

# **Attachment 5**

**RCRA Part B Permit Application**

## **Contingency Plan**

**US Ecology Tulsa, Inc.**

**EPA ID: OKD000402396**



**Tulsa, Oklahoma**

**Permit Application**

**July 11, 2022**

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## **CONTINGENCY PLAN**

This section provides a general description of the US Ecology Tulsa, Inc. (USE Tulsa) hazardous waste management facility as well as procedures to follow in the event of an emergency. US Ecology Tulsa, Inc. has developed this Contingency Plan in accordance with the requirements of 40 CFR Part 264 Subpart D and applicable rules and regulations under the Oklahoma Hazardous Waste Disposal Act (OHWDA) administered by the Oklahoma Department of Environmental Quality (ODEQ).

This Contingency Plan is designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

### **1. GENERAL FACILITY INFORMATION**

US Ecology Tulsa, Inc. operates a hazardous waste treatment and storage facility. Currently, hazardous waste management on-site includes storage and treatment of a wide variety of industrial wastes. Waste management on-site may include transfer facility activities such as storage prior to shipment off-site as well as transfer station activities such as bulking, decanting, etc. (as defined under OAC 252:205-8-1). In addition, US Ecology Tulsa, Inc. conducts solid waste management activities in accordance with the requirements of OAC 252:515-3-1(a)(2)(A), (a)(2)(G), and (a)(3).

US Ecology Tulsa, Inc. is in an industrial area west of Tulsa, Oklahoma. The facility is in Tulsa County outside the Tulsa city limits.

The US Ecology Tulsa, Inc. waste management facility consists of waste treatment areas, storage building/areas, laboratory facilities, tank storage/treatment areas, container storage/treatment areas, truck unloading areas, staging tanks, pump(s), surface piping, and ancillary equipment as well as administrative offices, truck parking, and employee/visitor parking.

The majority of wastes managed at USE Tulsa originate off-site as a result of industrial processes, remediation activities, or other activities. USE Tulsa customers (i.e., "generators") contract with USE Tulsa for waste management. Specific hazardous wastes managed on-site are identified in the facility Part A Permit Application which is Section A of this application. In addition, solid wastes as defined by 40 CFR 261.2 are managed on-site. Hazardous or solid wastes accepted for management may originate from industrial generators, other hazardous waste Treatment, Storage, and Disposal Facilities (TSDFs), or from activities regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

**2. EMERGENCY COORDINATORS: 40 CFR 264.52(d); 40 CFR 264.55**

Primary and Alternate Emergency Coordinators have been designated for the USE Tulsa facility. The Emergency Coordinator (EC), or designee, will be responsible for implementing the Contingency Plan as necessary in the event of an on-site incident. Each of the personnel listed in Appendix 2- Emergency Coordinators are qualified to assume the responsibilities of the EC (Appendix 2 identifies one primary EC and alternate ECs). The Primary and Alternate ECs will be thoroughly familiar with all aspects of the facility's Contingency Plan, operations, and activities at the facility, the location and nature of wastes handled, the location of records within the facility, and the facility layout.

In the event of an emergency on-site, the Primary EC should be contacted; if the Primary EC is not available, the Alternate ECs should be contacted (in the order listed). The primary EC and alternates have complete authority to commit all resources of the company in the event of an emergency. Appendix 5-Authorization for Implementation of Contingency Plan, documents this authority. Appendix 3-List of Coordinating Agencies, identifies organizations that will be contacted by the EC, as deemed necessary, in the event of an emergency.

### **3. IMPLEMENTATION: 40 CFR 264.52(a); 40 CFR 264.56(d)**

The provisions of this plan will be implemented immediately whenever there is an on-site fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment. The facility EC, or his designee, will implement this plan in the event of an on-site incident (e.g., fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility which, in his/her opinion, threatens human health or the environment).

This plan is intended to be a guide for use in the event of an incident on-site; the EC will consider safety of personnel the top priority when implementing this Contingency Plan. In the event that the EC determines that the facility has had a release, fire, or explosion that could threaten human health or the environment outside the facility, the EC will report their findings as outlined in Section 4.

### **4. EMERGENCY RESPONSE PROCEDURES**

The following sections outline the procedures to follow in the event of an on-site emergency.

