2024

Head Librarian
Ferndale Area District Library
222 E. Nine Mile Road
Ferndale MI 48220

Certified Mail-Return Receipt
No.: 7021 0350 0001 0828 9097

Subject: Updated Contingency Plan Submittal

Dear Head Librarian,

Enclosed is an updated copy of Gage Product Company's Oil Spill Prevention, Control and Countermeasures (SPCC) and Pollution Incident Prevention Plan (PIPP), dated Feb 2024, which also includes the facility Contingency Plan. This information is being provided to familiarize emergency response personnel with our facility, including: layout, the types and hazards of materials handled, the names and telephone numbers of emergency coordinators, the location of working areas, access routes into and within the facility, possible evacuation routes from the facility, and the types of injuries or illness which could result from a release of material at the facility.

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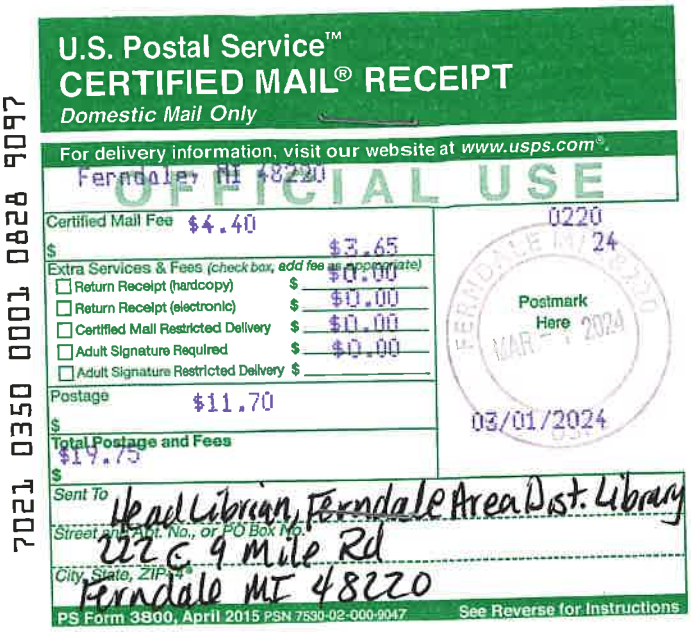
Thank you for your consideration.

With regards,

Brenna M. Harden

Brenna Harden
Director, Environmental, Health & Safety
Gage Products Company

Enclosure: SPCC/PIPP Plan, Feb 2024



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Total Postage and Fees $19.75

0220
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FERNDALE MI 48220
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03/01/2024

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Street and Apt. No., or PO Box No.: 222 E 9 Mile Rd
City, State, ZIP+4®: Ferndale MI 48220

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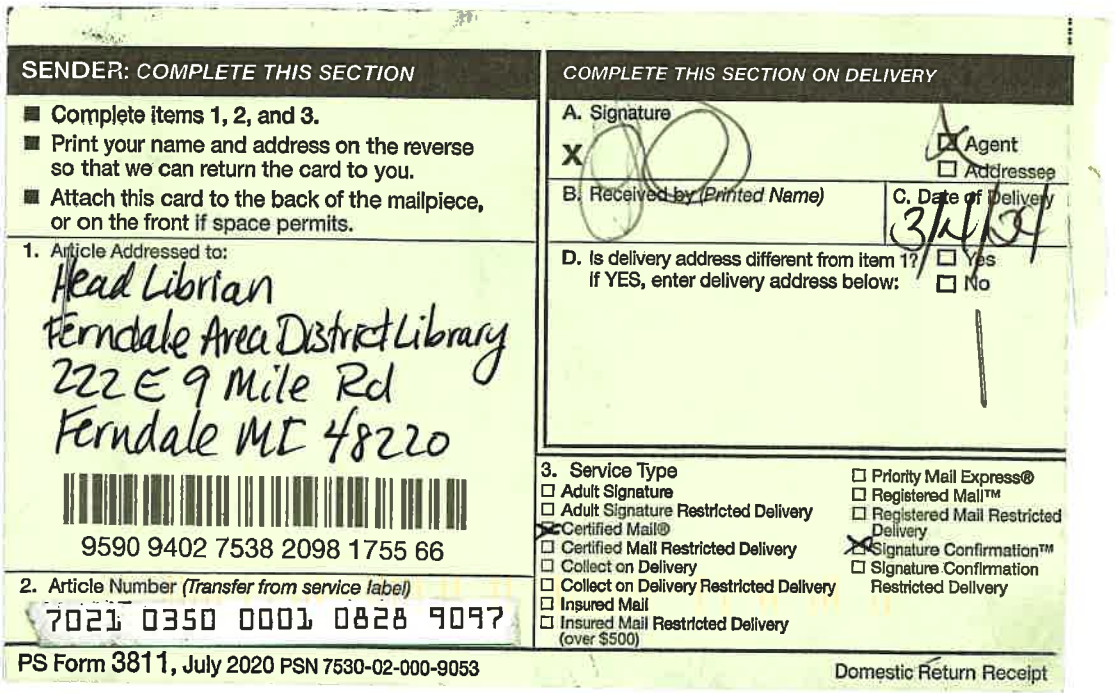
7021 0350 0001 0828 9097



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222 E 9 Mile Rd
Ferndale MI 48220

9590 9402 7538 2098 1755 66

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A. Signature
X
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☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery
3/1/24

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
- ☐ Adult Signature
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- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
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GAGE PRODUCTS COMPANY

February 28, 2024

Fire Chief Teresa Robinson
Ferndale Fire Department
1635 Livernois
Ferndale MI 48220

Certified Mail-Return Receipt
No.: 7021 0350 0001 0828 9035

Subject: Updated Contingency Plan Submittal

Dear Chief Robinson,

Enclosed is an updated copy of Gage Product Company's Oil Spill Prevention, Control and Countermeasures (SPCC) and Pollution Incident Prevention Plan (PIPP), dated Feb 2024, which also includes the facility Contingency Plan. This information is being provided to familiarize emergency response personnel with our facility, including: layout, the types and hazards of materials handled, the names and telephone numbers of emergency coordinators, the location of working areas, access routes into and within the facility, possible evacuation routes from the facility, and the types of injuries or illness which could result from a release of material at the facility.

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Thank you for your consideration.

With regards,

Brenna M Harden

Brenna Harden
Director, Environmental, Health & Safety
Gage Products Company

Enclosure: SPCC/PIPP Plan, Feb 2024

7021 0350 0001 0828 9035

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$0.80 03/01/2024

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☐ Return Receipt (hardcopy)	$ $0.00
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☐ Certified Mail Restricted Delivery	$ $0.00
☐ Adult Signature Required	$ $0.00
☐ Adult Signature Restricted Delivery	$
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$	
Total Postage and Fees	$19.75
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FERNDALE MI 0220 24 MAR 2024 Postmark Here

03/01/2024

Sent To: Fire Chief, Ferndale Fire Dept
Street and Apt. No., or PO Box No.: 1635 Livernois
City, State, ZIP+4®: Ferndale MI 48220

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Fire Chief Teresa Robinson
Ferndale Fire Department
1635 Livernois
Ferndale MI 48220

9590 9402 7538 2098 1756 27

2. Article Number (Transfer from service label)
7021 0350 0001 0828 9035

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☐ Collect on Delivery Restricted Delivery
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GAGE PRODUCTS COMPANY

February 28, 2024

Emergency Plan Reviewer
Corewell Health William Beaumont University Hospital
3601 W. 13-Mile Road
Royal Oak, MI 48073

Certified Mail-Return Receipt
No.: 7021 0350 0001 0828 9127

Subject: Updated Contingency Plan Submittal

Dear Administrator,

Enclosed is an updated copy of Gage Product Company's Oil Spill Prevention, Control and Countermeasures (SPCC) and Pollution Incident Prevention Plan (PIPP), dated Feb 2024, which also includes the facility Contingency Plan. This information is being provided to familiarize emergency response personnel with our facility, including: layout, the types and hazards of materials handled, the names and telephone numbers of emergency coordinators, the location of working areas, access routes into and within the facility, possible evacuation routes from the facility, and the types of injuries or illness which could result from a release of material at the facility.

