

Clean Harbors Deer Trail, LLC  
Permit Attachment 4

## **CONTINGENCY PLAN**

### **I. PURPOSE AND GENERAL INFORMATION**

#### **I.A. General**

Procedures within this Contingency Plan outline appropriate response actions that will be taken by Facility personnel in the event of a fire, explosion, unplanned sudden release of hazardous waste or hazardous constituents to air, soil, or surface water, and for actions taken for non-sudden events that may endanger human health or the environment. This plan is reviewed as a part of the personnel training program, and the personnel specified in the personnel training program are required to be familiar with its content.

Copies of this Contingency Plan will be maintained on-site and will be submitted to the Adams County Mutual Aid Trust and to fire departments, hospitals and state and local emergency response agencies that may be called upon to respond in an emergency.

Verbal or voice mail notification to the Department will be made within 24 hours after implementation of the Contingency Plan per Permit Condition I.E.13.a.. Details of the incident requiring implementation will be documented in the Operating Record. A written report describing the incident and response actions will be submitted to the Department following the requirements of Permit Condition I.E.13.c.

#### **I.B. Amendments**

Amendments will be made to the Contingency Plan whenever

- The facility permit is revised;
- The plan is found to be deficient during an emergency;
- The facility changes its design, construction, operation, and/or its management policies and procedures relative to the maintenance of this plan;
- The Emergency Coordinator(s) changes; or
- The list of emergency equipment changes.

The Director of the Colorado Department of Health will review and approve any modifications to the Contingency Plan following the procedures in 6 CCR 1007-3 §100.63.

#### **I.C. Site Description**

The Facility is located in Adams County Colorado on U.S. Highway 36. The permit area of the facility is surrounded by an eight-foot chain link fence topped with barbed wire. A 0.8 mile access road which connects U.S. Highway 36 to the southwest corner of the site leads to a main access gate. A west contractor's gate is located 1380 feet south of the

northwest corner of the Permit Boundary Fence. An access/emergency exit gate is centrally located along the eastern Permit Boundary Fence. The Permittee shall control entry to the Facility at all times.

The Facility will offer the following industrial waste handling services:

- Treatment of hazardous waste;
- Secure landfill disposal of solid wastes and previously solidified materials meeting land disposal restrictions; and
- Container management.

#### **I.D. Emergency Equipment and Alarm Systems**

Appendix 1 to the Contingency Plan lists the emergency equipment that is available at the Facility for implementation of the responses required by the Contingency Plan. This appendix also lists the location of the equipment and the area of usage.

#### **I.E. Arrangements with local authorities**

- I.E.1. Local emergency response units will be contacted to assist in responding to a response situation at the discretion of the Emergency Coordinator and/or the General Manager. Otherwise on-site emergency response personnel will respond to the incident.
- I.E.2. The local cooperating agencies that could potentially be involved in a response at the Facility are listed in Appendix 2. Arrangements specify that individuals providing services must be properly trained to respond to a hazardous waste incident and will comply with proper decontamination procedures. Any injured personnel will be decontaminated to the extent practicable at the Facility before being transported for medical care.
- I.E.3. Cooperating agencies will be provided with the opportunity to become familiar with the Facility layout, properties of the waste handled at the Facility and associated hazards; emergency equipment and operation; and evacuation plans and routes. An annual tour of the Facility is offered to cooperating agencies, and they are invited to attend applicable training sessions conducted at the Facility to train personnel in techniques for handling hazardous materials, spill response, clean-up and safety procedures.

I.E.4. In the event of an emergency, the Facility will notify the appropriate cooperating agencies if their assistance is needed. These agencies will be briefed periodically to ensure a knowledgeable working relationship in the event of an emergency.

## II. IMPLEMENTING CONDITIONS

II.A. **Sudden events:** Applicable action(s) specified in this Contingency Plan will be implemented under the following circumstances:

### II.A.1. Fire

II.A.1.a. A fire which results in release of a reportable quantity 40 CFR, Parts 117, 302, and 355 of hazardous substances to the environment.

II.A.1.b. Fire threatening an explosion.

II.A.1.c. Fire that could spread beyond the Facility fence.

II.A.1.d. Fire in which the water and/or chemical suppressant or other fire fighting material used could result in contaminated runoff to surface waters or infiltration to groundwater.

II.A.2. Explosion. Any explosion involving hazardous material or waste.

### II.A.3. Spill or Release of Material or Waste

II.A.3.a. Any spill or release of a reportable quantity of hazardous material as defined in 40 CFR, Parts 117, 302, and 355.

II.A.3.b. A spill which could result in the release of flammable or ignitable liquids, fumes or vapors which have the potential of causing a fire or explosion.

