ATTACHMENT 4

CONTINGENCY PLAN

GLOSSARY

Effective April 22, 2019, the Michigan Department of Environmental Quality (DEQ), Waste Management and Radiological Protection Division (WMRPD), became the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD).

40 CFR	Title 40 of the Code of Federal Regulations
ABR	Adopted by reference
Act 207	Michigan Fire Protection Act, PA 207, as amended
Act 451	Natural Resources and Environmental Protection Act, 1994 PA 451, as amended
Dynecol	former name of facility, now known as US Ecology Detroit North, Inc US Ecology Michigan?
EPA	United States Environmental Protection Agency
HWSA	Hazardous and Solid Waste Amendments of 1984
Part 111	Part 111, Hazardous Waste Management, of Act 451
Part 111 Rules	Administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Act 451
R	Rule (example: R 299.9504)

FORM EQP 5111 ATTACHMENT TEMPLATE MODULE A7
CONTINGENCY PLAN

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), R 299.9501, R 299.9508(1)(b), R 299.9504(1)(c), R 299.9521(3)(b), R 299.9607, and Title 40 of the Code of Federal Regulations (CFR) §§264.50 through 264.56, and 270.14(b)(7), establish requirements for contingency plans at hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.
This license application template addresses requirements for a contingency plan at the hazardous waste management facility for the US Ecology Michigan in Detroit, Michigan. It is recommended that US Ecology Michigan perform annual drill exercises with the local fire department and emergency responders using the contingency plan to make sure all staff are familiar with the plan and determine whether the plan needs any updating.

(Check as appropriate)

☐ Applicant for Operating License for Existing Facility

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

This template is organized as follows:

INTRODUCTION

A7.A BACKGROUND INFORMATION

A7.A.1 Purpose of the Contingency Plan
[R 299.9607 and 40 CFR §§264.51 and 264.53]

This Contingency Plan has been prepared in accordance with the requirements of 40 CFR, Part 264, Subpart D, and R 299.9607. It is designed to establish the necessary planned procedures to be followed in the event of an emergency situation at the US Ecology Michigan facility in Detroit, Michigan, such as a fire, explosion, or any unplanned sudden or nonsudden 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:

Mr. Harold Watkins, Jr.
Detroit Fire Department
Fire Marshall Division
250 W. Larned Street
Detroit, MI 48226
(313) 596-5196

Lt. Gloria Clayton
Detroit Police Department
Precinct #11
5100 Nevada
Detroit, MI 48211

The local hospital and clinic have been contacted to familiarize each with the properties of wastes or other materials which are handled at US Ecology Michigan. MSDSs, outlining the potential hazards of these materials, have been submitted to:

Concentra Medical Centers
2630 East Jefferson Ave.
Detroit, MI 48207
Att: Ms. Sandra Gruca

St. John's Northeast Community Hospital
4777 East Outer Drive
Detroit, MI 48234
Att: Mr. Scott Berkseth

Appendix A7.1 includes documentation that each of these agencies has received a copy of the

Contingency Plan. Whenever the Contingency Plan is modified, the facility will provide the agencies with a copy of the modified plan.

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 via the public sewer system. The procedures established in this plan have been developed to protect Dynecol employees, properties, and the general public and will be implemented by plant personnel in the event of a potential or actual release of hazardous wastes or hazardous waste constituents which may threaten human health or the environment.

Dynecol, Inc. is located at 6520 Georgia Street in Detroit, Michigan. The facility treats and stores a wide range of hazardous wastes. Figure A1-4 contains a general site plan of Dynecol, illustrating the locations used in treatment and/or storage of hazardous wastes. Also refer to Module A1 for more detailed site description. Waste Codes are provided in Tables A2-1 and A2-2.

A7.A.3 Identification of Potential Situations

The provisions of this plan will be carried out whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, that could threaten human health or the environment.

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]

All Emergency Coordinators are fully qualified to serves as Emergency Coordinators. Their job descriptions and training and certification requirements are provided in Module A10 and Tables A10-1 through A10-3. See Appendix A7-2 for qualifications of the emergency coordinators.

They are knowledgeable of the facility’s operations and activities, and how these operations and activities are impacted by RCRA obligations.

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

US Ecology Michigan, Inc.
6520 Georgia Street, Detroit, Michigan

Priority	Name	Address	Work Phone	Home Phone	Cell (optional)
Primary Coordinator	Rick Meirow	22470 Alexander, St. Clair Shores, MI 48081	313-571-7141		313-580-4007
First Alternate Coordinator	Raymond Landsberg	610 W. Boston Blvd., Detroit, MI 48202	313-347-1313		313-384-5834
Second Alternate Coordinator	Terry Howes	13444 Belle River Road, Riley, MI 48041	313-571-7141		586-212-8444

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

If an emergency situation develops at the facility, the discoverer must immediately contact the primary Emergency Coordinator or the alternate Emergency Coordinator if the primary Emergency Coordinator is unavailable. The primary and alternate Emergency Coordinators are thoroughly familiar will all aspects of the facility's contingency plan, all operations and activities of the facility, the location of all records within the facility, and the facility layout. The Emergency Coordinators have complete authority to commit resources of the company that may be needed to carry out the

Contingency Plan. The Emergency Coordinator's responsibilities are specified under the emergency response procedures contained in this plan.

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

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

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

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.

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 liquids or spray.
- The spill or release cannot be immediately transferred to an appropriate tank 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 facility personnel and the emergency coordinator in order to efficiently respond to the release of hazardous waste or hazardous waste constituents that could threaten human health or the environment. The facility's procedure for assessing offsite risk during and after a significant release is provided in 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.

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

All emergencies require prompt and deliberate action. In the event of any major emergency, an established set of procedures will be followed. These procedures (see below sections) 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. In the event of an 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.