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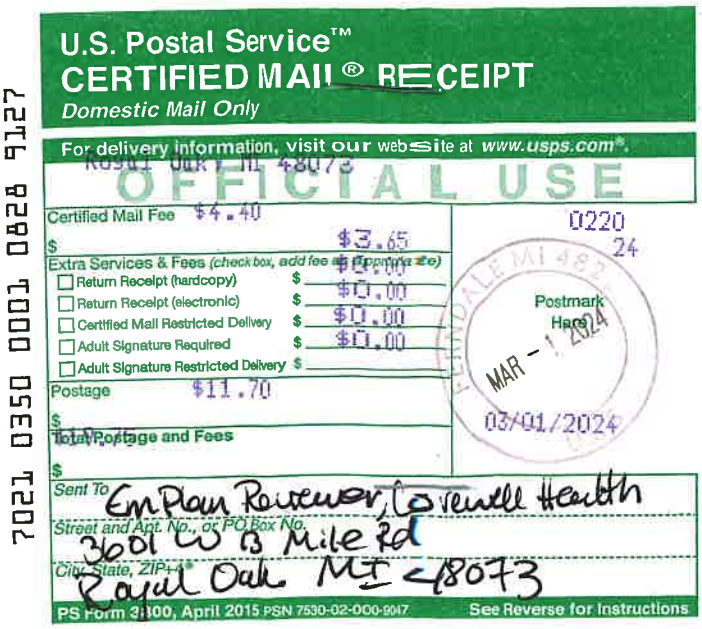
Thank you for your consideration.

With regards,

Brenna M-Harden

Brenna Harden
Director, Environmental, Health & Safety
Gage Products Company

Enclosure: SPCC/PIPP Plan, Feb 2024



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- Adult Signature Required $ $0.00
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Total Postage and Fees

0220 24

Postmark Here
MAR - 1 2024
03/01/2024

Sent To Em Plan Reviewer, Corewell Health
Street and Apt. No., or PO Box No. 3601 W 13 Mile Rd
City, State, ZIP+4® Royal Oak MI 48073

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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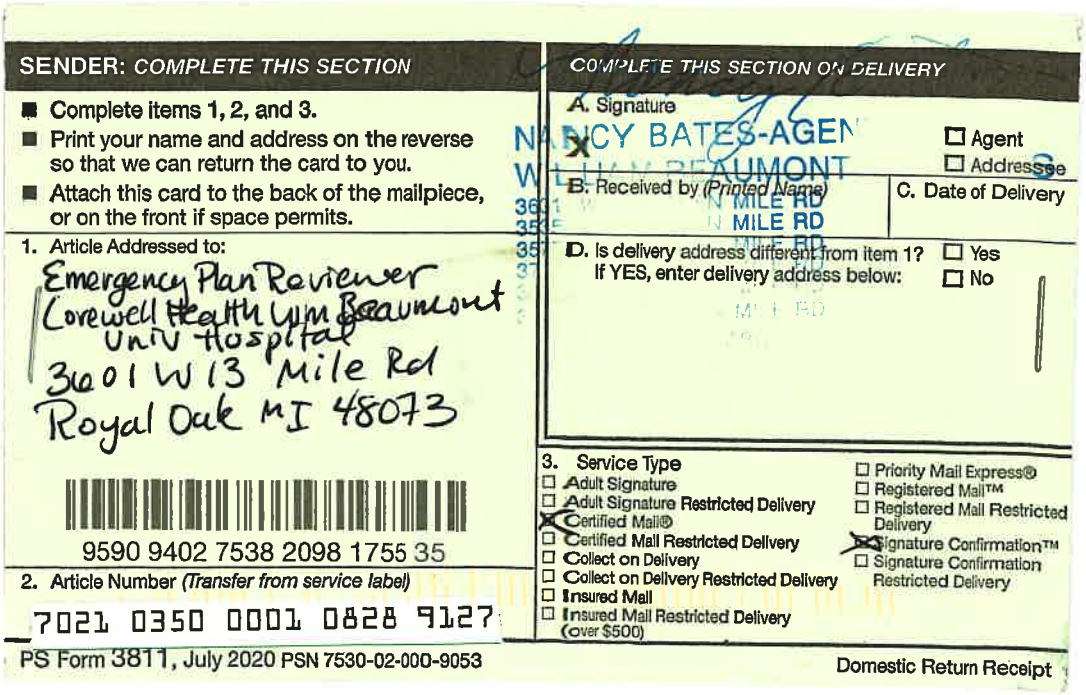

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Emergency Plan Reviewer
Corewell Health Lyn Beaumont
Univ Hospital
3601 W 13 Mile Rd
Royal Oak MI 48073

9590 9402 7538 2098 1755 35

2. Article Number (Transfer from service label)

7021 0350 0001 0828 9127

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X NANCY BATES-AGEN ☐ Agent ☐ Addressee

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ROYAL OAK, MI 48073
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FAQs

GAGE PRODUCTS COMPANY

February 28, 2024

Daniel VerHaeghe
Emergency Response Plan Contact
Marine Pollution Control
8631 W Jefferson Ave
Detroit MI 48209

Certified Mail-Return Receipt
No.: 7021 0350 0001 0828 9073

Subject: Updated Contingency Plan Submittal

Dear Mr. VerHaeghe,

Enclosed is an updated copy of Gage Product Company's Oil Spill Prevention, Control and Countermeasures (SPCC) and Pollution Incident Prevention Plan (PIPP), dated Feb 2024, which also includes the facility Contingency Plan. This information is being provided to familiarize emergency response personnel with our facility, including: layout, the types and hazards of materials handled, the names and telephone numbers of emergency coordinators, the location of working areas, access routes into and within the facility, possible evacuation routes from the facility, and the types of injuries or illness which could result from a release of material at the facility.

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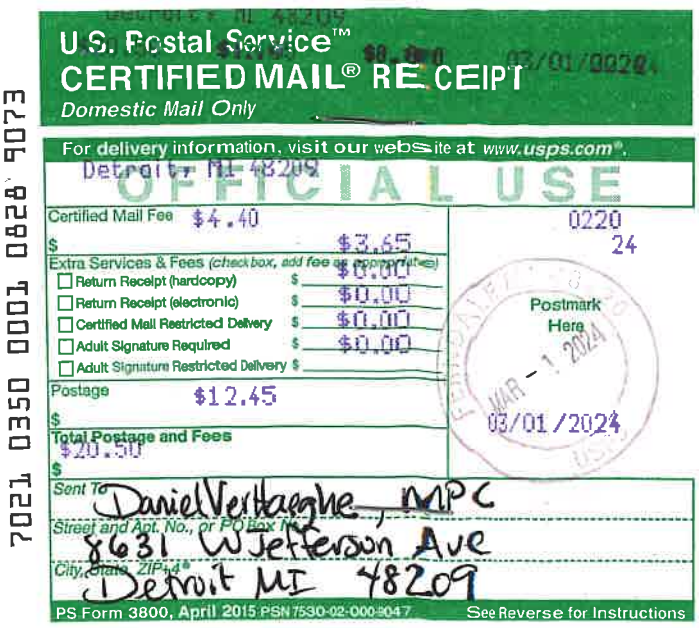
Thank you for your consideration.

With regards,

Brenna M. Harden

Brenna Harden
Director, Environmental, Health & Safety
Gage Products Company

Enclosure: SPCC/PIPP Plan, Feb 2024



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Postage $12.45

Total Postage and Fees $20.50

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Postmark Here
MAR - 1 2024
03/01/2024

Sent To: Daniel Vertlieghe, MPC
Street and Apt. No., or PO Box No.: 8631 W Jefferson Ave
City, State, ZIP+4®: Detroit MI 48209

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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DETROIT, MI 48209
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GAGE PRODUCTS COMPANY

February 28, 2024

Mr. Darin Page
Oakland County Local Emergency Planning Committee
Emergency Management Division
1200 N Telegraph Rd, Dept 410
Pontiac MI 48341

Certified Mail-Return Receipt
No.: 7021 0350 0001 0828 9059

Subject: Updated Contingency Plan Submittal

Dear Mr. Page,

Enclosed is an updated copy of Gage Product Company's Oil Spill Prevention, Control and Countermeasures (SPCC) and Pollution Incident Prevention Plan (PIPP), dated Feb 2024, which also includes the facility Contingency Plan. This information is being provided to familiarize emergency response personnel with our facility, including: layout, the types and hazards of materials handled, the names and telephone numbers of emergency coordinators, the location of working areas, access routes into and within the facility, possible evacuation routes from the facility, and the types of injuries or illness which could result from a release of material at the facility.