#### **a. NOTIFICATION: 40 CFR 264.56(a)**

Whenever there is an imminent or actual emergency, the emergency coordinator (or designee) will immediately:

- Activate internal facility communication system to notify all personnel
- Notify appropriate state or local agencies with designated response roles (if deemed necessary)

**b. IDENTIFICATION OF HAZARDOUS MATERIALS: 40 CFR 264.56(b)**

Whenever there is a release, fire, or explosion, the EC will (to the extent possible) immediately identify the character, source, amount, and areal extent of any released materials. This can be performed by visual observation, review of facility records, and (if necessary) by chemical analysis. Facility records available for review include waste profiles, manifests, operator records, truck placards, container labels, and waste analysis data on-site. The EC may consider incident character (i.e., size of spill or type of incident) as well as weather conditions when coordinating response actions.

**c. HAZARD ASSESSMENT: 40 CFR 264.56(c); 40 CFR 264.56(d)**

Concurrently with implementation of the Contingency Plan, the EC will assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the incident (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions).

If the EC determines that the facility has had a release, fire, or explosion that could threaten human health or the environment outside the facility, he will follow the procedures outlined below:

- If the assessment indicates that evacuation of local areas may be advisable, the appropriate local authorities must be notified. The EC must be available to help appropriate officials decide whether local areas should be evacuated
- The EC (or designee) will immediately notify (by telephone) the National Response Center (NRC) (24-hour toll free number: 800-424-8802) and provide the following information:
  - Name and telephone number of reporter

- Name and address of facility
- Time and type of incident (e.g., release, fire)
- Name and quantity of material(s) involved, to the extent known
- The extent of injuries if any
- The possible off-site hazards to human health or the environment

**d. RESPONSE AND CONTROL PROCEDURES: 40 CFR 264.52(a)**

This Contingency Plan outlines the actions facility personnel will take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. Potential incidents on-site may include one or more of the following classifications:

- Fire and/or explosions
- Spills or material releases
- Injuries of personnel
- Flood or other natural disasters

The EC will base any decisions regarding appropriate response actions on the assessment of the incident as outlined in Section 4c. In addition to the actions outlined in Section 4a (i.e., activation of facility communication system and notification of local response agencies), the procedures listed below should be implemented as deemed necessary:

- Remove all personnel, with exception of response personnel, from the immediate vicinity of the incident.
- If necessary, initiate the facility Evacuation Plan (see Section 7).
- Coordinate transportation to medical facilities or “first aid” for injured personnel, as appropriate.



- Implement procedures to reduce the impact of the incident on human health or the environment (i.e., installation of temporary containment for released liquid waste, shutdown of processes, etc., as outlined in section 4e)

**e. PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, RELEASES: 40 CFR 264.56(e)**

During an emergency, the EC will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. The measures will include, where applicable:

- Shutdown of processes and operations
- Collecting and containing released waste
- Removing or isolating containers
- Use, as necessary, of fire control structures, systems, and equipment

**f. STORAGE AND TREATMENT OF RELEASED MATERIAL AND SOIL: 40 CFR 264.56(g)**

Immediately after an incident, the EC (or designee) will arrange for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. Waste generated by incident response activities will be managed in accordance with state and federal regulations.

If the facility stops operations in response to a fire, explosion, or release, the EC (or designee) will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment wherever this is appropriate.

**g. INCOMPATIBLE WASTES: 40 CFR 264.56(h)(1)**

The EC (or designee) will ensure that (in the affected areas of the facility) wastes which are potentially incompatible with the released material will not be treated,

stored, or disposed of until cleanup procedures are completed. To manage incompatible wastes, the EC may utilize information available in facility records, or testing in accordance with the facility waste analysis plan (if required). Portable containment systems may be used to segregate incompatible waste.