II.A.3.c. A spill which has the potential of reaching uncontaminated runoff drainage ditches or groundwater.

II.A.3.d. Any spill or release of wastes or segregated stormwater runoff not contained within the boundary demarcated by the facility fence.

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- II.A.3.e. Any leak, seepage or release of runoff from the segregated stormwater drainage ditches, lift station or the pipeline from the lift station to the Segregated Stormwater Retention Basin.
- II.A.4. Floods or precipitation events. Any flood or precipitation event that results in wastes being exposed to precipitation at any location where runoff is not contained.
- II.A.5. Unknown or Uncontrolled Reactions. The Contingency Plan will be implemented whenever wastes are reacting violently and the reaction cannot be safely controlled or stopped.
- II.A.6. Loss of Electrical Power. The Contingency Plan will be implemented whenever a loss of electrical power could result in the accumulation or release of toxic vapors or fumes that threaten human health or the environment or could result in a fire or explosion.
- II.B. **Non-Sudden events:** Responses specified within Section V of this Contingency Plan will be implemented for the following non-sudden events:
- II.B.1. An exceedance in the Facility's groundwater inspection monitoring data as defined within the Groundwater Protection Program. This includes discovery of hazardous waste constituents or Secure Cell leachate constituents in a Secure Cell or Treatment Building Leak Detection Sump, and/or in a Permanent Sump.
- II.B.2. Discovery of contaminated groundwater within or outside the Facility compliance boundary.
- II.B.3. The Response Leakage Rate for Secure Cell 1 or the Action Leakage Rate (ALR) for Secure Cells 2 through 7 and Treatment Building for liquids removed from the leak detection systems are exceeded during the active life, closure or post closure periods. The rate of removal of water from the Leak Detection Systems will be determined in accordance with procedures in the Inspection Plan.

SECURE CELL	CELL AREA (acres)	ACTION LEAKAGE RATE		RESPONSE LEAKAGE RATE (GPW)
		Gallons Per Acre Per Day	Gallons Per Day	
1	N/A	N/A	N/A	600
2	5	480	2,400	N/A
3-7	10	240	2,400	N/A
Treatment Building	3.5	500	1,750	N/A

### III. SUDDEN EVENT RESPONSE ACTIVITIES

In event of an incident requiring implementation of the Contingency Plan as defined in Section II.A above, a specially trained Emergency Response Team will respond to the situation with the necessary equipment to control the incident as quickly as possible. The response procedures for various categories of events are described below:

A. **Fire/Explosion.** If a fire or explosion occurs at the facility in any area, the following will occur:

III.A.1. The person first noting the incident will immediately activate the alarm system.

III.A.2. The immediate area will be evacuated of all personnel not involved with emergency response procedures.

III.A.3. The Emergency Coordinator will be notified. The Emergency Coordinator shall be provided or shall identify the character, source, and volume of material involved and/or released in the incident.

III.A.4. The Emergency Coordinator will provide adequate protection of the emergency personnel based on the severity of the fire and the wastes involved.

III.A.5. The Emergency Coordinator will shutdown operations within the area, if necessary.

III.A.6. The response team will extinguish the fire.

III.A.7. After the fire is out, a damage report will be prepared and remedial work initiated, if required.

III.A.8. All fire fighting equipment used during the emergency will be cleaned and any used supplies will be replenished (e.g., fire extinguishers, kiln dust, fly ash, water).

III.A.9. The Emergency Coordinator will ensure water used to fight the fire is properly handled and disposed.

III.B. **Spills.** General spill response procedures include the following:

III.B.1. Isolate the spill area, evacuating all non-essential personnel from the immediate area of the release. Prevent surface waters from flowing from or into the area of the release.

III.B.2. Remove any injured personnel from the hazardous area.

III.B.3. The Emergency Coordinator will be notified. The Emergency Coordinator shall be provided or shall identify the character, source, and volume of material involved and/or released in the incident.

III.B.4. Prevent spilled liquids from spreading along roadways or draining into ditches or streams by means of temporary dams, trenches, booms or dikes.

III.B.5. Cover released powdered material to prevent wind dispersal.

III.B.6. Manage spilled liquids by absorbing, adsorbing or pumping into drums, the treatment mixing basins, or available tanks.

III.B.7. Place spilled solid materials into drums or other containers.

III.B.8. Clean the spill area by removing the clean-up agents, waste materials and any contaminated soils. Contaminated soils, clean-up agents and spilled materials will be managed in accordance with the Waste Analysis Plan.

III.B.9. If a spill involves surface water management systems, analyze the water prior to removing the contents.