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Thank you for your consideration.

With regards,

Brenna M Harden

Brenna Harden
Director, Environmental, Health & Safety
Gage Products Company

Enclosure: SPCC/PIPP Plan, Feb 2024

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☐ Return Receipt (electronic)	$ $0.00
☐ Certified Mail Restricted Delivery	$ $0.00
☐ Adult Signature Required	$ $0.00
☐ Adult Signature Restricted Delivery	$
Postage	$12.45
$	
Total Postage and Fees	$20.50
$	

0220
FERNDALE MI 48220
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03/01/2024

Sent To: Darin Page, LEPC
Street and Apt. No., or PO Box No.: 1200 N Telegraph Rd, Dept 410
City, State, ZIP+4®: Pontiac MI 48341

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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1. Article Addressed to:
Darin Page
Oakland Cty LEPC
Em Mgmt Div
1200 N Telegraph Rd, Dept 410
Pontiac MI 48341

9590 9402 7538 2098 1756 03

2. Article Number (Transfer from service label)
7021 0350 0001 0828 9059

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A. Signature
X
☐ Agent
☐ Addressee

B. Received by (Printed Name) R Wilson
C. Date of Delivery 3/5

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3. Service Type
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GAGE PRODUCTS COMPANY

February 28, 2024

Daniel P. Dailey, M.A., P.E., Acting Supervisor
Michigan Department of Environment, Great Lakes and Energy
Materials Management Division
Constitution Hall, 1st Floor South
525 W Allegan
PO Box 30242
Lansing, MI 48909-7742

Certified Mail-Return Receipt
No.: 7021 0350 0001 0828 9080

Subject: Updated Contingency Plan Submittal

Dear Mr. Dailey,

Enclosed is an updated copy of Gage Product Company's Oil Spill Prevention, Control and Countermeasures (SPCC) and Pollution Incident Prevention Plan (PIPP), dated Feb 2024, which also includes the facility Contingency Plan. This information is being provided to familiarize emergency response personnel with our facility, including: layout, the types and hazards of materials handled, the names and telephone numbers of emergency coordinators, the location of working areas, access routes into and within the facility, possible evacuation routes from the facility, and the types of injuries or illness which could result from a release of material at the facility.

In the Contingency portion of the SPCC/PIPP, Gage has established procedures to be followed to minimize hazards to human health or the environment resulting from fires or explosions, spills or releases, or natural disasters. Please review and provide comments on the plan, as necessary.

I state that the information provided in this Pollution Incident Prevention Plan is accurate and true to the best of my knowledge and that the measures described in this plan will be implemented as described.

It is Gage Product Company's intent that through prevention and planning, potential incidents will not occur, and that those that do will be properly handled and minor.

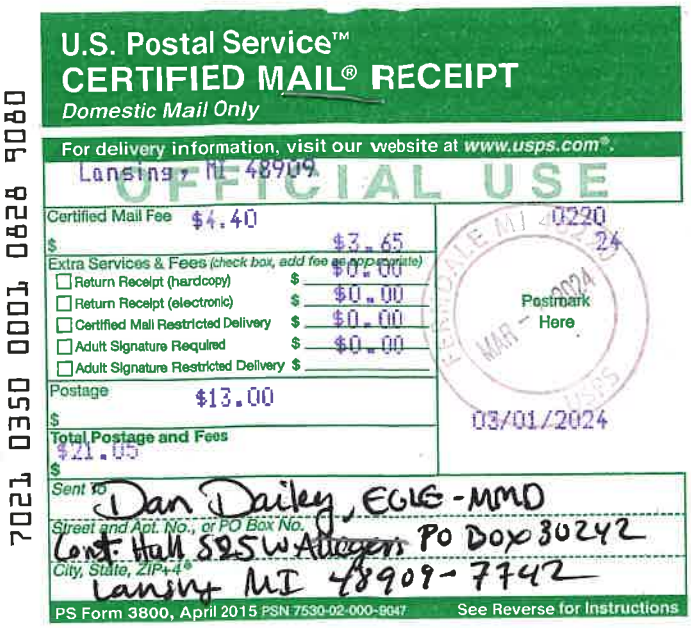
Thank you for your consideration.

With regards,

Brenna M. Harden

Brenna Harden
Director, Environmental, Health & Safety
Gage Products Company

Enclosure: SPCC/PIPP Plan, Feb 2024



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☐ Adult Signature Required	$
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Postage	$13.00
$	
Total Postage and Fees	$21.05
$	

0220 24
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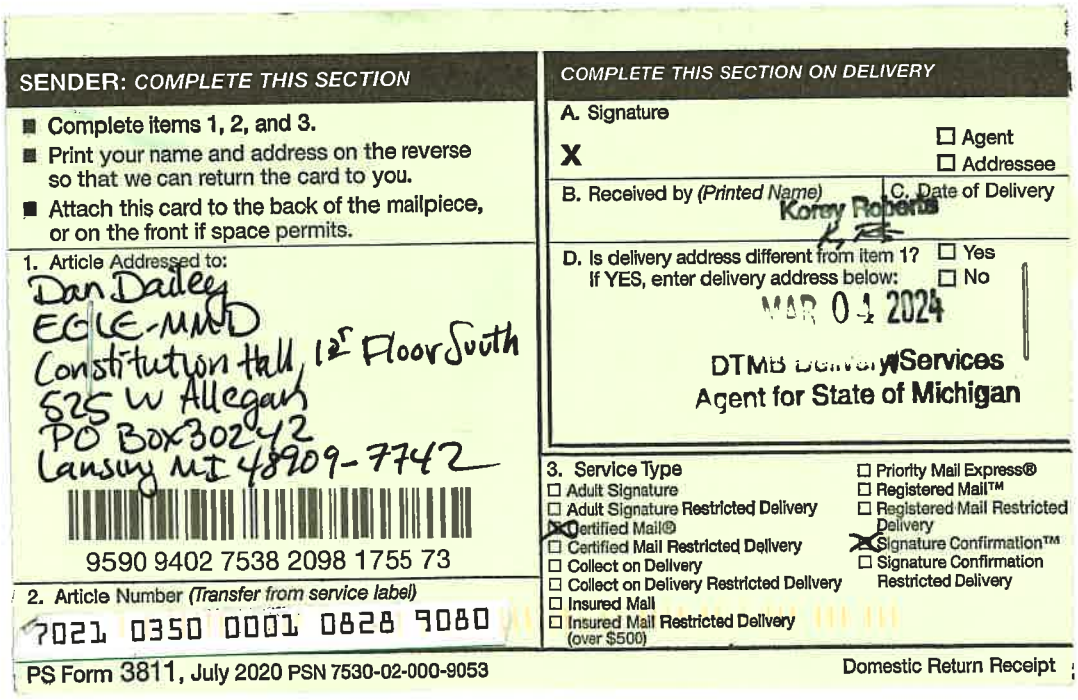
MAR 2024
03/01/2024

Sent to: Dan Dailey, EGLE-MMD
Street and Apt. No., or PO Box No.: Const. Hall 525 W Allegan PO Box 30242
City, State, ZIP+4®: Lansing MI 48909-7742

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7021 0350 0001 0828 9080



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1. Article Addressed to:
Dan Dailey
EGLE-MMD
Constitution Hall, 12th Floor South
525 W Allegan
PO Box 30242
Lansing MI 48909-7742

9590 9402 7538 2098 1755 73

2. Article Number (Transfer from service label)
7021 0350 0001 0828 9080

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X ☐ Agent ☐ Addressee

B. Received by (Printed Name) Korey Roberts
C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

MAR 04 2024

DTMB Delivery Services
Agent for State of Michigan

3. Service Type
- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
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LANSING, MI 48924
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GAGE PRODUCTS COMPANY

February 28, 2024

Ryan Rogers
US Ecology a Republic Service Company
26705 Northline
Taylor MI 48180

Certified Mail-Return Receipt
No.: 7021 0350 0001 0828 9028

Subject: Updated Contingency Plan Submittal

Dear Mr. Rogers,

Enclosed is an updated copy of Gage Product Company's Oil Spill Prevention, Control and Countermeasures (SPCC) and Pollution Incident Prevention Plan (PIPP), dated Feb 2024, which also includes the facility Contingency Plan. This information is being provided to familiarize emergency response personnel with our facility, including: layout, the types and hazards of materials handled, the names and telephone numbers of emergency coordinators, the location of working areas, access routes into and within the facility, possible evacuation routes from the facility, and the types of injuries or illness which could result from a release of material at the facility.