A7.D.2 Procedures to Be Used for Identification of Releases
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

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 plant personnel who discover the situation will activate the emergency alarm system, thereby alerting the Emergency Coordinator (or designate who can then contact the Emergency Coordinator by telephone).
- The Plant personnel record the location, type, source, amount, and extent of releases to the Emergency Coordinator.
- 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 acids or alkalis, plant 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 or 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.
- All emergency response personnel will utilize PPE 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 plant evacuation is indicated, the evacuation procedures summarized in Appendix A7-3 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 buildup, 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 or water hoses 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.
- All measures will be undertaken to prevent the contact of any released materials with incompatible materials (e.g. corrosive material with water, skin, eyes, and metals and flammable materials with any spark emitting sources or open flames).
- Released materials that are not contained will be prevented from entering any floor drains, such as through the use of oil booms or dams and inert absorbent materials. The release of corrosive materials will be cautiously and slowly neutralized (acids with an alkaline compound and alkaline solutions with a dilute acidic material). Spark-proof equipment will be used to remove flammable materials.
- If necessary, the area will be roped off to limit access to the area until the emergency has been cleared and the area cleaned. Ventilation will be provided to the area if indicated by the presence of vapor-emitting materials, such as acids or volatile compounds.
- 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, corrosion, or explosion.
- For emergency situations involving drums or 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 or 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.

A7.D.3 Procedures to Be Used to Assess Potential Hazards to Human Health and the Environment

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

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

The Emergency Coordinator may use the waste characterization information, information on health effects of the chemical(s) involved, information on environmental impacts of the chemical(s) involved, input from Expertise Centers (e.g., Reactive Chemicals, Industrial Hygiene, etc.), the expected duration of the emergency, and meteorological information to assess the impact of the emergency. Action will be taken, based on this assessment, to contain and mitigate the potential impact of the emergency. Additional action may be taken, as deemed necessary, to evacuate downwind areas or notify outside agencies of such other actions as may be necessary to protect human health and the environment.

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

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]

You must identify the procedures that the emergency coordinator will use to determine whether evacuation is necessary and how appropriate agencies will be notified.

If the emergency coordinator's assessment indicates that evacuation of facility areas may be advisable, he will implement the evacuation plan for the facility. If the emergency coordinator's assessment indicates that evacuation of the surrounding local areas is also advisable, the appropriate local authorities will be immediately notified (see 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 A7-3 and Figure A6-1.

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 following procedures:

Whenever there is an imminent or actual emergency situation, all operations and processes will be ceased.

If after assessing the situation as indicated in Sections A7.D.3 and A7.D.4, the emergency response coordinator judges that additional control measures may be taken without undue risk to the responders, the Facility may take the following actions for:

- Potential Fires/Explosions
  In the case where there is a potential for a fire, Facility personnel will be directed by the Emergency Response coordinator to take immediate action to assure that all source of ignition are eliminated (i.e. forklifts, electrical equipment, etc.). Vehicular traffic and waste processing will cease until safe conditions have been restored.

- Spills/Material Releases

  These emergencies that require implementation of the Contingency Plan will be controlled by erecting barricades, then intercepting and collecting the spilled material to minimize the affected area.

  Since all areas where containers of hazardous waste are stored, all loading/unloading activities involving hazardous waste and all entry/exit points to the active portion of the facility have containment berms, the possibility of a spill with a resultant material release should be rather small.

  A spill from a tank, portable container or pack will be contained by spreading appropriate material to contain the spill and prevent spreading. The appropriate absorbent for the waste may be determined by consulting the waste characterization for that material. The liquid portion of the spilled material will then be collected into tanks or available containers. The solid portion will be collected in containers.

  In the event of a release of material which creates a vapor explosion hazard or which is likely to cause odor complaints from outside the facility, the spill will be contained and blanketed with foam or liquid, or otherwise managed, to minimize the evolution of flammable vapors or odors.

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

- Shut off pumps, valves, or air supply lines if required to stop the releases;
- Actuate sump pumps to transfer accumulated runoff into available tanks;
- Place portable pumps in service to transfer accumulated runoff;

- Deploy soda ash or suitable containment materials to erect temporary dams in the path of the flow of released materials; and
- Spread suitable neutralizing agents on contained spills.

Table A6-1 is a detailed description of the type, amount, and location of all emergency equipment at the US Ecology facility.

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

Local:

Spill Cleanup Contractors
HM Environmental
Services, Inc.
287 North Wilson Blvd.
Mt. Clemens, MI 48043 — **Phone:** (810) 469-0041

Marine Pollution Control
8631 West Jefferson Avenue
Detroit, MI 48209 — **Phone: (313) 849-2333**

Fire or Police 911 — **Phone:** (911)

Medical Emergency

Concentra Medical Centers — **Phone:** (313) 259-7990

St. John's Northeast
Community Hospital — **Phone:** (313) 369-9100

Great Lakes Water Authority
Industrial Waste Control Division — **Phone:** (313) 297-5828

System Control — **Phone:** (313) 224-4775

Notifications — **Phone:** (313) 833-0075

City of Detroit
Homeland Security and Emergency Management — **Phone:** (313) 596-2590

State:

Michigan Department Environment Great Lakes, and Energy

Spill Response (PEAS) — **Phone:** (800) 292-4706
Warren District Office — **Phone:** (734) 953-1401
Detroit Field Office — **Phone:** (313) 392-6524
SE Michigan Air Quality Division — **Phone:** (313) 456-4700

National Response Center: — **Phone:** (800) 424-8802

Federal Agencies: EPA Region 5 — **Phone:** (800) 621-8431

Other Agencies:

U.S. Coast Guard

Business Hours	**Phone:** (313) 568-9470
Evening Hours	**Phone:** (313) 568-9464
Poison Control Center:	**Phone:** (800) 462-6644
	Phone: (313) 745-5711

Table A6-1 is a detailed description of the type, amount, and location of all emergency equipment at the US Ecology Michigan facility.

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)]

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. Daily inspections, high level alarms, overflow protection, and pressure relief valves (if present) will be used to monitor equipment for leaks, pressure buildup, gas generating or ruptures in valves, pipes, or other equipment should the facility operations cease.