III.B.10. Clean all equipment, tools, or re-useable clothing that came in contact with the released material to prepare them for use in other operations.

III.B.11. Restock any response equipment and supplies depleted during the response.

III.B.12. Complete an investigation of the incident that includes recommendations and process modifications that are to be implemented as necessary.

III.C. **Unknown or Uncontrolled Reactions.** If wastes are reacting violently, such as producing vapors, and the reaction cannot be immediately and safely stopped or controlled, the following procedures will be followed:

III.C.1. The first person noting the incident will immediately activate the alarm system.

III.C.2. The immediate area will be evacuated of all personnel not involved in the response procedures.

III.C.3. The Emergency Coordinator will be notified. The Emergency Coordinator shall be provided or shall identify the character, source, and volume of material involved and/or released in the incident

III.C.4. Operations within the area of the incident will cease while the Emergency Coordinator assesses the situation.

III.C.5. The Emergency Coordinator will establish actions to be taken to control the reaction.

III.C.6. If a reaction results in the release of uncontrolled air emissions, then to the extent possible, concentrations at the perimeter of the area will be monitored to assess any impact on human health.

III.C.7. When a reaction has been controlled, an investigation of the waste reaction will be conducted and documented in the operating record.

III.D. **Flood/Precipitation Events.** If waste is exposed to precipitation at locations where runoff is not contained, then appropriate procedures for responses to spills specified above shall be implemented.

III.E. **Loss of Electrical Power.** In the event of power outages or electrical failure, the mobile telephone system will be used. Waste receipts shall be routed to the staging area until power is restored. In the event of a power outage, receipts into the Treatment Building will be stopped until power is restored.

#### IV. **RESPONSIBILITIES OF THE EMERGENCY COORDINATOR**

At all times, there will be at least one employee either on the Facility premises or on call (i.e., available to be notified and respond to emergency by reaching the Facility within 0.5 hour) with the responsibility for coordinating all emergency response measures related to sudden event categories identified in Section III of this Contingency Plan. The emergency coordinator will be thoroughly familiar with all aspects of the Contingency Plan, all operations and activities at the Facility, the location and characteristics of waste handled, the locations of records at the Facility, and the Facility layout. The Emergency Coordinator will have the authority to commit the resources needed to carry out the elements of this Contingency Plan. A list of Facility Emergency Coordinators is in Appendix 4. The specific responsibilities of the Emergency Coordinator are discussed below:

##### IV.A. **Identify Character, Source and Amount of Released Material**

In the event of a release, fire or explosion, the Emergency Coordinator identifies the character, source, volume and extent of release of the discharged materials by observation or review of facility records and manifests. The Facility laboratory may be used to further identify the characteristics of the waste.

##### IV.B. **Assess Hazards to Human Health or the Environment**

The Emergency Coordinator assesses imminent hazards to human health or the environment that may result from a release, fire or explosion. This assessment will consider both direct and indirect effects of the release, fire or explosion. Examples of circumstances that may represent imminent hazards include:

- Unconfined fire and/or explosion;
- A fire that releases toxic vapors;
- A fire that spreads and could ignite materials at other locations on-site or could cause heat-induced explosions;
- A fire that could spread to off-site areas;
- There is imminent danger that an explosion could occur;

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- There is imminent danger that an explosion could ignite other hazardous waste at the Facility;
  - Unconfined spills or release of waste materials;
  - A spill that could result in a release of flammable liquids or vapors, thus causing a fire or gas explosion hazard; and
  - A spill that releases toxic liquid or vapors.
  - A release to surface waters

As part of the above assessment the Emergency Coordinator will determine if evacuation of the Facility is necessary. If evacuation is required the following procedures will be implemented.

#### **IV.B.1. Emergency signal codes.**

The emergency signal code for evacuation is 1 long continuous horn blast. The primary and secondary evacuation routes from the Facility are shown in Appendix 5. Alternate evacuation routes are included in the event the primary evacuation routes are not useable. It is the responsibility of the Emergency Coordinator to announce the evacuation route for personnel to use and when to begin evacuating.

#### **IV.B.2. Evacuation routes.**

Primary and secondary evacuation routes are provided in Appendix 5 for the following:

- Treatment Building/Container Management Building
- Off-Site Vehicle Truck Wash Facility
- Operations Building
- Maintenance Building
- Wastewater Treatment Plant

#### **IV.C. Sudden event notification/reporting requirements.**

If the Emergency Coordinator determines that a sudden event defined in Section II.A that could threaten human health or the environment outside the facility, the Emergency Coordinator will implement the following notification procedures:

- IV.C.1. Notify agencies identified in Appendix 3 for the indicated category of sudden events.