In the Contingency portion of the SPCC/PIPP, Gage has established procedures to be followed to minimize hazards to human health or the environment resulting from fires or explosions, spills or releases, or natural disasters. Please review and provide comments on the plan, as necessary.

I state that the information provided in this Pollution Incident Prevention Plan is accurate and true to the best of my knowledge and that the measures described in this plan will be implemented as described.

It is Gage Product Company's intent that through prevention and planning, potential incidents will not occur, and that those that do will be properly handled and minor.

Thank you for your consideration.

With regards,

Brenna M Harden

Brenna Harden
Director, Environmental, Health & Safety
Gage Products Company

Enclosure: SPCC/PIPP Plan, Feb 2024

7021 0350 0001 0828 9028

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☐ Adult Signature Required	$ $0.00
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Postage	$12.45
$	
Total Postage and Fees	$20.50
$	

0220
24

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Sent To: Ryan Rogers, USEcology
Street and Apt. No., or PO Box No.: 26705 Northline
City, State, ZIP+4: Taylor MI 48180

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ryan Rogers
USEcology (a RepublicServices Com)
26705 Northline
Taylor MI 48180

9590 9402 7538 2098 1756 41

2. Article Number (Transfer from service label)
7021 0350 0001 0828 9028

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X
☐ Agent
☐ Addressee

B. Received by (Printed Name): Ryan Rogers
C. Date of Delivery: 3-5-24

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

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☐ Collect on Delivery Restricted Delivery	
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TAYLOR, MI 48180
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GAGE PRODUCTS COMPANY

September 23, 2024

Kennan Jefferson
LaGarda Security
11685 Mt. Elliott
Detroit MI 48212

Certified Mail-Return Receipt
No.: 7021 0350 0001 0828 9271

Subject: Updated Contingency Plan Submittal

Dear Mr. Jefferson,

Enclosed are updated pages to the recently shared Gage Product Company's Oil Spill Prevention, Control and Countermeasures (SPCC) and Pollution Incident Prevention Plan (PIPP), from Feb 2024, which also includes the facility Contingency Plan. This information is being provided to familiarize emergency response personnel with our facility, including: layout, the types and hazards of materials handled, the names and telephone numbers of emergency coordinators, the location of working areas, access routes into and within the facility, possible evacuation routes from the facility, and the types of injuries or illness which could result from a release of material at the facility.

In the Contingency portion of the SPCC/PIPP, Gage has established procedures to be followed to minimize hazards to human health or the environment resulting from fires or explosions, spills or releases, or natural disasters.

Please insert these pages to the plan on file as the changes were just administrative in nature (personnel changes.)

I state that the information provided in this Pollution Incident Prevention Plan is accurate and true to the best of my knowledge and that the measures described in this plan will be implemented as described.

It is Gage Product Company's intent that through prevention and planning, potential incidents will not occur, and that those that do will be properly handled and minor.

Thank you for your consideration.

With regards,

Brenna M. Harden

Brenna Harden
Director, Environmental, Health & Safety
Gage Products Company

Enclosure: SPCC/PIPP Plan, Sep 2024 excerpt changes

7021 0350 0001 0828 9271

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Hamtramck, MI 48212

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☐ Return Receipt (hardcopy)	$0.00
☐ Return Receipt (electronic)	$0.00
☐ Certified Mail Restricted Delivery	$0.00
☐ Adult Signature Required	$0.00
☐ Adult Signature Restricted Delivery	$
Postage	$1.01
Total Postage and Fees	$9.96

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SEP 21 2024
Postmark Here

Sent To: Kennan Jefferson
Street and Apt. No., or PO Box No.: LaGarda Security 11685 Mt. Elliot
City, State, ZIP+4®: Detroit, MI 48212

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

Appendix A7-2

Evacuation Plan and Routes

APPENDIX A7-2
EVACUATION PLAN AND ROUTES

LIST OF FIGURES

A7-2.I Evacuation Plan (40 CFR 264.52(F))

All emergencies require prompt and deliberate action. In the event of any major emergency, an established set of procedures will be followed. These procedures will be followed as closely as possible; however, in specific emergency situations, the Emergency Coordinator may deviate from the procedures to provide a more effective plan for bringing the situation under control. The Emergency Coordinator is responsible for determining which emergency situations require facility evacuation.

The telephone system, paging system, or runners will be used as the warning system to notify key facility personnel as to the nature of the emergency and recommended plan of action. Total facility evacuation is initiated only by the Emergency Coordinator. The public address system is the primary means of initiating a facility evacuation. The fire-alarm system provides a back-up evacuation signal.

A fire-alarm system has alarm boxes located at critical areas throughout the facility. The fire alarms can also be used to summon aid in other emergency situations. All applicable employees are familiar with alarm box locations. The alarm system is an audible horn which can easily be heard in all parts of the facility.

In the event that all reasonable measures fail to control the emergency or if human health or the environment outside the facility is threatened, the Emergency Coordinator will:

- Commence the signal for facility evacuation and notify employees, contractors, and visitors to evacuate the facility through any of the exits determined to be safe at the time of the emergency (see Attachment A7, Figure A7-2-1 for evacuation routes and designated assembly areas).
- Immediately open the gates and direct that no further entry of visitors, contractors, or trucks be permitted. All vehicle traffic movement within the facility will cease in order to allow the access of emergency equipment.
- Not allow any persons to remain or re-enter the facility unless specifically authorized by the Emergency Coordinator. The Emergency Coordinator will then direct and assume responsibility for those persons remaining or re-entering the facility.
- Maintain communication with evacuated supervisors to determine if all employees, contractors, and visitors are present and accounted for in the designated assembly areas. Accounting for the presence of visitors will be the responsibility of the employees they are seeing and contractors will be the responsibility of those personnel supervising them. Truck drivers will be the responsibility of the supervisor where the truck is loading or unloading.
- Receive the final tally of persons not accounted for in the evacuation assembly areas. No attempt will be made to locate persons not accounted for unless it can be done without endangering others and the search has been directed by the Emergency Coordinator.
- Determine whether evacuation of the areas surrounding the facility should be initiated. If required, the Specialized Residential Care Group home located directly across Wanda from the facility will be contacted to allow them extra time to be evacuated promptly and safely. Local emergency-response agencies will be immediately contacted, and the Emergency Coordinator will assist these agencies if it is determined to be necessary to initiate evacuation.
- Give a signal or other notification to indicate that the facility is safe and cleared for re-entry.

A7-2.I.1 Emergency Response Procedures

A7-2.I.1a Notification (40 CFR § 264.56 (a) and (b))

In the event of an emergency situation first notify the emergency coordinator (this may be a supervisor), subsequently notify all facility personnel, appropriate federal, state, or local agencies, and fire or police departments, as appropriate. Table A7.B-1 and Table A7.D-1 of Attachment A7, lists phone numbers of groups that have made arrangements to assist in emergencies and includes: primary and alternate emergency coordinators, local police and fire departments, hospitals, contractors, and State and local response teams.