**h. POST-EMERGENCY EQUIPMENT MAINTENANCE: 40 CFR 264.56(h)(2); 40 CFR 264.56(i)**

After an incident, all emergency equipment listed in this Contingency Plan will be cleaned/replaced to ensure that it is fit for its intended use before operations are resumed (i.e., equipment used for emergency response will be decontaminated by steam cleaning, water washing, or other appropriate method, used fire extinguishers re-charged, depleted supplies restocked, etc.). The EC (or designee) will notify the ODEQ and the Tulsa Area Local Emergency Management Agency that the facility is in compliance with the following requirements prior to resuming operations in the affected area(s) of the facility:

- No waste that may be incompatible with the released material is managed until cleanup procedures are completed
- All emergency equipment listed in this Contingency Plan will be cleaned and fit for its intended use
- A written report on the incident is submitted to the ODEQ within 15 days after the incident

**i. CONTAINER SPILLS AND LEAKAGE: 40 CFR 264.171**

In the event that liquids accumulate in container storage areas, accumulated liquids will be contained, collected, and managed in accordance with state and federal regulations. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the EC (or designee) will transfer the hazardous waste from this container to a container that is in good condition, over-pack the container, or manage the waste in on-site process.

**j. TANK SPILLS AND LEAKAGE: 40 CFR 264.1941(c); 40 CFR 264.196**

In the event of an incident resulting in spills or leakage from tank systems, the EC (or designee) will follow the procedures specified in sections 4j(i) to 4j(vi).

**i. CESSATION OF USE; PREVENTION OF FLOW OR ADDITION OF WASTES: 40 CFR 264.196(a)**

The flow of hazardous waste into a tank will be stopped immediately after identification of a spill or leak in the affected tank. A visual inspection of the tank and ancillary equipment will be conducted to identify the cause of the release.

**ii. REMOVAL OF WASTE FROM TANK SYSTEM OR SECONDARY CONTAINMENT: 40 CFR 264.196(b)**

Within 24 hours of detection of a leak or release from a tank system, waste will be removed (as necessary) to prevent further release of hazardous waste from the tank system. The tank system will be visually inspected and the required repairs performed. If hazardous waste is released to a secondary containment system, all released materials will be removed within 24 hours (or in as timely a manner as possible) to minimize potential harm to human health and the environment.

**iii. CONTAINMENT OF VISIBLE RELEASES TO THE ENVIRONMENT: 40 CFR 264.196 (c)**

In the event of a release of a hazardous waste from a tank system to the environment, US Ecology Tulsa, Inc. will immediately conduct a visual inspection of the release and (based upon that inspection) conduct actions to:

- Prevent further migration of the leak or spill to soils or surface water
- Remove and properly dispose of (or otherwise manage) any visible contamination of the soil or surface water.

#### **iv. NOTIFICATION AND REPORTS**

Any release of hazardous waste to the environment of an amount greater than one pound will be reported to the ODEQ within 24 hours of its detection (a report pursuant to 40 CFR 302 will satisfy this requirement). Within 30 days of detection of such a release to the environment, a report containing the following information will be submitted to the ODEQ:

- Likely route of migration of the release
- Characteristics of the surrounding soil (soil composition, geology, hydrogeology, climate)
- Results of any monitoring or sampling conducted in connection with the release (if available). If sampling or monitoring data relating to the release are not available within 30 days, these data will be submitted to the ODEQ as soon as they become available but not to exceed 60 days.
- Proximity to downgradient drinking water, surface water, and populated areas
- Description of response actions taken or planned

Releases of less than or equal to a quantity of one pound, which are immediately contained and cleaned up, will not be reported.

#### **v. PROVISIONS OF SECONDARY CONTAINMENT, REPAIR, OR CLOSURE: 40 CFR 264.196(e)**

As outlined below, damaged tank systems and associated containment systems will be repaired prior to returning these systems to hazardous waste service.

- If the cause of the release was a spill that has not damaged the integrity of the system, the tank system may be

returned to service as soon as the released waste is removed and repairs (if necessary) are made.

- If the cause of the release was a leak from the primary tank system into the secondary containment system, the system will be prepared prior to returning the tank system to service.
- If the source of the release was a leak to the environment from a component of a tank system without secondary containment, the component of the system from which the leak occurred will be equipped with secondary containment that satisfies the requirements of 40 CFR 264.193 before returning the unit to service (unless the source of the leak is an above ground portion of a tank system that can be inspected visually). If the source is an above ground component that can be inspected visually, the component will be repaired and may be returned to service without secondary containment after certification as outlined in section 4j(iv). Replacement tank systems will be certified in accordance with the requirements for new tank systems (40 CFR 264.192 and 40 CFR 264.193, as applicable). Additionally, if a leak has occurred in any portion of a tank system component that is not readily accessible for visual inspection (ex: the bottom of an in ground or on ground tank), the entire component will be provided with secondary containment in accordance with 40 CFR 264.193 prior to being returned to service.