IV.C.2. At the time of initial notification of specific agencies, the following information will be provided:

- IV.C.2.a. Location and type of incident.
- IV.C.2.b. Amount and identification of material involved.
- IV.C.2.c. If any wastes or known potentially contaminated runoff reached surface water drainages outside the fenced facility boundary.
- IV.C.2.d. If evacuation of the Facility has taken place.
- IV.C.2.e. Extent of injuries and exposures to on-site personnel and an assessment of public exposure to released wastes and other materials.

IV.C.3. Will clearly specify to the agency being notified whether a response is requested. In addition, the Emergency Coordinator or his/her designee will inform the agency being contacted if specific arrangements need to be implemented.

IV.C.4. Advise the agency if the emergency at the Facility presents a potential threat to surrounding areas. The Emergency Coordinator will be prepared to assist authorities in making the final determination relative to evacuation of areas proximate to the site. This assessment will consider the effects of toxic, irritation or asphyxiating gases, hazardous surface run-off due to water or chemical agents used to control fire, etc. The final decision to evacuate the areas proximate to the site will be the responsibility of the local agencies. The evacuation routes for areas in proximity to the site are shown on Appendix 5.

## **V. NON-SUDDEN EVENTS RESPONSE ACTIVITIES**

This section outlines actions to be taken by facility personnel in the event of a non-sudden Contingency Plan event as defined in Section II.B. In the event of an incident requiring implementation of this section, the Facility management will ensure the applicable response procedures described below are implemented.

### **V.A. Exceedances in Groundwater Inspection Monitoring Data**

When a confirmed exceedance (as determined by the procedures within the Groundwater Monitoring Plan and Part VII of this Permit) occurs in a groundwater inspection monitoring well, the following procedures will be implemented:

- V.A.1. When the well or sump has recovered sufficiently to produce a complete set of aliquots, the Permittee shall immediately resample the affected monitoring wells or sumps and as follows:
- V.A.1.a. Re-sample inspection monitoring wells that are located adjacent to a Secure Disposal Cell(s) and within 100 ft from any interior well that has experienced any concentration increase. Analyze these samples for the background parameters listed in the Groundwater Monitoring Program, Table VII-2, and for any known Secure Cell leachate constituents that are not on that list.
  - V.A.1.b. Re-sample inspection monitoring wells outside the Compliance Boundary that have previously experienced any concentration increase over background and also those wells closest to the wells that show any increase, whether interior or Compliance Boundary wells. Analyze these samples from those wells for the parameters found in the Groundwater Monitoring Program, Table VII-2 and other known Secure Disposal Cell leachate constituents.
- V.A.2. As soon as possible within receipt of the analyses required by (1.a.) above, the Permittee shall provide written data to the Department with a preliminary interpretation of the data and all available information regarding possible sources of the groundwater contaminants. The results shall in no case be submitted more than 45 days after collection.
- V.A.3. Submit within 60 days after receipt of the analyses required by (1.a.) above, an interpretive report to the Department that describes the most recent groundwater sample analyses in the context of all known hydro-geologic information concerning the site, including comparison with all previous surface and groundwater analyses, Secure Cell leachate, and Leak Detection Systems sample analyses.
- V.A.4. Submit the interpretive report even if the most recent analyses do not confirm the initial indication that hazardous waste constituents may have been released into groundwater. In this case, the report must focus on explaining the initial false positive indication of groundwater contamination, including complete review of sampling, shipping, and analytical methods used for all of the Permittee's sampling campaigns.

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- V.A.5. If the analyses required above confirm that a release has occurred, submit a proposal to the Department outlining how the facility will investigate the source and extent of the release. The report will be submitted at the same time that the interpretive report is submitted. This investigation proposal must address the suitability and accuracy of the following strategies to determine the source and extent of the apparent release:
- V.A.5.a. Installation of additional monitoring well(s) and groundwater sampling, including new wells installed in accordance with procedures within the Groundwater Monitoring Plan;
  - V.A.5.b. Soil vapor collection and analysis, both at ground surface and in boreholes;
  - V.A.5.c. Soil moisture content determination by sampling from boreholes in the vicinity of a potential contaminant plume;
  - V.A.5.d. Unsaturated soil/core sampling and analysis for the parameters required for groundwater;
  - V.A.5.e. Angle boring under edges of a Secure Cell or impoundment to provide water, vapor or soil samples from locations below the outside edge of the floor of the cell or impoundment adjacent to any well which contains contaminated groundwater.
  - V.A.5.f. The proposal must choose one or more of these methods or other more suitable methods and include a time schedule for all activities to be implemented upon receipt of written authorization from the Department to proceed.
- V.A.6. Upon completion of the investigation, the following shall be documented: a) the actual activities of the investigation, b) analytical results, c) new well or borehole completion details, d) the location of any contaminant source(s) found, and e) the vertical and horizontal extent of migration of contaminants from that source.