The Emergency Coordinator will use the below notification guidelines for the following situations:

Fire and/or Explosion

1. A fire emergency call will be given to the emergency coordinator by the person identifying the fire, or the emergency coordinator.
2. Immediately upon receiving this call, the emergency coordinator will determine the location by asking the caller.
3. The following announcement is to be made over the public address system:

   Your Attention Please; Your Attention Please. This is an Emergency! There is a Fire in (GIVE LOCATION). Please evacuate the premises immediately, and report to the evacuation area.

4. Repeat the announcement and activate the alarm (if not activated already). Collect the visitor logbooks, leave the building immediately, and report to the designated assembly area.

Spill

1. A spill emergency call will be given to the emergency coordinator.
2. The following announcement is to be made over the public address system:

   Your Attention Please; Your Attention Please. This is an Emergency! There is a Spill in (GIVE LOCATION). Please evacuate the premises immediately, and report to the evacuation area.

3. Repeat the announcement and activate the alarm (if not activated already). Collect the visitor logbooks, leave the building immediately, and report to the designated assembly area.

Tornado

1. Tornado Warning: A tornado has been detected. Take Shelter Immediately.
2. The following announcement is to be made over the public address system:

   Your Attention Please; Your Attention Please. A Tornado Warning has been issued for the Oakland County area. Please evacuate all work areas and congregate in the innermost hallways of the buildings.

3. Repeat the announcement and take shelter.

A7-2.I.1b General Control Procedures (40 CFR § 264.52(a))

Whenever there is an imminent or actual emergency situation where the potential or actual release of hazardous materials may threaten human health or the environment:

- The facility personnel who discover the situation will contact the Emergency Coordinator or designate who can then contact the Emergency Coordinator by telephone.

- The Emergency Coordinator or designate will contact the appropriate spill cleanup contractors and state or local agencies, if their assistance is needed.

- In the event that an individual or individuals have come in contact with organic solvents, facility personnel will immediately assist the victim to the emergency eyewash or shower where the affected area will be rinsed with water. Other injured personnel will also receive immediate first aid and medical attention. If necessary, the hospital or clinic should be notified immediately. The safety of personnel and other individuals will be the first concern of the Emergency Coordinator.

- All emergency-response personnel will utilize personal protection equipment, including gloves, boots, goggles or face shields, aprons, and other equipment appropriate to the emergency.

- All nonessential personnel will be evacuated from the immediate area of the emergency. If total facility evacuation is indicated, the evacuation plan and procedures summarized in Section A7.2 above will be followed.

- Stop any processes or operations that may interfere with emergency response. Monitor valves, pipes, and other equipment for potential problems.

- Evaluate the character, source, and extent of the emergency. The actual or potential release of hazardous wastes will be identified.

- Trained personnel will utilize the foam firefighting trailers and/or fire extinguishers to contain the spread of fire, if appropriate. Once the fire department arrives, the directions of the fire chief will be followed in handling the emergency.

- Undertake all safe measures to prevent the contact of any released materials with incompatible materials, such as organic material with skin and eyes, and flammable materials with any spark-emitting sources or open flames.

- Prevent released materials that are not contained from entering any sewers or floor drains, through the use of booms or dams and inert absorbent materials suitable to the released materials. Spark-proof equipment will be used to remove flammable materials.

- If necessary, rope off the area to limit access to the area until the emergency has been cleared and the area cleaned.

- If needed, equipment coordinators will be assigned by the emergency coordinator to insure that no extra complications are caused because of the emergency and may include these specific duties:

    1. Shut down electrical and gas service to the fire damaged area.
    2. Supervise salvage operations and debris removal.
    3. Provide emergency repairs to restore laboratory operations.

4. In the event of a tornado, shut down natural gas supply at the main valve, in addition to the above duties.

- For emergency situations involving tanks, any materials released into the secondary containment system will be pumped out and disposed of according to applicable regulations. No materials will be placed into a damaged tank or associated piping until repairs have been made to eliminate the potential for leakage or explosion. Depending on the size of the release, outside assistance may be needed for response.

- For emergency situations involving drums or other containers during storage, any materials released into the secondary containment system will be pumped out and disposed of according to applicable regulations. Damaged or potentially damaged drums and containers will be placed into a recovery drum that will be properly labeled.

- The spill area will be washed with water and appropriate surfactants. After the spill area has been cleaned, the Emergency Coordinator will determine if the area is safe to return to normal use.

- All safety and emergency equipment will be decontaminated and thoroughly cleaned before being placed back into storage. Used spill-response materials and those materials that cannot be decontaminated will be appropriately disposed of and replaced with new emergency-response materials and equipment.

Fire and/or Explosion

The storage areas can be easily accessed by fire fighting and other emergency vehicles and equipment. A paved road about 25 ft. in width passes within 100 ft. of each of these areas.

Notify the local fire department in case of any fire emergency. During times of power failure or severe weather, the emergency coordinators will ensure protection of personnel and property. If fire should break out, concentration will be placed on preventing the fire from spreading to nearby areas.

The following actions will be taken in the areas affected by the fire or explosion:

1. Activate the fire alarm and notify the switchboard operator (after hours, notify all personnel using the public address system).
2. Contact the emergency coordinator.
3. If an area is evacuated, close doors in affected areas.
4. Immediately shut down work in all affected areas.
5. Shut down feed lines and additional equipment as necessary.
6. Open gates for access of emergency vehicles, and turn the power off.
7. Clear the area of all personnel not actively fighting the fire. These persons are to report to the emergency check-in station for accountability. If access to this is restricted, the vacant lot diagonal from 474 will also be utilized.
8. Remove all injured persons, and have qualified personnel administer medical treatment.
9. The emergency coordinator will account for all personnel in evacuation area.

Because fire is always a potential hazard in spills of flammable material, eliminate all possible sources of ignition. Vehicular traffic and hazardous work in the area will cease until the spill is contained and safety is restored. Foaming of the spill or flushing with large quantities of water will be performed if advised by the fire chief with the emergency coordinators advice.

If a highly flammable material is released and a hazard exists, all persons within at least a one quarter mile radius will notified. All ignition sources within this area will be eliminated. Use of motor vehicles within this

area will be restricted or eliminated to avoid ignition of the vapor. If the chance of an explosion is high, the entire area within a 2000 ft. radius of the source will be evacuated.

If a fire is involved and is concentrated at the source, people will be evacuated up to a half mile downwind. Firefighting will not be done at the at the risk of injury to the persons involved.
However, early containment of fires can significantly decrease total damage.

Area or plant evacuation will be necessary in case of major fire or explosion. Specifics are outlined in the Evacuation Plan regarding general evacuation procedures. All personnel are trained in evacuation procedures and means of exit from their respective work areas.

Until evacuation is signaled, personnel who are not in affected area will stay in their respective work areas. Contract personnel and visitors will be cleared from the area and instructed to report to the emergency check-in station.

The emergency coordinator or designee will be responsible for all firefighting efforts until outside help arrives. All work will cease in unaffected areas. Personnel should be ready to evacuate and be accounted for.

An “all clear” signal will be given when the fire has been extinguished, and personnel can return to their respective work areas. The Fire Chief will determine when the emergency has passed and consult with the Emergency Coordinator before the “all clear” signal is given. All emergency equipment used in the emergency must be cleaned and fit for use prior to resumption of plant operation in the affected area.

Spills or Materials Release

General Spill Procedures

In the event of a major emergency involving a chemical spill, the following general procedures will be used for rapid and safe response and control of the situation. These are general guidelines, and circumstances may dictate some alterations on these procedures. Additionally, a flow diagram is provided for referral regarding reporting requirements for both facility and transportation releases (see Notification procedures Attachment A7, Section A7.D).

If the employee discovers an oil or chemical spill or process upset resulting in a vapor release, he or she will immediately report it to an emergency coordinator. The employee or area supervisor will contact the designated Emergency Coordinator at the time of the incident. When contacted, the designated 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 the spill, vapor, or smoke release is heading.
5. Whether the spilled material could enter the sewer system or move off-site
6. Any injuries involved.
7. Fire and/or explosion or possibility of these events.
8. The area and materials involved and the intensity of the fire or explosion.

The information will help the Emergency Coordinator to assess the magnitude and potential seriousness of the spill or release. If the accident is determined to lie within the company’s emergency response capabilities, the Emergency Coordinator will contact and deploy the necessary in-plant personnel. If the accident is beyond plant capabilities, the Emergency Coordinator will contact the appropriate agencies and outside contractors.