Unless the procedures outlined above are completed, the affected tank system will be closed in accordance with the requirements of 40 CFR 264.197.

**vi. CERTIFICATION OF MAJOR REPAIRS: 40 CFR 264.196(F)**

When a tank system has been repaired as outlined in section 4j(v) and the repair has been extensive (ex: installation of an internal liner, repair of a ruptured primary containment or secondary containment vessel), the tank system will not be returned to service until the tank has been certified by an independent, qualified, registered professional engineer (in accordance with 40 CFR 270.11(d)) that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. This certification will be submitted to the ODEQ within 7 days after returning the tank system to use.

**k. SURFACE IMPOUNDMENT SPILLS, LEAKAGE, AND SUDDEN DROPS**

US Ecology Tulsa, Inc. does not have existing surface impoundments on-site, therefore, the facility is not subject to these requirements.

**5. EMERGENCY EQUIPMENT: 40 CFR 264.52(e)**

A list of emergency equipment at the facility (including description and brief outline of capabilities) is presented in Appendix 4- List of Emergency Equipment. Emergency equipment available includes items such as fire extinguishers, spill control equipment, communication systems (internal and external) and decontamination equipment. The equipment list will be updated as necessary. Location of emergency equipment on-site is shown in Appendix 1-Location of Emergency Equipment and Evacuation Routes.

**6. COORDINATION AGREEMENTS: 40 CFR 264.52(c); 40 CFR 264.37**

US Ecology Tulsa, Inc. has forwarded copies of this contingency plan to local response agencies, hospitals, and response contractors to familiarize these entities with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes. Copies of letters to the entities identified in Appendix 3- List of Coordinating Agencies requesting services (when required) are

maintained in the operating record. These entities will be provided with updates to the Contingency Plan. These entities will be provided with updates to the Contingency Plan. At agency request, the facility will provide those agencies (which have coordination agreements with the facility) the opportunity to tour the facility.

#### **7. EVACUATION PLAN: 40 CFR 264.52(f)**

The EC will evaluate any emergency and determine whether a facility evacuation will be necessary to protect the health and safety of personnel on-site. Evacuation routes and assembly points are shown on Appendix 1-Location of Emergency Equipment and Evacuation Routes. The following evacuation procedures are provided as a guide; specifics may be modified as required by the EC

- The EC (or designee) will initiate the evacuation plan by announcing the need to evacuate over the facility public address system. The verbal announcement will advise personnel of the need to evacuate. Additional information (ex: location/nature of incident, special requirements, or other instructions) regarding the incident may be provided via the public address system.
- All personnel, visitors, and contractors will immediately leave the facility and congregate at the designated rally point as instructed by the EC.
- A “head count” will be conducted by the EC (or designee) at the assembly point to identify missing personnel/visitors. The EC will use the public address system (if possible) to address to establish contact with any missing persons. The EC will be responsible for location of missing personnel; however, re-entry of the facility will be performed only if it is safe to do so. Site personnel will be accounted for by their immediate supervisors.
- Personnel shall not re-enter the facility unless specifically authorized by the EC.
- Additional procedures may be developed (as required) by the EC (ex: alternate evacuation route(s) and assembly point(s) may be selected if designated routes and assembly points are not accessible.

**8. REQUIRED REPORTS: 40 CFR 264.56(j)**

An emergency event (fire, explosion, spill, etc.) that requires implementation of this contingency plan will be reported in writing to the ODEQ within 15 days.