The conclusion of the investigation report must contain a summary statement identifying any source or plume areas that have not yet been fully defined and make recommendations concerning remedial containment, repair, and cleanup required to prevent release of hazardous wastes or hazardous waste constituents from the Facility.

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Alternatives considered in the summary must include partial excavation and remediation of hazardous wastes or hazardous waste constituents.

- V.A.7. If an active Secure Cell is determined to be the most likely source of released wastes, either before or after review of the report of investigation, disposal of waste in that cell will stop. Disposal operations may not resume in that cell until all necessary repairs are completed and approved by the Department.
- V.A.8. If it is determined that partial or complete excavation of a cell is necessary to permanently stop releases of wastes or constituents, the Facility shall notify the Department of activities that may include such excavation, repair or removal, and any resulting changes in or additions to the Facility treatment, storage or disposal units or their operation, or the Closure Plan. Activities shall be incorporated into this Permit through a Modification Request.
- V.B. **Exceedance of Response Leakage Rate (RLR) for Secure Cell 1 or Action Leakage Rate (ALR) for Secure Cells 2 through 7.** If the Response Leakage Rate for Secure Cell 1 or the ALR is exceeded for any of the Secure Cells 2 through 7, The Permittee will:
- V.B.1. Notify the Department in writing within seven days of the determination that the ALR or RLR has been exceeded;
- V.B.2. Submit a preliminary written assessment to the Department within 14 days of determination, that the ALR or RLR was exceeded. The report will include the amounts of liquids; likely sources of liquids; possible location, size, and cause of any leaks; and short-term actions that were taken; and any planned actions.
- V.B.3. Determine, to the extent practicable, the location, size, and cause of any leak;
- V.B.4. Determine whether waste receipts should cease or be curtailed; whether any waste should be removed from the unit for inspection, repairs, or controls; and whether or not the unit should be closed;
- V.B.5. Determine short-term and long-term actions to be taken to mitigate or stop any leaks;
- V.B.6. Submit the results of the determinations described above, the results of the actions taken and a description of the actions planned to the Department within 30 days after the notification that the action leakage rate has been exceeded.

- V.B.7. Submit monthly, as long as the action leakage rate continues to be exceeded, a report to the Department summarizing the results of any remedial actions taken and planned; and
- V.B.8. In making the determinations described in this plan either conduct the following investigations or document why such an investigation is not needed:
- V.B.8.a. Assess the source and amount of liquid from each source collected in the system,
  - V.B.8.b. Conduct a hazardous constituent analysis of the liquid collected in the sump and use the results to help identify the source(s) of the liquid and possible location of any leaks as well as the potential hazard associated with the liquid and its mobility.
  - V.B.8.c. Assess the seriousness of any leaks in terms of potential for escaping into the environment.

**CONTINGENCY PLAN**

**APPENDIX 1**

**Emergency Response Equipment and Personnel  
Specifications**

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CONTINGENCY PLAN  
EMERGENCY RESPONSE EQUIPMENT AND PERSONNEL SPECIFICATIONS  
APPENDIX 1

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**I. EMERGENCY EQUIPMENT LIST**

The Facility is equipped with the emergency equipment listed in Table A1.1 that may be utilized for implementation of response actions required by the Contingency Plan. Table A1.1 also presents the location of the equipment, the equipment applicability and areas of intended use.

In addition to the equipment listed in Table A1.1, the Facility has on-site heavy equipment that may be utilized for responses. The equipment is listed in Table A1.2.

A brief discussion of the major elements of the compliment of emergency response and communication equipment is presented below.

**A. Signs**

Signs will be placed where needed at the site to specify safety requirements, mark restricted areas and exit routes, describe areas containing first aid equipment, and identify locations for emergency and safety equipment.

**B. Emergency Communication Equipment**

The Facility maintains an emergency communication network consisting of an intercom/public address system, alarm system, telephones, and 2-way radios. These devices are described below.

