

A.6. Preparedness/prevention or waiver

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

This document is an attachment to the Michigan Department of Environmental Quality's *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities*. See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), R 299.9504, R 299.9508, and R 299.9606 and Title 40 of the Code of Federal Regulations (CFR) §§264.30 through 264.37 establish requirements for preparedness for and prevention of releases of hazardous wastes or constituents at hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This license application template addresses requirements for preparedness for and prevention of releases of hazardous wastes or constituents at the following hazardous waste management facility for the Wayne Disposal, Inc. in Belleville, Michigan.

(Check as appropriate)

Applicant for Operating License for Existing Facility:

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

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

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

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INTRODUCTION

(R 299.9606 and 40 CFR §264.31).

Wayne Disposal Inc. (WDI) is designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of Hazardous Waste constituents to air, soil, or surface water which could threaten human health or the environment. For each area on-site where hazardous waste is managed, the potential hazards have been identified, then minimized or controlled as shown in Table 1. The actions to be taken in an emergency, regardless of cause (tornado, vehicle malfunction, airplane crash, etc.) are outlined in the Site 2 (MDWTP/WDI) facility Contingency Plan.

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

Buildings and containment areas are constructed of materials that have a decreased combustibility potential and are all designed with sloped secondary containment structures. Containment structure volumes adequately contain 25-year, 24 hour storm and can appropriately manage the permitted storage volumes. Waste received at WDI is evaluated utilizing pre-approval and waste screening procedures identified in Attachment A2 Chemical and Physical Waste Analysis Plan in order to minimize the possibility of an adverse reaction. WDI does not accept waste characteristically hazardous for reactivity or ignitability.

Unloading operations are completed in well maintained paved areas in order to ensure secure movement of containers. Additionally, WDI is equipped with a mechanical ramp that allows the forklift to safely remove containers from drum trailers.

The actions to be taken in an emergency, regardless of cause are outlined in the Contingency Plan.

A6.A REQUIRED EQUIPMENT

[R 299.9606 and 40 CFR §264.32]

MDWTP and WDI have been equipped with the following:

- (a) An internal communications system (e.g., radio, phone) capable of providing immediate emergency instruction to facility personnel.
- (b) A telephone system capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams.
- (c) Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and
- (d) Water at adequate volume and pressure to supply water hose streams.

A6.A.1 Internal Communication System

[R 299.9606 and 40 CFR §264.32(a)]

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

A6.A.2 Emergency Response Communication System
[R 299.9606 and 40 CFR §264.32(b)]

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

A6.A.3 Fire, Spill, and Decontamination Equipment
[R 299.9606 and 40 CFR §264.32(c)]

Fire Extinguishers

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

Spill Control and Decontamination Equipment

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

A6.A.4 Adequate Water Volume
[R 299.9606 and 40 CFR §264.32(d)]

The municipal water supply provides adequate pressure and volume to operate the site's fire protection systems.

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

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

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

- (a) Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation have immediate access to an emergency communication device, either through visual, voice contact, or radio with another employee.
- (b) While the facility is operating, employees have immediate access to a telephone or a radio for summoning external emergency assistance or the Emergency Coordinator.

A6.C(1) Multiple Employees Present
[R 299.9606 and 40 CFR §264.34(a)]

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

A6.C(2) Single Employee Present
[R 299.9606 and 40 CFR §264.34(b)]

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

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

Aisle space requirements are outlined in attachment C.1 Containers

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

These arrangements are outlined in the Contingency Plan.

A6.E.1 Arrangements with State and Local Authorities
[R 299.9606 and 40 CFR §264.37(a)(1)]

These arrangements are outlined in the Contingency Plan.

A6.E.2 Refusal of State or Local Authorities to Enter into Emergency Response Agreements
[R 299.9606 and 40 CFR §264.37(b)]

Participation letters are mailed to all state and local authorities along with a copy of the Contingency Plan. Refusals are documented, if received.