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 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 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 characteristics, then the cleanup materials, spill residues, and other contaminated materials must be managed as hazardous wastes if these materials also possess the hazardous waste characteristics as defined under RCRA or Act 451. Analytical testing may have to be undertaken in order to make this determination.
- If a container holding hazardous waste is not in good condition or it begins to leak, the hazardous 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.
- Any spill or leak from the treatment or storage tanks will be contained within the secondary containment structures that have been provided for each tank.

The Emergency Coordinator will ensure that no wastes which may be incompatible with the released materials are treated, stored, or disposed of until cleanup procedures are completed.

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

After an emergency event, all emergency equipment listed in Table A6-1 will be replaced or decontaminated and thoroughly cleaned so that it is fit for use. Before operations are resumed, an inspection of all safety equipment will be conducted as discussed in Module A5. The U.S. EPA Regional Administrator, the MDEQ, 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.

Decontamination equipment and personal safety equipment are provided at the facility as follows: emergency showers and eyewash stations located at the south wall of the truck washout area, at the south side of the scrubber in Building 2, at the east wall of the press building (upper level), in the CMF (by the loading/unloading area, the bulk/transfer area, and bay #1), at the truck unloading pad, and in the primary treatment area; and two Scott air packs with a 30 minute air supply located on the north wall of the employee lunch area. Personal full/half faced respirators are kept individually by employees in their lockers.

Repairs, major repairs, replacement and closure of tanks are conducted in accordance with 40 CFR 264.196.

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), US Ecology Michigan 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 US Ecology Michigan and can be found at the following location: 6520 Georgia Street, Detroit, MI 48211.

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

Within 15 days of an incident requiring implementation of the Contingency Plan, the US Ecology Michigan facility will submit a written incident report to the DEQ at the following address:

Chief of the Office of Waste Management and Radiological Protection
Department of Environmental Quality
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

1.a If possible, 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 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.

Record Incident Parameters

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

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 on-site 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

4.a Identify all of 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 off-site 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 the DEQ.

Post-Incident Sample Collection

5.a 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, off-site sampling may not be necessary based on air monitoring data and lack of off-site 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

6.a Compare existing data to relevant environmental protection standards.

6.b Prepare risk assessment report and submit it to the DEQ, Office of Waste Management and Radiological Protection (OWMRP) within 90 days after the incident.

6.c If less than environmental protection standards, no further action is needed for off-site 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 the DEQ.

Corrective Action

Perform corrective action based on results of information gathered in previous steps in accordance with Part VII, *Corrective Action Information, of this license.*

A checklist is provided for in Appendix A7.4.

Any of the actions incorporated into this procedure are to be performed by US Ecology Michigan 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 US Ecology Michigan .

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 Emergency Coordinator deems necessary and/or of one of the following conditions is met:

- 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; or
- The list of emergency equipment changes.

Appendix A7.1: Documentation of Arrangements with Local Authorities

Appendix A7.2: Emergency Equipment Description

Appendix A7.3: Evacuation Plan and Routes

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

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

November 10, 2005

CERTIFIED MAIL

Ms. Molly A. Dwinnells
Manager of Regulatory Affairs
Dynecol, Inc.
6520 Georgia Street
Detroit, Michigan 48211

Dear Ms. Dwinnells:

SUBJECT: Minor License Modification Acknowledgement; Dynecol, Inc. (Dynecol), Detroit, Michigan; MID 074 259 565

Thank you for your October 10, 2005, letter to Mr. Richard Conforti of the Waste and Hazardous Materials Division (WHMD), Department of Environmental Quality (DEQ), transmitting an updated copy of Dynecol's contingency plan. The modifications addressed changes to the emergency site plan portion of the contingency plan to reflect relocation of emergency equipment and revised evacuation routes due to the installation of the recently permitted wastewater treatment equipment.

Based on a review of the modifications, current license, and administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, the WHMD has determined that the modifications constitute minor modifications that do not require the DEQ Director's prior approval. Specifically under R 299.9519(5)(b)(vii), a change in the contingency plan to reflect the relocation of emergency equipment listed in the contingency plan is a minor license modification that does not require prior written approval from the DEQ. The WHMD hereby acknowledges receipt of the updated contingency plan.

In accordance with R 299.9519(6), Dynecol must send notice of the minor license modification to the facility mailing list within 90 days after the changes are put into effect. The names and addresses on the mailing list are enclosed.

Should you require further information of a technical nature, please contact Mr. Conforti, of the Hazardous Waste Section, WHMD, at 517-241-2108.

Sincerely,

George W. Bruchmann, Chief
Waste and Hazardous Materials Division
517-373-9523

Enclosure
cc/enc: Ms. De Montgomery, DEQ
Mr. Steve Buda, DEQ
Ms. Jeanette Noechel, DEQ
Mr. Richard Conforti, DEQ
OL File

SENDER: COMPLETE THIS SECTION

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1. Article Addressed to:

Mr. Dennis Heine
287 N. Wilson Blvd.
Mount Clemens, Michigan 48083

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Jennifer Greene ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery 10-24-05

D. Is delivery address different from item 1? ☐ Yes
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1. Article Addressed to:

Mr. Scott Berkseth
St. John's NorthEast Comm. Hospital
477 East Outer Drive
Detroit, Mi 48234

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X ☐ Agent ☐ Addressee

B. Received by (Printed Name)

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MT ELLIOTT STA 48234-9 USPS OCT 24 2005

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1. Article Addressed to:

Mr. Richard Walsh
Inland Waters Pollution
2021 South Schaefer Highway
Detroit, Michigan 48217

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X ☐ Agent ☐ Addressee

B. Received by (Printed Name)
ROB BAUM

C. Date of Delivery 10-22-05

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

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☒ Certified Mail ☐ Express Mail
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1. Article Addressed to:

Ms. Sandra Gruca
Concentra Medical Centers
2151 East Jefferson
Detroit, Michigan 48207