**1. Intercom/Public Address System**

At a minimum, all of the following buildings will be equipped with an intercom/public address system:

- Containment Building/Container Management Building
- Operations Building
- Maintenance Building
- Guardhouse

## 2. Horns

An electrically activated system and/or sound alarms will be audible throughout the following areas:

- Operations Building
- Treatment Building/Container Management Building
- Sampling Station
- Active Secure Cell Area
- Off-Site Vehicle Truck Wash Area
- Contaminated Water Storage Tank Area
- Guardhouse

## 3. Two-Way Radios

The Facility will maintain a 2-way radio base station will be located in the Guardhouse. This station will be manned by a trained individual who has immediate access to the base station during operating hours. When any employee is located in a remote area of the facility away from visual or voice contact with other employees, the employee will have immediate access to a device, such as a telephone or hand-held two-way radio capable of summoning emergency assistance.

## 4. Telephone

The Facility has a telephone system to contact off-site emergency response authorities and uses cellular telephones as a back-up.

## C. **On-Site Emergency Response Vehicle**

The Emergency Response Vehicle is a 4-wheel drive vehicle capable of towing a utility trailer. The utility trailer is equipped with the following emergency equipment: positive pressure self-contained breathing apparatus, fire fighters' turnout clothing, fully encapsulated and flash protection suits, chemical resistant gloves, boots and face shields, 30 gallons of aqueous film forming foam concentrate, foam educators and 300 ft of industrial grade 1-1/2 inch fire hose with appropriate foam eductor and nozzles. This unit is equipped with spill control and absorbent materials and other clean up tools.

**D. Fire Extinguishers**

The following 2 types of fire extinguishers are used at the Facility:

- multiple purpose dry-chemical type, Portable ABC; and
- aqueous film forming foam extinguishers (AFFF).

The aqueous film forming foam extinguishers shall be placed in all areas classified as High Hazard. Portable type ABC extinguishers will be placed in all other buildings and areas, such as on the heavy equipment used in the Treatment Building and active Secure Cell and site vehicles.

Areas of access to fire extinguishers and hydrants will be identified and kept unobstructed. All extinguishers shall be inspected and maintained in accordance with NFPA #10 standards. All site personnel will be familiar with the location of extinguishers and trained in the proper operation of fire extinguishers.

**E. Fire Fighting Water System**

A water pressure system was designed and constructed for fighting fires. The system consists of the following:

- One 48,000 gallon underground fiberglass water storage tank;
- Yard water distribution system with 2-1/2 inch hydrants connected to fire hose cabinet stations designed to meet NFPA Standard #24. Each hydrant cabinet will be equipped with the capability to induct AFFF directly into the fire hose streams;
- Two fire pumps each capable of providing a flow value of 500 gpm for the first hydrant and 250 gpm for all subsequent hydrants at 65 psi. Total flow rate will be 1,500 gpm at 65 psi residual pressure;
- An automatic fire alarm and detection system that has remote heat sensing thermostats positioned at strategic locations in the buildings;
- The primary pump is electrically driven. The second pump will be diesel operated and turned on automatically at the time of loss of power from the utility company, and;

- The contents of the 1 million gallon construction water storage tank will be piped to the 48,000 gallon fiberglass tank. The combined volume of water for fire fighting available from the fiberglass tank and the construction water tank shall be a minimum of 228,000 gallons.

A static pressure of 90 psi is maintained in the system by a jockey pump. When the water nozzle is turned on in the hose cabinet and the system pressure drops, a pressure sensor turns on 1 of the water pumps that maintains a 65 psi residual pressure at 1,500 gpm flow rate. If the pressure drops below 65 psi, the second pump will be turned on automatically. When the water flow is turned off and the pressure returns to 90 psi, the pump(s) shut off automatically.

The location of the water storage tanks is illustrated in Appendix 5. This diagram also depicts the location of the hydrants equipped with hose valves for fire fighting purposes, as well as their ranges. The Permittee shall maintain 48,000 gallons of water in the fire tank and shall maintain an additional 180,000 gallons of water in the construction water tanks for fire fighting.

#### F. **Fire Detection and Alarm Systems**

The Facility is equipped with fire detection, alarm systems and closures. Both systems are activated by heat and are installed in accordance with NFPA 72a and 72e.

#### G. **Spill Control Equipment**

Equipment is maintained for on/off-site containment, decontamination and clean-up of hazardous materials in the event of a release. This equipment consists of vacuum equipment, adsorbents, backhoes, dump trucks and loaders. Additional support equipment is listed below:

- Portable Pumps
- Suction Hose
- Discharge Hose
- 55 gallon open-head drums with gaskets and covers
- Recovery Drums
- Shovels
- Rakes
- Air Packs
- Solidification Reagent
- Heavy Duty Sorbent Boom

**H. Emergency Electrical Generator**

The Facility shall either maintain an emergency electrical generator capable of supplying electricity sufficient to maintain ventilation in the treatment building or shall stop receipts to the treatment building until such time electrical power is restored.

**I. Aisle Space**

Adequate aisle space will be maintained at The Facility to provide unobstructed access to and movement of stationary communication systems, fire response equipment, spill response equipment, safety equipment and first aid supplies. In addition, the following specific aisle spaces must be maintained for emergency personnel and fire protection equipment.

1. A minimum 4 ft aisle space will be maintained to provide complete access to all fire hydrant systems. The location of these units is described in Appendix 5.
2. A 15 ft fire lane will be maintained to provide access to the following locations:
  - Sampling Station
  - Contaminated Water Storage Tank Area
  - Off-Site Vehicle Truck Wash Facility
  - Maintenance Building
  - Operations Building
  - Active Secure Disposal Cell

The fire lanes will be immediately accessible to emergency vehicles and equipment and will be clearly labeled or posted as fire lanes. Unattended or parked vehicles are not allowed in any area designated as a fire lane.

**II. EMERGENCY RESPONSE PERSONNEL****A. General**

In the event of a fire, explosion or release of hazardous material or waste, a specially trained Emergency Response Team will respond to the incident. The Emergency Response Team includes the Emergency Coordinator or an Alternate Emergency Coordinator and two other team members will be present on the facility during operating

hours. After operating hours, a response team will be available to respond to emergency situations.

**B. Emergency Response Team Responsibilities**

The Emergency Response Team has the responsibility for ensuring that all necessary equipment and supplies are transported to the scene of a fire, explosion or spill, as well as respond to the incident using training and experience gained through team membership.

**C. Emergency Response Team Staffing**

The Emergency Response Team shall be staffed from a volunteer crew of facility personnel, including the Emergency Coordinator or the Alternate Emergency Coordinator. Each team is under the supervision of the Emergency Coordinator or the Alternate Emergency Coordinator. The minimum number of team members is three.

Team members will consist of multiple skilled Facility personnel. If required to respond to an emergency, the Emergency Response Team will have individuals capable of operating heavy equipment, an individual capable of operating the Vacuum Truck, and individuals capable of providing general labor.

**D. Training**

All members of the Emergency Response Team will be trained in accordance with the personnel training plan.

CONTINGENCY PLAN  
TABLE A1.1  
EMERGENCY EQUIPMENT

ITEM	QUANTITY	APPLICABILITY	LOCATION	COVERAGE AREA
1. Fire Extinguishers	Approximately 130	Extinguish small to medium fires	All buildings, Tank Farms, Fuel Island, Secure Cell, Heavy Equipment, On-site Emergency Response Vehicle	Through-out the site
2. Fire Hydrants (Standpipes)	7	Water supply	See Map	See Map
3. On-site Emergency Response Vehicle	1	Assist in emergency response	Varies	Entire site
4. Off-site Emergency Response Vehicle	1	Carries emergency response equipment	In the operational area	Entire site and off-site
5. Adsorbents and Booms	varies	On-site emergency response vehicle and the 22 orange drums	Throughout the site	Throughout the site
6. Two-way Radios	Sufficient to equip all site personnel and visitors	Personnel communications	Available to all site personnel. Base radios in Operations Building	Throughout the site
7. First Aid Kits/Equipment	Distributed throughout the facility	Accidents and emergency response	On-site Emergency Response Vehicle, All Main Buildings, Secure Cell, Most Vehicles	Through-out the site

<b>ITEM</b>	<b>QUANTITY</b>	<b>APPLICABILITY</b>	<b>LOCATION</b>	<b>COVERAGE AREA</b>
8. Spare AFFF Supplies	50 gallons minimum	Maintenance and replacement of AFFF extinguisher foam	On-site Emergency Response Vehicle, storage	Throughout the site
9. SCBAs and Spare Bottles	12 units, 24 one-hour bottles	Provide supplied air for hazardous area entry	On-site Emergency	Throughout the site
10. Mobile Foam Units Wheeled AFFF fire extinguishers	8	Extinguish fires	Container Management Area, Maintenance, Containment Building (2), Sampling Station, Fuel Island, Guard House, Pump House	Throughout the site
11. Eye Washes Stationary and Portable	Approx. 20	Accident and emergency response	In main buildings, Secure Cell, available for on-site Emergency Response Vehicle	Throughout the site IAW 29 CFR 1910.151
12. Safety Showers	Approx. 10	Accident and emergency response	All main buildings	Throughout the site IAW 29 CFR 1910.151
13. Monitoring Equipment	More than 10 of various types	Hazardous or potentially hazardous area monitoring	Operations Building (battery operated equipment)	Throughout the site