**9. AMENDMENTS TO THE CONTINGENCY PLAN: 40 CFR 264.54**

The Contingency Plan will be reviewed and immediately amended, if necessary, whenever:

- The facility permit is revised in a way that materially increases the potential for fires, explosions, or releases of hazardous waste constituents, or changes in the response necessary in any emergency
- The Contingency Plan fails in an emergency
- The facility changes in its 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 in the response necessary in any emergency
- The list of Emergency Coordinators changes
- The list of emergency equipment changes

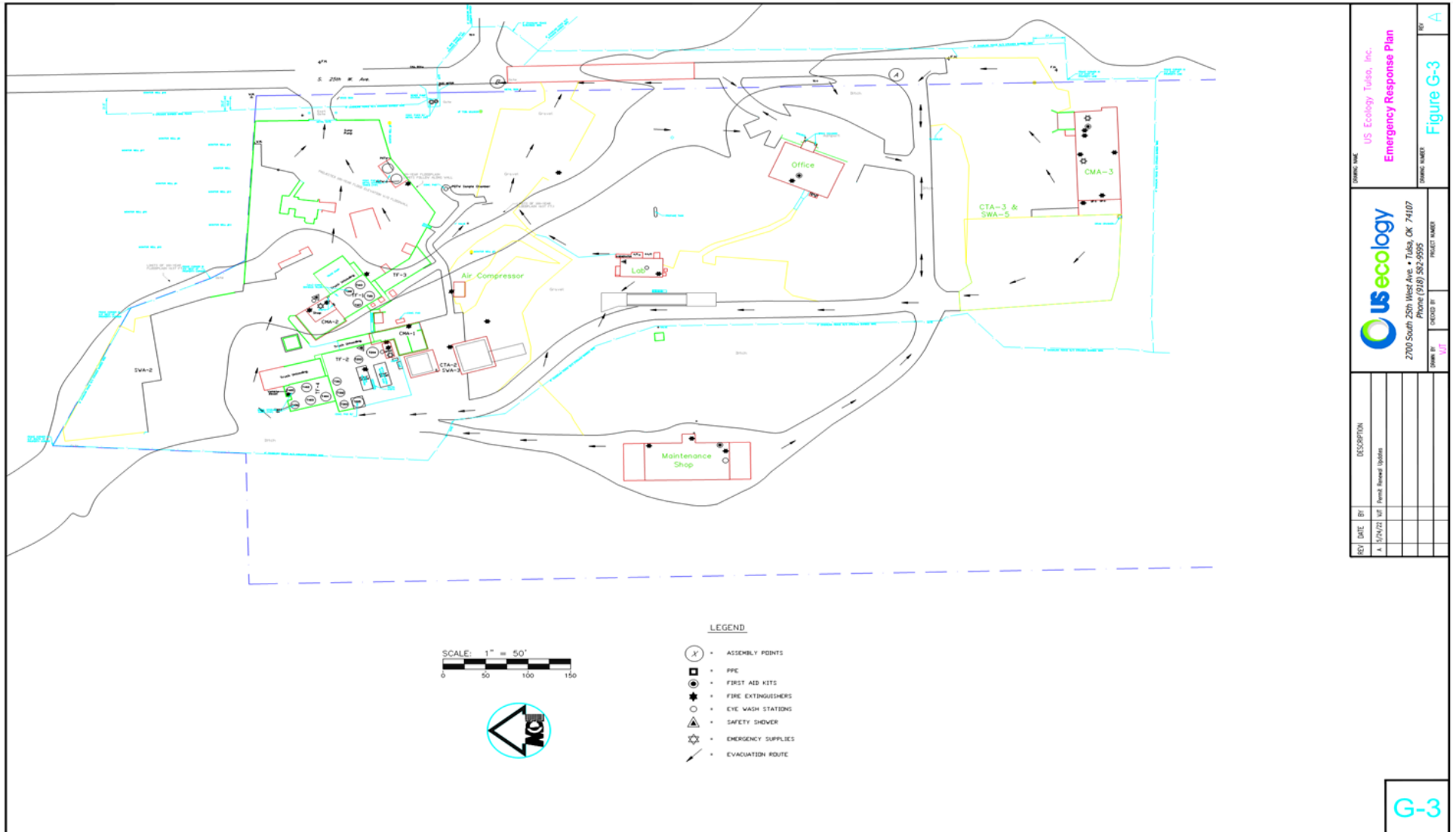
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**Appendix 1- Facility Evacuation Map with Emergency Equipment Location**



## **Appendix 2- Emergency Coordinators**

### **Primary Emergency Coordinator**

#### **Troy Cooley, General Manager**

US Ecology Tulsa, Inc  
2700 S. 25<sup>th</sup> W. Ave.  
Tulsa, Oklahoma 74107  
Office: (918) 560-5269