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

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

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

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number
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1. Article Addressed to:

Ms. Jeanette Noechel
Michigan Department of Env. Quality
Waste Management Division
27700 Donald Court
Warren, Michigan 48092-2793

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) | C. Date of Delivery 10245

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

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number
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1. Article Addressed to:

Mr. Harold Watkins
Detroit Fire Department
Fire Marshall Division
250 W. Larned Street
Detroit, Michigan 48226

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X S. Smith ☐ Agent ☐ Addressee

B. Received by (Printed Name) S. SMITH | C. Date of Delivery 10-24-05

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

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number
(Transfer from service label) 7001 2510 0008 9247 3115

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

1. Article Addressed to:

Mr. Richard Conforti
Michigan Department of Env. Quality
Remediation and Redevelopment Division
Constitution Hall
Atrium North
525 W. Allegan Street
Lansing, Michigan 48933

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X ☐ Agent ☐ Addresse

B. Received by (*Printed Name*) C. Date of Deliver

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

JEREMY HALL
MAIL & DELIVERY SERVICES, AGENT FOR STATE OF MICHIGAN
OCT 24 2005
POST OFFICE BOX 30026
LANSING, MICHIGAN 48909

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandis
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (*Extra Fee*) ☐ Yes

2. Article Number
(*Transfer from service label*) 7001 2510 0008 9247 3061

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US ECOLOGY MICHIGAN (DETROIT NORTH), INC.
6520 GEORGIA STREET
DETROIT, MI 48211
MID074259565

SECTION G

CONTINGENCY PLAN

This Contingency Plan has been prepared in accordance with the requirements of 40 CFR 270.14(b)(7), 264 Subpart D and Michigan Act 451 to establish the necessary planned procedures to be followed in the event of an emergency situation at the facility, such as fire, explosion, severe weather, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or surface water.

As required by 40 CFR 264.53, and Act 451, a copy of this Contingency Plan (and all amendments to the plan) is maintained at the facility and has been submitted to the local police department, fire department, and local emergency response teams that may be called upon to provide emergency service.

GENERAL INFORMATION 40 CFR 264.51

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 via the public sewer system. The procedures established in this plan have been developed to protect US Ecology Michigan employees, properties, and the general public and will be implemented by plant personnel in the event of a potential or actual release of hazardous wastes or hazardous waste constituents which may threaten human health or the environment.

US Ecology Michigan is located at 6520 Georgia in Detroit, Michigan. The facility treats and stores a wide range of hazardous wastes. Figure G.1 contains a general site plan of US Ecology Michigan, illustrating the locations used in treatment and/or storage of hazardous wastes.

EMERGENCY COORDINATORS 40 CFR 264.52(d) 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 Emergency Coordinators is contained in Table G. 1. Qualified persons have been designated as the primary and alternate Emergency Coordinators. Their names, addresses, and telephone numbers are arranged in the order in which they would assume the responsibilities of Emergency Coordinator.

If an emergency situation develops at the facility, the discoverer must immediately contact the primary Emergency Coordinator or the alternate Emergency Coordinator if the primary Emergency Coordinator is unavailable. The primary and alternate Emergency Coordinators are thoroughly familiar will all aspects of the facility's contingency plan, all operations and activities of the facility, the location of all records within the facility, and the facility layout. The Emergency Coordinators have complete authority to commit resources of the company that may be needed to carry out the Contingency Plan. The Emergency Coordinator's responsibilities are specified under the emergency response procedures contained in this plan.

Table G. 1
Emergency Notification Telephone Numbers

1. Emergency Coordinators

Name/Address	Office Phone	Cell Phone	Home
Primary Coordinator Rick Meirow 22470 Alexander St. Clair Shores, MI 48081	(313) 571-7141	(313) 580-4007	
1st Alternate Raymond Landsberg 610 W. Boston Blvd. Detroit, MI 48202	(313) 347-1313	(313) 384-5834	
2nd Alternate Terry Howes 13444 Belle River Rd. Riley, MI 48041	(313) 571-7141	(586) 212-8444	

2. Spill Cleanup Contractors

HM Environmental Services, Inc. 287 North Wilson Blvd. Mt. Clemens, MI 48043	(586) 469-0041
Marine Pollution Control 8631 West Jefferson Avenue Detroit, MI 48209	(313) 849-2333

3. Fire or Police

911

Table G. 1
Emergency Notification Telephone Numbers
Continued

4. Medical Emergency

First Choice Urgent Care	(313) 438-6094
Detroit Receiving Hospital	(313) 745-3374

5. Great Lakes Water Authority

Industrial Waste Control Division	(313) 297-5828
System Control	(313) 224-4775

6. EGLE Southeast MI Air Quality Division

Notifications	(313) 456-4700

7. Michigan Department of Environment, Great Lakes, and Energy

Spill Response (PEAS)	(800) 292-4706
SE Michigan Field Office	(586) 753-3700
Detroit Field Office	(313) 456-4700

8. U.S. Environmental Protection Agency

National Response Center	(800) 424-8802

9. U.S. Coast Guard

Business Hours	(313) 568-9470
Evening Hours	(313) 568-9464

10. Poison Control Center

	(800) 462-6644
	(313) 745-5711

G-3 IMPLEMENTATION OF CONTINGENCY PLAN 40 CFR 264.51 (b) and 264.56(d)

The decision of the Emergency Coordinator to implement this plan depends upon whether or not the potential or actual incident could threaten human health or the environment. The following situations are provided as guidance to plant personnel as to 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.

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 liquids or spray.
- The spill or release cannot be immediately transferred to an appropriate tank for storage.
- The spill or release threatens the integrity of storage tanks or other facility equipment or structures.

G-4 EMERGENCY RESPONSE PROCEDURES

The following general procedures have been established for implementation by plant personnel and the Emergency Coordinator in order to efficiently respond to the release of hazardous waste or hazardous waste constituents which 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.