The initial response to any emergency will be to protect human health and safety, and then the environment. Identification, containment, treatment, and disposal assessment will be the secondary response.

If for any reason, the spill is not contained in the dike or sump area, an area of isolation will be established around the spill. The size of the area will generally depend on the size of the spill and the material involved. If the spill is large or involves a reasonably dangerous material, an initial isolation of at least 100 feet in all directions will be used. Small spills or leaks from a drum or pipe will require evacuation of at least 50 feet in all directions to allow cleanup and repair 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. If possible, the area will be roped or otherwise blocked off.

If the spill results in the formation of a toxic vapor cloud (by reaction with surrounding materials or by outbreak of fire) and it is released, further evacuation will be initiated. An area at least 500 ft. wide and 1000 ft. long will be evacuated downwind if volatile materials are spilled. Industrial areas within a mile of the plant will be notified if a large quantity of spilled material ignites.

Small Spill Response Procedures (40 CFR § 264.171)

In the event of a small or incidental spill or leak (usually less than 55 gallons), most would be easily contained within the dikes and sumps provided in process and transfer areas. Small spills occurring in contained areas would be cleaned up with absorbents or flushed with plenty of water, to the sump provided in that area. If necessary, a portable sump pump will be used to pump the waste material into 55-gallon drums.

For small spills, the following steps should be taken (only if the employee's health and safety is not in danger). Notify an Emergency Coordinator and others in the area, then:

1) Eliminate all sources of ignition.
    a) Turn off all unnecessary electrical equipment.
    b) Turn off all nearby lift trucks.
    c) Stop all car and truck traffic near spill.
2) Assess Situation-Identify material and hazards
3) Get appropriate Personal Protective Equipment
4) Initiate Response-Stop Spill
    a) Shut down all pumps.
    b) Shut off all valves.
    c) If possible, roll drum so that leak is above liquid level.
5) Contain spill.
    a) Try to dike off spill using absorbent material or spill dikes (available at spill control stations).
    b) Prevent spill from entering sewer systems.
    c) A leaking drum can be transferred to another drum or placed within a recovery drum.
6) Dispose of spill containment materials only in open headed drums.
7) Decontaminate equipment and spill area.
8) Complete Environmental Incident Report.

Each incident will be evaluated to determine if it involves a release of hazardous waste or hazardous waste constituents to air, soil, or surface water, which could threaten human health or the environment 40 CFR § 264.51 (b). Usually these small, incidental spills are not reportable to outside authorities and do not require full implementation of the Contingency plan.

Tank Spills and Leakage (40 CFR § 264.194)

Refer to Section A7-2.I.1b: General Control Procedures for a detailed description of emergency-response procedures for tank spills and leakage. Any spill or leak from the tanks should be contained within the secondary containment structure that has been provided.

Large Spill Response Procedures

In the event of a reportable spill or serious leak the following guidelines will be followed as closely as possible:

1) Eliminate 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 assess the situation by obtaining the following information:
   a) Person(s) injured and seriousness of injury.
   b) Location of the spill or leak, material involved, and source (tank, pipeline, etc.)
   c) The approximate amount spilled, and estimates of the liquid and/or gas discharge rate, and the direction the liquid flow or gaseous cloud is moving.
   d) Whether or not fire is involved.
2) Next, the Emergency Coordinator will:
   a) Initiate evacuation of the hazard area. For smaller spills or leaks, 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) Notify all employees through the emergency coordinator according to the Notification Procedures described in section A7.2.I.1a.
   c) Obtain medical attention for any injured persons. It may be helpful to instruct the caller in initial first aid procedures. Then call the hospital and send a copy of the Safety Data Sheet if there has been an exposure to a chemical.
   d) Call the fire department if a fire is involved. Fight small fires with dry chemicals, CO, or foam; and large fires with water spray or fog. Keep heat-exposed containers cooled with water spray and remove them from the fire if possible.

CAUTION: IF A RISING SOUND COMES FROM A VENTING DEVICE OR THE TANK BEGINS TO DISCOLOR, WITHDRAW FROM THE AREA IMMEDIATELY
(Concern: Boiling Liquid Expanding Vapor Explosion (BLEVE))

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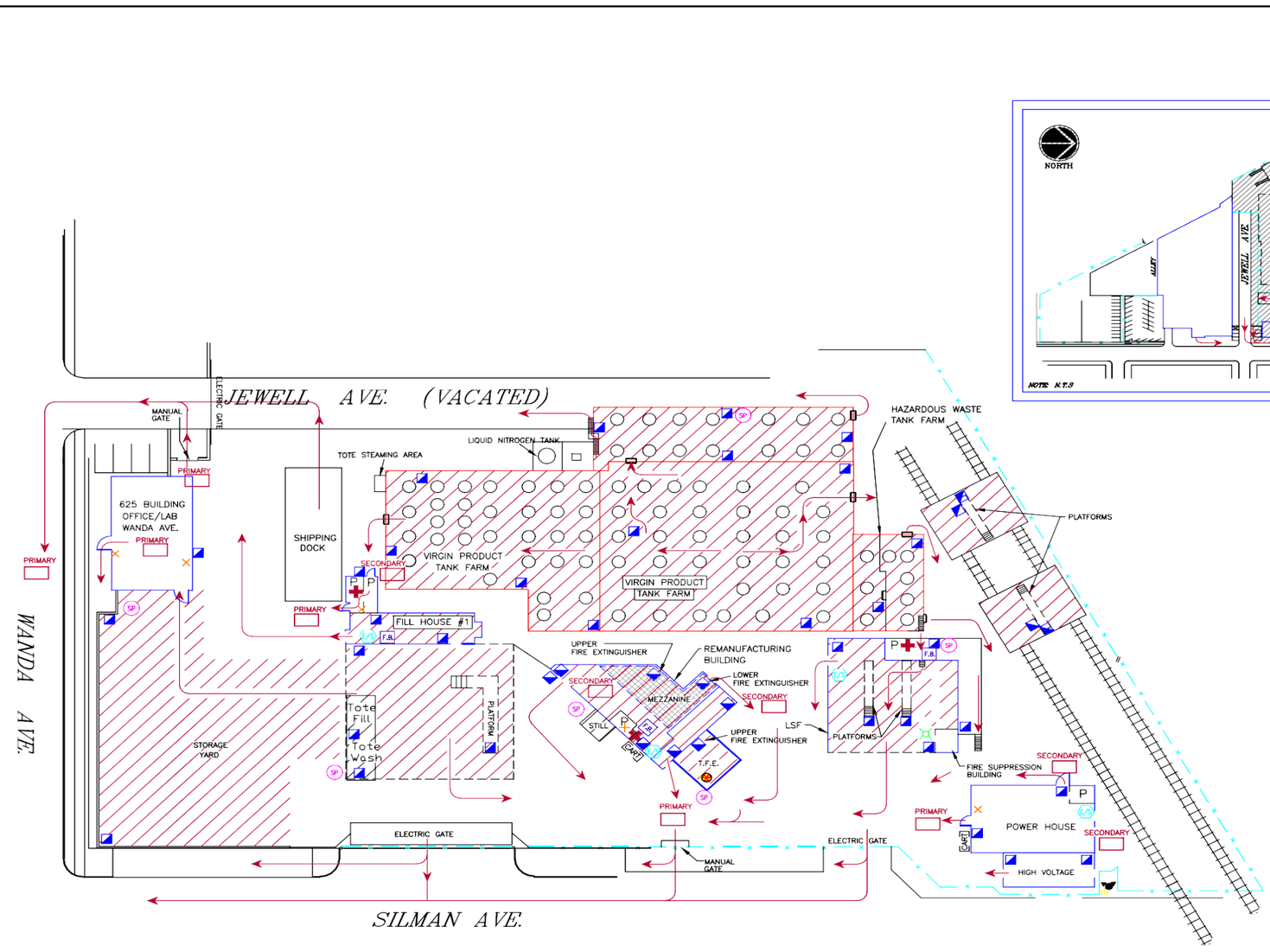
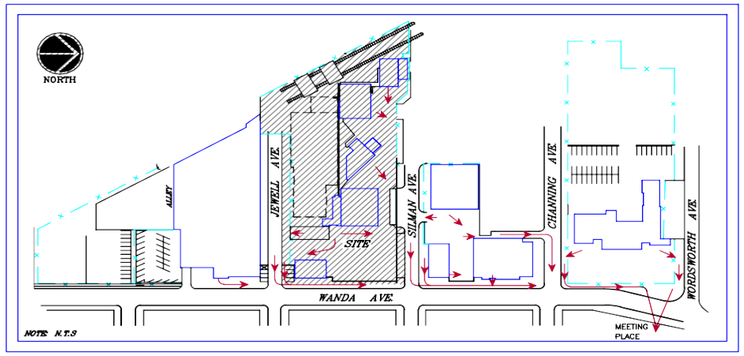
   e) Instruct employees to utilize appropriate personal protective equipment and dispatch trained emergency personnel to the site to take the appropriate action.
   f) Contact the proper authorities (federal, state, and local) if the spill or release exceeds a reportable quantity. Contact the local authorities first so that, if necessary, down-stream water users and/or persons downwind of the vapor can be notified and evacuated if necessary. If a large spill occurs, the initial evacuation area downwind should be 0.2 mile long (= 1000 feet) by 0.1 miles wide (= 500 feet). If a tank containing waste becomes involved in a fire, isolate an area 1/2 mile in all directions.
3) **Emergency Response Personnel will:**