TABLE A1.2  
LIST OF HEAVY EQUIPMENT

<b>No.</b>	<b>Type</b>
1	Dump Trucks
1	Loader
1	Motor Grader
1	Vacuum Truck
1	Water Truck
1	Fork Lift
1	Fuel Truck
1	Dozer
1	D8N Dozer
1	Compactor
1	Excavator
1	Sweepster

**CONTINGENCY PLAN**

**APPENDIX 2**

**Emergency Response Agencies**

CONTINGENCY PLAN  
EMERGENCY RESPONSE AGENCIES  
APPENDIX 2

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Adams County Mutual Aid Trust ADCOM (24-hour number) .....	(303) 288-1535
AMI Presbyterian Hospital (Aurora) Emergency Room.....	(303) 360-3133
General.....	(303) 363-7200
Air Life.....	(303) 360-3400
Ambulance Service Deer Trail Rescue Squad .....	(303) 769-4545
Byers Rescue Squad.....	(303) 822-5353
Fort Morgan Medical Center Emergency and General Number.....	(970) 867-3391
Southwest Washington County Fire Department .....	(970) 386-2235

**CONTINGENCY PLAN**

**APPENDIX 3**

**List of Emergency Contacts and Notification Authorities**

LIST OF EMERGENCY CONTACTS AND NOTIFICATION AUTHORITIES  
APPENDIX 3

When notification of outside agencies is required in accordance with Section IV.C of the Contingency Plan, the Emergency Coordinator or his designee will notify the Federal, State and local agencies and authorities identified for the categories of events listed below:

**1. Contained Spills and/or Fires On-Site**

Colorado Department of Public Health and the Environment  
Hazardous Materials and Waste Management Division  
24 Hour Emergency Number: 1 877-518-5608

NOTE: The CDPHE may require additional notifications based on the magnitude of the problem.

**2. Uncontained Spills or Fires and/or Uncontrolled Releases Events**

- a. Adams County Mutual Aid Trust  
ADCOM - 24-hour number: (303) 288-1535
  
- b. Tri-County Health Department  
  
M-F, 8:30 to 5:00, (303) 288-6816  
Non-operating hours call: (303) 230-7993 or (303) 230-9987
  
- c. Arapahoe County Sheriff's Department  
Sheriff - 24 hour number: (303) 795-4711
  
- d. Washington County Sheriff's Department  
24 hour Emergency Number: (970) 345-2244
  
- e. Colorado Department of Public Health and Environment  
Hazardous Materials Waste Management Division  
24 Hour Emergency Number: 1 877 518-5608
  
- f. Northeast Colorado Health Department  
Emergency Number: (970) 522-3741
  
- g. U.S. Environmental Protection Agency

Emergency Response Branch - Region VIII  
Emergency Response Number 24 Hours: (303) 293-1788

- h. RCRA National Response Center (only for reportable quantities)  
Number: (800) 424-8802
  
  - i. Emergency Medical Air Service  
AMI Presbyterian Hospital, 700 Potomac, Aurora, CO  
Emergency Number: (303) 360-3133 or  
General: (303) 363-7200  
Air Life: (303) 360-3400
  
  - j. Ambulance Service  
Deer Trail Rescue Squad: (303) 769-4545  
Byers Rescue Squad: (303) 822-5353
  
  - k. Community Hospital  
Fort Morgan Medical Center, 1000 Lincoln, Fort Morgan  
Emergency/General: (970) 867-3391
  
  - l. Concerned Citizens of Eastern Colorado  
Chairperson - Pam Wheldon  
(970) 386-2278
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**CONTINGENCY PLAN**

**APPENDIX 4**

**List of Emergency Coordinators**

LIST OF EMERGENCY COORDINATORS  
APPENDIX 4

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- Primary:** Tarry Cluff  
Home Address: 407 Custer Street  
Brush, CO 80723  
Home Phone: (970) 842-5427  
Cell Phone: (617) 823-9397
- Alternate:** Ismeal Hernandez  
Home Address: 604 Carson Street  
Brush, CO 80723  
Home Phone: (970) 842-9736  
Cell Phone: (617) 823-9427
- Alternate:** Randy Musgrave  
Home Address: 620 S. Sherman  
Strasburg, CO 80136  
Home Phone: (303) 622-4438
- Alternate:** Dan O'Brien  
Home Address: 901 Edison  
Brush, CO 80723  
Home Phone: (303) 842 0962
- Alternate:** Dennis Stahn  
Home Address: 16055 Highway 36 Box 27  
Lindon, CO 80740  
Home Phone: (970) 383-2234

**CONTINGENCY PLAN**

**APPENDIX 5**

**Site Evacuation and Fire Suppression System Maps**