G-4a Notification

The list of emergency contacts contained in Table G.1 provides a ready reference for plant personnel and Emergency Coordinators in the event of an imminent or actual emergency situation at the facility which will require immediate response. In the event of an 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.

G-4b Identification of Hazardous Materials 40 CFR 264.56 (b)

The Emergency Coordinator will immediately identify the type, exact source, amount and extent of any release materials. The Emergency Coordinator is familiar with the facility and the types of wastes which are handled. The initial identification will be made by observation of the materials 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.

G-4c Assessment 40 CFR 264.56 (c) and (d)

The Emergency Coordinator will assess possible hazards, both direct and indirect, to human health or the environment that may result from the release of the identified material or from the 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 the fire, and the effects of any chemical or physical reactions on equipment or structures. If the Emergency Coordinator's assessment indicated that evacuation of 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 G.1) will also be immediately notified, and the following information will be provided:

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

G-4d 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 plant personnel who discover the situation will activate the emergency alarm 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 acids or alkalis, plant 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 or 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.
- 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 plant evacuation is indicated, the evacuation procedures summarized in Section G-7 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 or water hoses 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.

- All measures will be undertaken to prevent the contact of any released materials with incompatible materials, such as; corrosive material with water, skin, eyes, and metals and flammable materials with any spark emitting sources or open flames.
- Released materials that are not contained will be prevented from entering any floor drains, such as through the use of oil booms or dams and inert absorbent materials suitable to be released materials. The release of corrosive materials will be cautiously and slowly neutralized (acids with an alkaline compound and alkaline solutions with a dilute acidic material). Spark proof equipment will be used to remove flammable materials.
- If necessary, the area will be roped off to limit access to the area until the emergency has been cleared and the area cleaned. Ventilation will be provided to the area if indicated by the presence of vapor-emitting materials, such as acids or volatile compounds.
- 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 element the potential for leakage, corrosion or explosion.
- For emergency situations involving drums or 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 or 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.

G-4e Prevention of Recurrence or Spread of Fires, Explosions or Releases
40 CFR 264.56 (e)

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

- Shut off pumps, valves, or air supply lines if required to stop the releases;
- Actuate sump pumps to transfer accumulated runoff into available tanks;
- Place portable pumps in service to transfer accumulated runoff;
- Deploy soda ash or suitable containment materials to erect temporary dams in the path of the flow of released materials; and
- Spread suitable neutralizing agents on contained spills.

G-4f Storage and Treatment of Released Materials 40 CFR 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 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 characteristics, then the cleanup materials, spill residues, and other contaminated materials must be managed as hazardous wastes if these materials also possess the hazardous waste characteristics as defined under RCRA or Act 451. Analytical testing may have to be undertaken in order to make this determination.

G-4g Incompatible Wastes 40 CFR 364.56 (h) (1)

The Emergency Coordinator will ensure that no wastes which may be incompatible with the released materials are treated, stored, or disposed of until cleanup procedures are completed.

G-4h Post-Emergency Equipment Maintenance 40 CFR 264.56 (h) (2)

After an emergency event, all emergency equipment listed in Section G-5 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 Section F-2. 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.

G-4i Container Spills and Leakage 40 CFR 264.171

Refer to Section G-4d for a detailed description of the emergency response procedures for container spills and leakage. If a container holding hazardous waste is not in good condition or it begins to leak, the hazardous 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.

G-4j Tank Spills and Leakage 40 CFR 264.194

Refer to Section G-4d for a detailed description of the emergency procedures for tank spills and leakage. Any spill or leak from the treatment or storage tanks will be contained within the secondary containment structures that have been provided for each tank.

G-5 EMERGENCY EQUIPMENT 40 CFR 264.32 and 264.52

G-5a Internal Communication

Internal communication is provided by means of the facility telephone and paging systems and portable two-way radios. An internal alarm system capable of providing immediate emergency signals to facility personnel are available on site. The locations of the alarm actuators are indicated in Table G.2.

G-5b External Communication

External communication is also provided through the facility telephone system (as described in Section G-5a above).

G-5c Access to Communication and Alarm Systems

All facility personnel have prompt access to the internal alarm system actuator buttons and telephone system since they are located in areas where personnel would be carrying out their duties.

G-5d Emergency Equipment

Portable fire extinguishers (classified for Class A, B, and C fires with capacity of 20 pounds) are located throughout the facility. Their locations at the facility are summarized in Table G.2 and illustrated in Figure G.2.

Table G.2
Emergency Equipment 40 CFR 264.52 (e)

Item	**Location**
Alarm Actuators	
1	Office Area
1	Compressor Building Outside
1	Top of Primary Treatment tanks
1	Bottom of Primary Treatment tanks
1	Unloading Pad
2	Inside Building 2
1	Secondary Treatment Building-east wall
1	Treatment Plant Radio Room (Main shut-off)
2	CMF
Fire Extinguishers	
2	Office Area
3	Truck Washout Building
3	Building 2
1	Diesel Fuel Tank area
6	CMF
2	Compressor Building
Water Supply for Fire Control	
1" Valve	Truck Washout Building
1" Valve	Secondary Treatment Building
1" Valve	Building 2
1" Valve	CMF
2" Valve	Building 2
2" Valve	Press Building
2" Valve	Secondary Treatment Building
2" Valve	Primary Treatment
2" Valve	Unloading Pad
3" Valve	Primary Treatment Building

Portable spill control equipment and materials include:

- Soda ash bags or drums stored in Building #3;
- Portable gasoline powered and/or air powered diaphragm pumps and related hosing and couplings stored in Building #3;
- Shovels and squeegees kept at various areas within the facility; and
- Spill control kit stored in CMF.

Decontamination

Decontamination equipment and personal safety equipment are provided at the facility as follows: emergency showers and eyewash stations located at the south wall of the truck washout area, at the south side of the scrubber in Building 2, at the east wall of the press building (upper level), in the container management building (by the loading/unloading area, the bulk/transfer area, and bay #1), at the truck unloading pad, and in the primary treatment area; and two Scott air packs with a 30 minute air supply located on the north wall of the employee lunch area. Personal full/half faced respirators are kept individually by employees in their lockers.