a) Make sure all unnecessary persons are removed from the hazard area and isolate or rope-off the area to prevent people from entering the immediate affected area.
b) Assess Situation and determine the major components in the released material so that appropriate protective clothing and equipment can be utilized.
c) When flammable liquid is involved, remove all ignition sources, use spark and explosion proof equipment in containment and cleanup, and utilize bonding and grounding.
d) If possible, try to stop the leak. Special materials will be kept on hand for temporary repairs.
e) Remove all surrounding materials that could be especially reactive with the spilled product.
f) Use absorbent pads, booms, loose absorbent, and other inert materials to contain, divert and clean up a spill if it has not been contained in a dike or sump. Most spills contained within the dike or sump can be pumped into an appropriate storage tank or drum.
g) If wastes reach a storm sewer, try to dam the out-fall to the city sewer system by using booms, organic absorbent, sand etc. If a spill enters a storm drain, use absorbent booms and sweeps around the out-fall to contain and absorb water insoluble organics.
h) Place all recovered liquid wastes and contaminated soil into drums for removal to an approved disposal site.
i) Decontaminate the area and all protective clothing and equipment.
j) Complete an Environmental Incident Report.

Figure A7-2- 1 Evacuation Route Map





NORTH

LEGEND

- P TELEPHONE
- FIRE ALARM
- FIRE EXTINGUISHER
- FIRST AID KIT
- EYE WASH/SHOWER
- SP SPILL KIT
- F.B. FIRE BLANKET
- CART FIRE EXTINGUISHER (PORTABLE CART)
- FIRE HYDRANT
- EVACUATION ROUTE
- STAIRS/LADDER
- PRIMARY OR SECONDARY EXIT
- EMERGENCY EVACUATION PLAN
- FLAMMABLE BLEND/ TRANSFER/ STORAGE
- 2 mCi CS-137 in Sealed Source Container

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GAGE PRODUCTS COMPANY
821 WANDA AVENUE - FERNDALE, MI 48220
(248)541-0824 www.gageproducts.com

REV#	REVISIONS	BY	DATE

GAGE PRODUCTS COMPANY
6-A 625 Lot
Evacuation Plan

REVISION #: 0
REV DATE: 20240816
DRAWN BY: MD

SHEET 1 OF 1

Appendix A7-3

Emergency Equipment Description

APPENDIX A7-3
EMERGENCY EQUIPMENT INFORMATION

LIST OF TABLES

A7-3.J Emergency Equipment (R 299.9606 and 40 CFR 264.32)

A7-3.J.1 Internal Communication (40 CFR 264.32(a))

An internal alarm system and a voice communications system capable of providing immediate emergency signals to facility personnel are available on the site. The Facility is equipped with an emergency alarm actuator system that provides when pulled, an alarm signal, which is audible throughout the facility. The location of the alarm actuators is indicated on emergency evacuation plans included as Appendix A7-2, Figure A7-2-1 of Attachment A7 (Evacuation Map). In addition, the Limited Storage Facility (LSF) building is provided with a complete automatic, dry-pipe, sprinkler system. When activated, this system provides both an audible alarm at the facility as well as an alarm to alert the Ferndale Fire Department.

Internal voice communications is provided by means of the facility telephone system or cellular phones. Telephones/public address speakers are located in the office area, the material unloading/loading area, the filling building, the remanufacturing building, and the limited Storage Facility building. In the event of an emergency, an alert will be sounded via this public address system alerting employees to the situation. In the event of an emergency at the LSF, a phone located at the unloading dock receiving area will be used to summon help. Depending upon the nature of the emergency, the call for help may be to the emergency coordinator or alternate, facility security (nights, weekends, and holidays), or the local police or fire departments.

A7-3.J.2 External Communication (40 CFR 264.32 (b))

External communication is also provided through the facility telephone system (as described in section A7-3.J.1 above).

A7-3.J.3 Access to Communication and Alarm Systems (40 CFR 265.340)

All facility personnel involved in any transfer operations have immediate access to the internal alarm-system pull boxes and telephone system. The Alarm-actuator pull boxes and telephones are located in areas where personnel would be working during these operations. These alarm-actuator pull boxes and telephones are maintained free and clear of obstructions.

In the event that there is only one employee on the premises when the facility is in operation, this employee will have immediate access to the telephones which connect to the guard station and are equipped with outside lines. Refer to Attachment A7, Appendix A7-2, for the emergency evacuation map (Figure A7-2-1) and evacuation plan. Refer to Table A7-3.J-1 in this plan for emergency equipment with location.

Table A7-3.J 1 Emergency Equipment (40 CFR 264.52)

Emergency Equipment Inventory		
Alarm Actuators		
Item	**Location**	**Capabilities**
1 Office area	downstairs hallway	All manual alarms are connected to an audible alarm, which sounds throughout the facility. The Alarm is also monitored by Centralarm. Centralarm alerts the local fire or police departments
2 remanufacturing	Southeast corner	
3 Limited Storage Facility	Northwest corner	
4 Boiler House	Northeast Corner	
Telephone/Cellular		
Item	**Location**	**Capabilities**
1 Office area	downstairs hallway	Provide internal and external communication and also site wide paging capabilities.
2 Fill House 1	South wall	
3 Fill House 2	Northwest wall	
4 Limited Storage Facility	South wall near truck well	
Fire Extinguishers		
Item	**Location**	**Capabilities**
1 Office	north wall	All fire extinguishers throughout facility are rated ABC and are capable of extinguishing wood, solvent, and electrical fires.
2 Office	central wall	
3 Fill House	near east door	
4 Fill House	south wall	
5 Fill House	northwest corner	
6 Remanufacturing	near north door	
7 Remanufacturing	southwest wall	
8 Remanufacturing	northwest wall	
9 Limited Storage Facility	near east door	
10 Limited Storage Facility	near north door	
11 Limited Storage Facility	Mezzanine	
12 Limited Storage Facility	Mezzanine	
13 Limited Storage Facility	near west door	
14 Boiler House	east wall	
15 Boiler House	west wall	
Foam Trailers		
Item	**Location**	**Capabilities**
2 Warehouse	515 Warehouse	Two Titan Model 401 Tote Mule Foam Trailers with concentrated bulk foam for use on chemical fires
Water Supply for Fire Control		
1 Center of Jewell	Southeast corner of Jewel and Wanda	
1 Center of Jewell	Southeast corner of Silman and Wanda	
1 Center of Jewell	Southeast corner of Channing and Wanda	

Emergency Equipment Inventory		
1 Center of Jewell	West end of Silman (near railroad)	
1 Center of Jewell	Southwest corner of Wordsworth and Wanda	

A7-3.J.4 Emergency Equipment

Portable fire extinguishers are located throughout the facility. Each fire extinguisher is classified for Class A, B and C fires, has a capacity of 20 pounds, and is multipurpose for dry chemical uses. Their locations at the facility are illustrated in Appendix A7-2, Figure A7-2-1 of Attachment A7 and are summarized in Table A7-3.J-1 of this attachment.