After Hours Contact:  
Mobile : (509) 942-9653

### **Alternate Emergency Coordinators**

#### **Megan Salyer, Materials Manager**

US Ecology Tulsa, Inc.  
2700 S. 25<sup>th</sup> W. Ave.  
Tulsa, Oklahoma 74107  
Office: (918) 560-5261

After Hours Contact:  
Mobile : (918) 938-2328

#### **Shirley Stout, EHS Manager**

US Ecology Tulsa, Inc  
2700 S. 25<sup>th</sup> W. Ave.  
Tulsa, Oklahoma 74107  
Office: (918) 560-5260

After Hours Contact:  
Mobile: (918) 520-6796

### **Attachment 3- List of Coordinating Agencies**

Berryhill Fire Department  
Dan Serman  
2900 S. 65<sup>th</sup> W. Ave.  
Tulsa, Oklahoma 74120

918/446-1211 Fire Station  
918/706-3485 Fire Chief Cell

Tulsa County Sheriff's Department  
Operations Division  
500 South Denver Avenue  
Tulsa, Oklahoma 74103

911 or  
Non-Emergency: 918/596-5601

EMSA  
141 7 N. Lansing Avenue  
Tulsa, Oklahoma 74106

911 or  
Emergency Dispatch: 918/596-3015  
Non-Emergency: 918/596-3100

Tulsa Area Emergency Management Agency  
200 Civic Center Basement  
Tulsa, Oklahoma 74103

911 or  
Non-Emergency: 918/596-9899

Hillcrest Medical Center  
1120 S. Utica Ave.  
Tulsa, Oklahoma 74104-4090

918/579-1000

Department of Environmental Quality  
3105 E. Skelly Drive  
Suite 215  
Tulsa, Oklahoma 74105

24 Hour Number: 800/522-0206  
Non-Emergency: 918/293-1600

**Attachment 4-List of Emergency Equipment**

<b>MATERIALS/EQUIPMENT</b>	<b>USES AND NOTES</b>	
Emergency Equipment (Absorbents, shovel, broom)	Absorbents collect liquids; broom and shovel may be used to distribute/collect used absorbents, etc.	Use primarily for control of large spills, and containment and cleanup of small spills. The shovel and broom can be used to move the absorbent as needed.
Flexible hoses with quick couple fittings.	Used for material transfer	Neoprene is resistant to most acids and solvents, but not all. The hoses are used for quick hook-ups to tanker and tanks or vacuuming spills or leaks and run-off/run-on from the facility.
Fire extinguishers.	Dry chemicals may control flammable liquids, gases, and electrical fires.	Kept in the office, laboratory, treatment area, CMA-3, and in the tank storage area.
First aid supplies.	Used in minor incidents. Major injuries are referred to medical facilities in the Tulsa area.	The bulk of first aid supplies are kept in the office. A smaller amount is kept in the laboratory and CMA-3.
Bobtail and tank truck.	Has the handling capabilities to pick up, store, and transport waste.	One is used to store and transport site generated solid waste. Can be used to remove spills and contaminated fluids in the diked area.
Emergency eye wash stations and showers.	For flushing face and body when accidents occur where wastes contact the eye or body. May be used to decontaminate the whole body.	A shower is located in the tank and well area. Eye wash stations are located in the laboratory, well, and CMA-3 areas.
Respirators, face shield, and protective clothing.	Cartridges for organic vapors and gases, protective eyeglasses, coveralls, gloves and foot coverings are used.	Needed at a commercial hazardous waste facility for eye and upper respiratory protection from spills and gases.
Communication system.	The telephone and radio system are also connected to the telephone system outside the facility.	The radio system can be used as an alarm at the site in case of an emergency. The telephone can be used to call for outside help.

## **Attachment 5- Authorization for Implementation of Contingency Plan**

To Whom It May Concern:

As General Manager of US Ecology Tulsa, Inc., I hereby grant the following authority to commit all company resources (as deemed necessary) to implement the facility Contingency Plan. In the event of an occurrence which warrants implementation of the Contingency Plan, the designated Emergency Coordinator (primary and alternate) are fully authorized to implement all actions deemed necessary. This authority will not be affected by any change of my association with the company.

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Troy Cooley

General Manager, US Ecology Tulsa, Inc.

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Date