G-5e Water for Fire Control

Water is provided to the facility from the City of Detroit water supply mains, and enters the facility at a pressure of 50-60 psi. Water supply is available within the facility at the locations indicated in Table G.2. Water hoses and couplings are available at the facility and are accessible for immediate use. The container management facility is equipped with an automatic, foam-water, closed head sprinkler system that is supplied by an eight-inch water main with water pressure less than 60 psi. The capacity is 0.30 gpm/sf plus an allowance of 750 gpm for fire department uses.

G-5f Aisle Space Requirements

Access into the facility and movement within the facility is maintained free and clear of obstructions in order to allow free movement of personnel, emergency and /or fire protection equipment, and spill control/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 for the same purposes as described earlier.

G-5g Emergency Equipment Inspection and Maintenance

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. Section F provides more details regarding inspection schedules and procedures.

G-6 COORDINATION AGREEMENTS 40 CFR 264.52 © and 264.37

Copies of the Contingency Plan are provided to emergency response agencies in order to familiarize them with the facility layout, the properties of materials handled, locations of working areas, access routes into and within the facility, possible evacuation routes from the facility, and types of injury or illness which could result from releases of materials at the facility.

This information is submitted to:

Mr. Harold Watkins, Jr.
Detroit Fire Department
Fire Marshall Division
250 W. Larned Street
Detroit, MI 48226
(313) 596-5196

Lt. Gloria Clayton
Detroit Police Department
Northeastern District
5100 Nevada
Detroit, MI 48211

The local hospital and clinic have been contacted to familiarize each with the properties of wastes or other materials which are handled at US Ecology Michigan. Material safety data sheets, outlining the potential hazards of these materials, have been submitted to:

First Choice Urgent Care
23455 Michigan Avenue
Dearborn, MI 48124
Attn: Mike Pelz

Detroit Receiving Hospital
4201 St. Antione Blvd.
Detroit, MI 48201

Documentation that these organizations have received copies of this Contingency Plan or material safety data sheets can be found in Appendix G.1.

G-7 EVACUATION PLAN 40 CFR 264.52 (F)

The Emergency Coordinator is responsible for determining which emergency situations require plant evacuation. An audio alarm, portable two-way radios, and the facility telephone/paging system will be used to notify personnel as to the nature of the emergency and recommended plan of action. In the event that all reasonable measures fail to control the emergency situation or if human health or the environment outside the facility is threatened, the Emergency Coordinator will: Commence the signal for plant evacuation and notify employees, contractors, and visitors to evacuate the facility through exits determined to be safe at the time of the emergency (See Figure G.2 for evacuation routes and designated assembly areas);

Immediately direct that no further entry of visitors, contractors, or vehicles be permitted. All vehicle traffic movement within the facility will cease in order to allow the access of emergency equipment;
Disallow 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.

Supervisors will begin to prepare a list of employees present in the assembly areas and those individuals that should be but are not. Accounting for the presence of visitors will be the responsibility of the employees they are seeing. The accounting for the presence of contractors will be the responsibility of those personnel supervising the individual contracts. 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. Local emergency response agencies will be immediately contacted, and the Emergency Coordinator will assist these agencies if it is determined that it is necessary to initiate evacuation; and

Give a signal or other notification to indicate that the facility is safe and cleared for re-entry.

G-8 REQUIRED REPORTS [40 CFR 264.56 (i) and (j)]

- In the event of an emergency situation that requires implementation of the contingency plan, the Emergency Coordinator must make the following notifications:
- Record in the facility's operating record the time, date, and description of any incident that requires the implementation of this plan.
- Notify the EPA Regional Administrator and the EGLE Director that the facility has complied with the following provisions:
- No waste that may be incompatible with the released materials has been (or will be) stored, treated or disposed of until cleanup procedures have been competed.
- All emergency equipment listed in this plan has been (or will be) cleaned and fit for its intended use prior to resumption of operations.

Within 15 days after the incident, submit a written report to:

U.S. EPA Region 5
77 W. Jackson Boulevard
Chicago, IL 60604

Director
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30241
Lansing, MI 48909

This report must include the following information:

Name, address, telephone number of the facility and the owner or operator;
Date, time, type of incident;
Type and quantity of materials involved
Extent of injuries, if any;
Assessment of actual or potential hazards to human health or the environment; and
Estimated quantity and disposition of recovered material that resulted from the incident.

G-9 AMENDMENT OF THE CONTINGENCY PLAN 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; or
- The list of emergency equipment changes.

Table A6-1

Emergency Equipment 40 CFR 264.52 (e)

Item	Location
Alarm Actuators	
1	D.A.F Building
1	Compressor Building Outside
1	Top of Primary Treatment tanks
1	Bottom of Primary Treatment tanks
1	Unloading Pad
2	Inside Building 2
1	Secondary Treatment Building-east wall
1	Treatment Plant Radio Room (Main shut-off)
2	CMF
2	Building 4
2	Proposed Building 5A
1	Proposed Building 5B
Fire Extinguishers	
2	Office Area
5	Maintenance Garage
4	Building 2
1	Diesel Fuel Tank area
6	CMF
3	D.A.F Building
2	Compressor Building
1	Primary Treatment Building
8	Building 4
6	Proposed Building 5A
2	Proposed Building 5B

Water Supply for Fire Control

Valve Size	Location
1”	Garage building (by office door)
1”	Garage building (by south door)
2”	Garage building, south wall
1”	Compressor room
1”	Secondary treatment area, west wall
2”	Secondary treatment area, east wall
2”	Building 2, first level, east wall
2”	Building 2, first level, west wall
1”	Building 2, upper level, west wall

Table A6-1 (continued)

Emergency Equipment 40 CFR 264.52 (e)

Valve Size	Location
2”	Building 2, upper level, center
1”	Container management building
2”	Press building, east wall
2”	Top of primary area
2”	Truck unloading area
2”	Primary treatment area, east wall
1”	Dissolved air floating processing tank
2”	Lime unloading dissolved air floating

Portable spill control equipment and materials include:

- Air-driven diaphragm pumps along with appropriate hosing and couplings;
- Soda ash for spill neutralization purpose;
- Shovels and squeegees; and
- Absorbent pads/pillows/socks.

Note: Emergency equipment as required by 40 CFR 264.52(e) will be installed in Building 4, Proposed Building 5A and Building 5B during the actual design and construction phase. The information provided is only proposed and are subject to change with actual design and construction.

DYNECOL, INC.

PRESENTS THIS CERTIFICATE TO:

Rick Meirow

FOR ACHIEVING 8 HOURS OF ANNUAL REFRESHER TRAINING AS REQUIRED IN 29 CFR 1910.120

ON OCTOBER 25, 2006

Molly A. Dwinnells
Molly A. Dwinnells, CHMM
Dynecol, Inc.
Training Coordinator
6520 Georgia
Detroit, Michigan 48211
October 25, 2006

Certificate No: 9

Dynecol, Inc.

presents this certificate to

RICK MEIROW

Achieving 40 *hours of RCRA / MIOSHA Hazardous Waste Worker Training*

On 06/24/93 *Signed* ______________

Instructor

DYNECOL, INC.

PRESENTS THIS CERTIFICATE TO:

Terry Fultz

FOR ACHIEVING 8 HOURS OF ANNUAL REFRESHER TRAINING AS REQUIRED IN 29 CFR 1910.120

ON OCTOBER 25, 2006

Molly A. Dwinnells, CHMM
Dynecol, Inc.
Training Coordinator
6520 Georgia
Detroit, Michigan 48211
October 25, 2006

Certificate No: 3

Hazardous Waste Operations and Emergency Response

CERTIFICATE OF TRAINING

This certificate of training as required by the Hazardous Waste Operations and Emergency Response; Final Rule, as promulgated by the Occupational Safety and Health Administration on Monday, March 6, 1989 (54 FR 9294), certifies that

TERRY FULTZ SR.

an employee of Great Lakes Environemental Services, has completed the training and field experience specified in paragraphs (e)(1) through (e)(4) of 29 CFR 1910.120 (e) Training. The above named employee has received an initial training *(or 1910.120 (e)(9) Equivalent training)* of 40 hours and receives annually an additional 8 hours of refresher training as specified in 29 CFR 1910.120 (e)(8).

Andrea Lang
Health and Safety Specialist

Signature: Andrea G. Lang

Notarized By: Charles D. Frazho

CHARLES D. FRAZHO
Notary Public, Macomb County, MI
My Commission Expires Sept. 28, 1991

DYNECOL, INC.

PRESENTS THIS CERTIFICATE TO:

Don Wilson

FOR ACHIEVING 8 HOURS OF ANNUAL REFRESHER TRAINING AS REQUIRED IN 29 CFR 1910.120

ON OCTOBER 25, 2006

Molly A. Dwinnells, CHMM
Dynecol, Inc.
Training Coordinator
6520 Georgia
Detroit, Michigan 48211
October 25, 2006

Certificate No: 12

Dynecol, Inc.

presents this certificate to

DONALD WILSON

Achieving 40 *hours of RCRA / MIOSHA Hazardous Waste Worker Training*

On 06/24/93 *Signed* ____________
Instructor

DYNECOL, INC.

PRESENTS THIS CERTIFICATE TO:

Jim Carney

FOR ACHIEVING 8 HOURS OF ANNUAL REFRESHER TRAINING AS REQUIRED IN 29 CFR 1910.120

ON OCTOBER 25, 2006

Molly A. Dwinnells, CHMM
Dynecol, Inc.
Training Coordinator
6520 Georgia
Detroit, Michigan 48211
October 25, 2006

Certificate No: 4

SEMCOSH
HAZARDOUS WASTE WORKER TRAINING

This certifies that

James Patrick Carney

has completed the 24 hour course and examination on July 18, 1992

This course fulfills requirements under
the OSHA Standard for Hazardous Waste Operations and Emergency Response
(29CFR 1910.120)
Industrial Emergency Response, Operations Level

offered in cooperation with

Midwest Consortium for Hazardous Waste Worker Training

Under a grant from the National Institute of Environmental Health Sciences

Susan V. Hayes
Training Director

July 18, 1993
Expiration Date

Trainee Certification No: 1567

Certificate of Achievement

awarded by

EMERGENCY RESPONSE TRAINING CENTER

at

FINDLAY

THE UNIVERSITY OF FINDLAY

to

JAMES CARNEY

For Successful Completion Of

RCRA 16-HOUR HAZARDOUS WASTE MANAGEMENT WORKSHOP
1.6 CEU'S
JULY 30, 1992

J. Rodd Van Dyne
Director of Hazardous
Materials Programs

Jan P. Launder
Instructor

DYNECOL, INC.
6520 GEORGIA STREET
DETROIT, MI 48211
MI D074259565

Evacuation Plan and Routes

EVACUATION PLAN 40 CFR 264.52 (F)

The Emergency Coordinator is responsible for determining which emergency situations require plant evacuation. An audio alarm, portable two-way radios, and the facility telephone/paging system will be used to notify personnel as to the nature of the emergency and recommended plan of action.

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

- Commence the signal for plant evacuation and notify employees, contractors, and visitors to evacuate the facility through exits determined to be safe at the time of the emergency (See Figure A6-1 for evacuation routes and designated assembly areas);
- Immediately direct that no further entry of visitors, contractors, or vehicles be permitted. All vehicle traffic movement within the facility will cease in order to allow the access of emergency equipment;
- Disallow 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;
- Supervisors will begin to prepare a list of employees present in the assembly areas and those individuals that should be but are not. Accounting for the presence of visitors will be the responsibility of the employees they are seeing. The accounting for the presence of contractors will be the responsibility of those personnel supervising the individual contracts. 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. Local emergency response agencies will be immediately contacted, and the Emergency Coordinator will assist these agencies if it is determined that it is necessary to initiate evacuation; and
- Give a signal or other notification to indicate that the facility is safe and cleared for re-entry.

Appendix A7-4
Dynecol, Inc. - Detroit, Michigan
Part 111 Hazardous Waste Operating License
Checklist - Tracking Facility Response Actions during and after a Fire/Explosion Incident

The Contingency Plan (Module A7) and Dynecol's Emergency Response Plan establishes the procedures to be followed in the event of an emergency situation at the Dynecol facility in Detroit, Michigan. The Emergency Response Plan is not included in this permit application, however will be available upon request. See below for information on response actions for the Dynecol Facility.

1. Record Incident Parameters ***Owner/Operator - As soon as access is available to employees/witnesses***	
Dynecol Reference	**ACTION**
Module A7 - Contingency Plan, Section A7.D	(a.) Document the time the incident began and the duration of the overall event. Identify the specific location(s) where the incident began.
Module A7 - Contingency Plan, Section A7.D	(b.) Identify employees/witnesses having direct involvement or direct knowledge of the incident.
Module A7 - Contingency Plan, Section A7.D	(c.) Identify any relevant witnesses to the event.
Data from the weather station located at the Dynecol facility will be utilized during an incident.	(d.) Gather local meteorological data from the National Weather Service (point-specific data are available at the National Oceanic and Atmospheric Administration [NOAA] Web site) and any characteristics noted by personnel directly involved with the incident or recorded elsewhere.
2. Develop Event Narrative ***Owner/Operator - As soon as access is available to employees/witnesses***	
Dynecol Reference	**ACTION**
Module A7 - Contingency Plan, Section A7.D.2, and A7.E(2) & Appendix A7-3 and Table A6-1	(a.) Determine the sequence of events and time line leading up to and throughout the incident by reviewing with employees directly involved, other on-site peripheral witnesses (office staff, truck drivers, maintenance staff, etc.), and access other tools and resources, as available (automated data records, surveillance cameras, etc.).
Module A7 - Contingency Plan, Section A7.D.2	(b.) Identify specific event locations, materials, and equipment involved in the incident.
Module A7 - Contingency Plan, Section A7.E(2)	(c.) Identify and characterize, to the extent possible, the size and scope of the event.
3. 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***	

Appendix A7-4
Dynecol, Inc. - Detroit, Michigan
Part 111 Hazardous Waste Operating License
Checklist - Tracking Facility Response Actions during and after a Fire/Explosion Incident

Dynecol Reference	**ACTION**
Module A7 - Contingency Plan, Section A7.D.2and A7.E(2)	(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.
Module A7 - Contingency Plan, Section A7.D.2	(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.
Module A7 - Contingency Plan, Section A7.D.3	(c.) The Waste and Hazardous Materials Division (WHMD) shall identify the primary location where information and documents used to in previous steps 3.1 and 3.2 will be housed and ensure that information critical to response an activity is kept in that location.
4. Air Monitoring During Incident ***Owner/operator (if the facility is equipped with monitoring instruments), in combination with Federal (Environmental Protection Agency - EPA, National Oceanic and Atmospheric Administration - NOAA) and local hazmat response teams - As soon as can be mobilized***	
Dynecol Reference	**ACTION**
Derenzo and Associates will be subcontracted for Air Monitoring	(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.
Derenzo and Associates will be subcontracted for Air Monitoring	(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.
Derenzo and Associates will be subcontracted for Air Monitoring	(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., SUMMA canisters/Tedlar bags for volatile organic compounds released from ruptured tanks), and which ones will be readily available.

5. Post-Incident Sample Collection ***Owner/Operator, in combination with EPA, Michigan Department of Environmental Quality (MDEQ), Department of Community Health (DCH) - During and/or immediately following the incident***	
Dynecol Reference	**ACTION**
A Sampling and Analysis Plan (SAP) will be developed post-incident.	(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.
Sampling specifics will be covered in post-incident SAP.	(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.
6. Evaluate Data for Screening Potential Risk Yes/No (determines next step) ***Owner/Operator – As soon as possible***	
Dynecol Reference	**ACTION**
Sampling and reporting specifics will be covered in the post-incident SAP	(a.) Screen existing data against relevant screening levels.
	(b.) Prepare RA Screening Report and submit it to the MDEQ WHMD, 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 WHMD.
	(d.) If greater than screening levels, proceed immediately to Step 7.0, after notification from the MDEQ.

Appendix A7-4
Dynecol, Inc. - Detroit, Michigan
Part 111 Hazardous Waste Operating License
Checklist - Tracking Facility Response Actions during and after a Fire/Explosion Incident

7. If Needed, Conduct off-Site RCRA Facility Investigation (RFI) and Prepare Full Remedial Action (RA) Report - ***Owner/Operator (Steps 7.(b.) through 7.(c.) to be completed within 180 days, if at all possible***	
Dynecol Reference	**ACTION**
RFI Work Plan will be prepared post-incident if necessary.	(a.) Prepare off-site RFI Work Plan and submit for review to the WHMD. Submit within 30 days from step 6.(d.) notification from the MDEQ.
	(b.) Commence RFI immediately after MDEQ approval of step 7.1 RFI Work Plan.
	(c.) Conduct a RA on RFI data.
	(d.) Prepare and submit RFI Report to the WHMD.
Corrective Measures Study (CMS) and Corrective Measures Implementation (CMI) Plans will be prepared post-incident if necessary	(e.) Upon MDEQ approval of RFI, prepare a combined CMS and CMI Plan, and submit for review to the WHMD, if directed.
	(f.) Upon MDEQ approval of the CMS/CMI, implement the CMI Plan as directed.
	(g.) Provide a report to the DEQ upon completion of the CMI Plan.