Spill-response equipment for use in containing and cleaning up spilled hazardous wastes is stored throughout the facility. Primary spill-control and emergency response stations, as illustrated in Table A7-3.J-1, are located in the Tank Truck loading/unloading area, the remanufacturing area, the LSF, and the Boiler House (see figure in Appendix A7-2, Figure A7-2-1 of Attachment A7).

Small first-aid kits are located throughout the facility, as indicated on Appendix A7-2, Figure A7-2-1 of Attachment A7. A large first-aid kit is located in the main office. The first aid kits contain the following items:

Bandage Materials

- band-aids
- gauze pads and rolls
- adhesive tape
- butterfly bandages
- multi-trauma dressings
- anti-bacterial ointments
- splints
- aspirin
- emetic-syrup of ipecac
- local and topical anesthetics
- blood borne pathogens kit
- eyewash bottle and solution

Decontamination equipment and personal safety equipment are provided at the facility as follows: emergency showers and eyewash fountains located within the LSF, Solvent Laboratory, Boiler House, Fill Houses, and the Remanufacturing area.

The drench shower and eye waste station are located on the east wall, immediately north of the southeast foot traffic entrance/exit to the LSF.

Protective clothing and equipment are provided to protect employees during normal and emergency operations. Hard hats, protective eyewear, and steel-toed boots or shoes are the minimum protective clothing required. Other protective clothing and equipment available on-site include:

Protective Clothing

- Rubber and neoprene boots
- Short and long rubber gloves
- Solvent resistant suits
- Polyethylene gloves

Protective Equipment

- Face shield, goggles, and extra protective eyeglasses
- Disposable dust respirators
- Chemical cartridge respirators with cartridges for organic vapors and acid gases; half and full-face types
- Self-contained Breathing Apparatus (SCBA)

This clothing and the equipment are located in a storage area in the EHS department for easy access by personnel.

The LSF building has a spill-control station which is located in the northwest corner of the unloading/loading area just west of the truck dock and is available to respond to spills of various characteristics within the LSF. The spill drum contains the following supplies:

Spill Supplies

- Absorbent pads, pillows, socks and loose
- Stainless steel over-pack drum
- Spill Stoppers designed for nearby drains
- Plastic over-pack drum
- Bucket, mop, and wringer
- Spark resistant shovel

A portable pneumatic pump is also available to remove spills from the containment sumps.

A7-3.J.5 Water for Fire Control (R 299.9606 and 40 CFR 264.32 (d))

Water is provided to the facility from the City of Ferndale water supply mains, which provides a water flow of 57 static, 48 residual, with 1460 gallons per minute flowing. Water supply is available to the facility at the location indicated on Appendix A7-2, Figure A7-2-2 of Attachment A7.

The LSF building is equipped with an automatic, dry pipe, sprinkler system that is supplied by an eight-inch water main with water pressure less than 60 psi. Capacity is 0.37 gpm over the most remote 2500 square feet and 1000 gpm for hose demand. A flow switch and an electric alarm bell, located on the building's exterior, are connected to the automatic, dry-pipe, sprinkler system.

A7-3.J.6 Aisle Space Requirements

Access into the facility and movement within the facility is maintained free and clear of obstructions in order to allow movement of personnel, fire protection equipment, and spill-control and decontamination equipment within the facility. Aisles and walkways between tanks and equipment in both the storage and process areas are maintained free and clear of obstructions in order to project unobstructed movement of personnel and portable emergency equipment within these areas.

A7-3.J.7 Emergency Equipment Inspection and Maintenance (40 CFR 264.33)

All facility alarm systems, fire-protection equipment, spill control equipment, and decontamination equipment are inspected, tested, and maintained on a regular basis to ensure proper operation during an emergency. Attachment A5 provides more detail regarding inspection schedules and procedures.

Appendix A7-4

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

Appendix A7-4

EQP Form 5111

Checklist - Tracking Facility Response Actions During and After a Fire/Explosion Incident

Date Incident Started:_____ **Staff Name and Office:** _____

Facility Name and Location:_____

Comments:,_____

1. Air Monitoring During Incident
Owner/operator (if the facility is equipped with monitoring instruments), in combination with federal (EPA, NOAA) and local hazmat response teams - As soon as can be mobilized

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

Comments:

2. Record Incident Parameters
Owner/Operator - As soon as access is available to employees/witnesses

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

Comments:

3. Develop Event Narrative
Owner/Operator - As soon as access is available to employees/witnesses

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

Comments:

4. Develop a Comprehensive List of Materials or Substances Involved
Owner/operator in combination with regulatory and health agencies and hazardous materials (hazmat) response teams - As soon as possible

Status e.g. Pending or Complete	Date Completed	ACTION

		a. Identify all of the materials/substances that may have been involved in the event, using the information obtained in the previous steps, inventory records and/or container/tank logs, laboratory data, approval records, material safety data sheets, or any other means available. Use a generic list initially, and then develop a final list from off-site records. Verify that the most up-to-date records are used.
		b. Determine the volume, concentration, and weight of substances identified above, and determine how they may have been altered by the event (e.g., pyrolysis products, decomposition, degradation, and both known and potential mixture reactions). Based on this information, begin developing a list of compounds of potential concern.
		c. The OWMRP shall identify the primary location where information and documents used to in previous steps 3.a. and 3.b. will be housed and ensure that information critical to response an activity is kept in that location.
Comments:		

5. Post-Incident Sample Collection

Owner/Operator, in combination with EPA, DEQ, and OCH - During and/or immediately following the incident

Status e.g. Pending or Complete	**Date Completed**	**ACTION**
		a. Develop a sampling plan for the collection of waste, groundwater, soil, ash, airborne dust, debris, surface water, and/or wipe samples, as appropriate. The plan, or the need for one, may take into account fallout density, air monitoring data, visual observation, or air modeling. A statistical sampling design may not be necessary for the screening evaluation. Post-incident, off-site sampling may not be necessary based on air monitoring data and lack of off-site migration or deposition.
		b. Collect a sufficient number of samples to identify and characterize concentrations of substances involved in the incident. Include sampling for background concentrations.
		c. Complete the analysis of collected samples and review by comparison to relevant screening levels. Screening levels may have to be developed for some chemicals or environmental media.
		d. Identify and document any substances found to be present in levels that exceed screening levels.
Comments:		

6. Evaluate Data for Screening Potential Risk Yes/No (determines next step)
Owner/Operator- As soon as possible

Status e.g. Pending or Complete	Date Completed	ACTION
		a. Screen existing data against relevant screening levels.
		b. Prepare RA Screening Report and submit it to the DEQ, OWMRP, for review as soon as possible but no more than 90 days after the incident.
		c. If less than screening levels, no further action is needed for off-site potential releases upon approval of the OWMRP.
		d. If the data is greater than screening levels, proceed immediately to Step 7.0, after notification from the DEQ.

Comments:

7. If Needed, Conduct Off-Site RCRA RFI and Prepare Full RA Report - *Owner/Operator*
(Steps 7.b. through 7.c. to be completed within 180 davs. if at all possible)

Status e.g. Pending or Complete	Date Completed	ACTION
		a. Prepare off-site RFI Work Plan and submit it for review to the OWMRP. Submit within 30 days from step 6.d. notification from the DEQ.
		b. Commence RFI immediately after DEQ approval of step 7.a. RFI Work Plan.
		c. Conduct a RA on RFI data.
		d. Prepare and submit RFI Report to the OWMRP.
		e. Upon DEQ approval of the RFI, prepare a combined CMS and CMI Plan, and submit for review to the OWMRP, if directed.
		f. Upon DEQ approval of the CMS/CMI, implement the CMI Plan as directed.
		g. Provide a report to the DEQ upon completion of the CMI Plan.

Comments: