

Clean Harbors Lone Mountain, LLC 40355 S. County Road 236 Waynoka, OK 73860

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March 15, 2018

Kelly Dixon, Director Land Protection Division Oklahoma Department of Environmental Quality 707 N. Robinson P.O. Box 1677 Oklahoma City, OK 73101-1677

RE: Development and Operations Plan (Plan) Renewal Application Clean Harbors Avard Transfer Station EPA ID #: OK000070136

Dear Ms. Dixon:

Clean Harbors Lone Mountain, LLC (CHLM) hereby submits its revised Development and Operations Plan for Renewed Approval by the DEQ. This Renewal Application is submitted as required by DEQ Rules for Hazardous Waste Management, specifically OAC 252:205-15-2.

It is the intention of CHLM that the Avard Transfer Station continue to operate as it has under its existing approved Plan, as modified through March of 2013. No significant changes in design or operations are intended under this revised Plan. As before, the entire Avard Facility may be considered as a Transfer Facility as defined in 40 CFR 260.10. All regulated Transfer Station activities will continue to occur only within the existing Transfer Building.

The required submission fee check for \$3,000.00 to cover the review and processing of the Development and Operations Plan was previously submitted on March 2, 2018 (Check # 1784528).

The existing Contingency Plan Agreement forms, and the overall "D" size overall site plan are being updated and re-signed by the local responders, and will be forwarded to the DEQ as soon as they are received by CHLM.

If you have any questions or require additional information, please contact me at (847) 468-6701 or Alan Jay Adair, Facility General Manager at (580) 697-3500.

"People and Technology Creating a Better Environment"



Kelly Dixon, Director Development and Operations Plan (Plan) Renewal Application Clean Harbors Avard Transfer Station EPA ID #: OK0000070136

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

Matthew Sauvageau, Vice President, Environmental Compliance Clean Harbors Lone Mountain, LLC

Enclosure: Application, Hard copy & Digital copy on USB Drive

CC: w/enc. (Hard Copy only) Hillary Young, Chief Engineer, DEQ-LPD Mike Stickney, RCRA Programs Manager, DEQ-LPD Christopher LaPonsie, Enid DEQ Office, 115 W. Broadway, Suite 209, Enid, OK 73701-4031

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CLEAN HARBORS LONE MOUNTAIN, LLC

AVARD TRANSFER STATION

Development and Operations Plan

3/15/2018

Clean Harbors Lone Mountain, LLC Avard Transfer Facility Table of Contents

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CHLM Avard Transfer Station

Development and Operations Plan,

Section 1:

Location and Physical Description

March, 2018

Location

The Clean Harbors Lone Mountain, LLC (CHLM) Avard Transfer Facility is located in the central part of Woods County in northwestern Oklahoma, close to the Kansas border. The specific location of the site is at Section 26, Township 26 North, Range 15 West, Indian Meridian of Woods County, Oklahoma. The physical address of the Facility is 37647 Ellis Road, Alva, OK 73717.

As can be seen on the location maps and plan drawings (Figure F-1), the facility site is about one quarter (1/4) mile east of the small town/village of Avard. The site is on the south side of the Burlington-Northern Santa Fe (BNSF) railway line and its southern property boundary adjoins the county road leading into the town of Avard. The BNSF serves as the main rail line for transport of materials to and from the transfer station.

Physical Description

The surface and sub-surface geology of this region of northwestern Oklahoma contains rock units with extensive thicknesses that are suitable for surface disposal of waste. Woods County is within this geologic region, known as the Northern Shelf, where the sub-surface Tertiary and Permian rocks contain extensive units of clays and shales. The surface soils also contain deep clay and shale layers that are relatively impervious to water. Conversely, these units make poor water-bearing formations, rendering the area even more suitable as a site for waste management activities, although the only waste management activity at the site is the transfer of waste between shipping containers.

The Avard Transfer Facility lies on a tract of land east of the now-unincorporated town of Avard. The size of the property as originally approved was about 56 acres and stretches between the BNSF railroad on the north and the county road on the south. In 2012, the Avard Transfer

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Station Plan Approval was modified to cover an additional 42 acres for the construction of a 6,816 foot rail loop siding so additional rail traffic could be managed. Total acreage is now approximately 98 acres. The topographic features of the land can be described as relatively flat with a small (0. 60 %) slope to the northwest. The existing features and topography of the property typify the common use of the surrounding areas, mostly that of pasture with limited farming of forage crops. The main crop grown for livestock forage on the flat, least-eroded areas is sorghum.

The underlying soils of the area are of the Vernon series. Specifically, the site is underlain by Vernon clay. The northern two-thirds of the site is underlain by the Vernon clay of the level phase and the southern one-third by Vernon of the eroded phase. This clay is highly erodible when dry, bare, and exposed to the effects of wind, or when wet with little vegetative cover and exposed to the effects of water. The site clay is relatively impervious and run-off can be extensive unless the site is properly managed. The existing portion of the facility is generally confined to the eastern area of the. This section is covered with thick grass, except for the areas under the rail spurs, the structures, and roadways where no signs of erosion are apparent at this time. Gravel or concrete paving generally covers operational areas. Erosion has not been an issue over the approximate 25-year life of the facility.

As indicated above, the surface slope and drainage direction is toward the northwest part of the site. There is a small pond at the northwest corner of the site which was constructed on the small intermittent creek which drains the area north to the Eagle Chief creek. Eagle Chief Creek is the main drainage of the surrounding area and drains east-southeast of the property. Surface water eventually enters the Cimarron River near Orienta.

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The hydrology of the site is such that, theoretically, there could be surface and subsurface moisture deficits during some time in a given season. The average annual precipitation in the area is about 24 inches whereas the average annual lake evaporation is about 63 inches. The average annual run-off is estimated at about 1.5 inches. (2)

References

- 1. Soil Survey- Woods County, USDA/Okla. Agr. Exp. Sta. No. 7, 1939 Series.
- 2. Disposal of Industrial Wastes in Oklahoma, OGS. Circular 80, 1980.
- Hazardous Waste Management Regulations, OAC 252:205, <u>Hazardous Waste</u> <u>Management, as last amended September 15, 2017</u>.
- Geologic Investigation of Proposed Transfer Sites at Avard, Waynoka, and Belva, Edwin Ullmef, 1990.
- 5. Avard Transfer Facility, Transdevelopment Corp. 1988.
- 6. Federal Regulations, 40 CFR 264, 265 and 270, as of July 1, 2016.



CHLM Avard Transfer Station

Development and Operations Plan,

Section 2:

Siting Criteria

March, 2018

Siting Criteria

As an existing site requesting renewal of its D & O Plan Approval, the siting criteria of O.S. Title 27A-2-7-111, and OAC 252:205-11-2 do not apply to this application. For informational purposes, however, the applicable text from the original application is shown below.

"The Avard transfer station is located in an area that does not overlie an aquifer of good quality, fresh water used by farmers or ranchers in the vicinity. The facility is not within a recharge area to a major aquifer. There are no known tectonic fault zones or local fractures at or near the site. As was stated earlier, the facility is within an area of surface clays and subsurface shales. In accordance with the State of Oklahoma exclusionary standards for hazardous waste disposal facilities (310:270-11-4) and Circular 80 of the Oklahoma Geological Survey (2), the site is not within an excluded area, but is in an area that has the rock units which would make it suitable for a surface disposal site. As such, it is more than adequate for a waste transfer facility.

"USPCI has conducted profile soil investigations at the site, and at least three (3) boreholes (to a maximum depth of 28 ft.) were drilled for the investigation. These boreholes were converted into monitoring wells for further observations (4). The borehole samples showed that the profile contained clay redbeds of the Flowerpot Shale Formation. No alluvium or terrace deposits were encountered. Copies of the bore logs are included as Attachment l."

NOTE: The boreholes remain open as of the submission date, but have never shown any water sufficient for sampling.

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ATTACHMENT 1 to:

SECTION 2 – Siting Criteria

BORING LOGS OF MONITORING WELLS

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References

- Soil Survey- Woods County, USDA/Okla.Agr. Exp. Sta. No. 7, 1939 Series.
- Disposal of Industrial Wastes in Oklahoma, OGS. Circular 80, 1980.
- Hazardous Waste Management Regulations, ODH Bulletin No. 0525, 10/5/1992.
- Geologic Investigation of Proposed Transfer Sites at Avard, Waynoka, and Belva, Edwin Ullmer, 1990.
- 5. Avard Transfer Facility, Transdevelopment Corp. 1988.
- 6. Federal Regulations, 40 CFR 264, 265 and 270.



CHLM Avard Transfer Station

Development and Operations Plan,

Section 3:

Site Access, Hours of Operation, and Security Provisions

March, 2018

Site Access

Access to the Transfer Facility will be through gates on the north and south boundaries of the property. The rail spur extending from the BNSF mainline into the facility from the north, and connects with the rail loop and the two shorter North-South spurs; the eastern spur (Spur #1) runs through the transfer building. Entrance to and exit from the active portion of the facility for all other normal highway traffic (except construction) will be directed from the southern boundary where there will be gates. Vehicular traffic will be able to access the facility easily on the south from the existing county road (Ellis Road). Truck turn-around and parking areas have been included in the design of the active area of the transfer facility.

As can be seen on Figure 3, rail access to the transfer building will be from the north on Rail Spur #1 (RS #1). The incoming rail cars containing hazardous waste will be "driven" along RS #1, as needed, or to the end of the spur. Unloading will take place as the cars are driven in from or backed along the spur back onto the main BNSF railway. The empty rail cars will be cleaned according to standard practice before they leave the building and/or the property. (See Section 7)

Flatbed rail cars holding containers (e.g., rolloff boxes, etc.) of hazardous waste will be driven onto Rail Spur #2, immediately west of the transfer building. The containers will be transferred to highway vehicles by an industrial lift (e.g., forklift, "Piggy-Packer", etc.), as appropriate. Rail cars containing hazardous waste may be temporarily parked on any of the rail spurs, as needed, but gondola cars will be moved into the transfer building for unloading. Manifested shipments of hazardous waste may only remain on the site for a maximum of ten (10) days.

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Rail cars containing non-hazardous waste (e.g., PCB Mega Rule wastes) will also access the site through the north rail gates, and will be routed onto the rail loop for parking or unloading.

Hours of Operation

Operations are conducted "as needed, " ordinarily on a daily (one shift) basis. However, the facility is fully equipped for 24-hour a day, seven day a week operation should the volume of incoming waste demand it and the available capacity allows it. The nearest residential structure is approximately 1/3 of a mile away from the rail spurs, night-time operations will not affect nearby residents.

Security Provisions

The CHLM Avard property will be entirely fenced with barbed wire fencing around its perimeter. In addition, the active areas (i.e.; the transfer building, truck parking, and the rail spurs where the loaded cars may be parked/stationed prior to their unloading), will be secured' with chain link fencing. CHLM will also provide security per- 40 CFR 264.14. During hours of operation, the facility will be manned by personnel who can prevent the unknowing entry and minimize the possibility for unauthorized entry. When the facility is unattended, the facility gates will remain locked. Signs with the words "DANGER – Unauthorized Personnel Keep Out" will be posted at each gate and along the chain link fences of the facility.



CHLM Avard Transfer Station

Development and Operations Plan,

Section 4:

Details of Buildings, Ramps, On-Site Roads, Waste Transfer and Holding Areas, and Equipment Used On-Site

March 2018

Details of Buildings and Ramps

The transfer station is a metal building with a concrete floor (Figure 4). The rail ties are set in the slab, with a drive way next to the rail for the trucks to be able to drive through the transfer station. There is a minimum of 30 feet vertical opening into the building. The building walls extend from floor the floor to the roof-line on both sides. The building is open on both ends to facilitate truck traffic through the building and is approximately 118 feet in length.

There are doors on both ends that can be closed as needed to contain particulates for particularly dusty materials. There are also four (4) ventilation fans inside the building, which may be used to pull in particulate matter, through filters; these exhaust through vents in the building ends.

Metal Ramps are available for the trackhoe/backhoe to use for positioning itself on the rail cars in the building. Eight (8) fixed earthen/timber ramps have been spaced around the outside of the rail loop. There are no ramps needed on RS #2, the western rail spur, as all containers will transferred from the railcars to flatbed trucks by industrial lifts.

On-Site Roads

The transfer facility sits on the north side of the county road with only one (1) main loop road to enter and exit the facility (Figures 2 and 3). Temporary or part-time use roads may be used, especially if additional construction occurs. The main road enters the facility and leads to the Office and transfer station portion of the transfer facility. Traffic is planned to exit the transfer station around the Decontamination Building and Office and return to the county road along the other leg of the loop road. There also exists another road which parallels and is immediately adjacent to the rail loop on the inside. When the rail loop is in active use, this road is covered with HDPE liner material to contain any waste material which may be dropped by the trackhoes (See Section 7)

Additional on-site roads may exist to allow employees access to the outer areas of the transfer facility. For example, a task may require site personnel to perform a work activity where the rail spur enters the transfer facility. These additional roads will not be utilized for waste transference activities but only for routine work activities.

Waste Transfer and Holding Areas

Hazardous waste which is transferred between containers will only occur in the transfer building and may be held in the transfer facility for only short periods of time (i.e.; 10 days). Wastes in containers may be transferred to/from highway vehicles using RS #2, as well. Only Non-Hazardous wastes, including PCB "Mega-Rule" wastes, are transferred between containers on the rail loop.

Additionally, highway shipping containers will be staged in the areas around the transfer station and transfer facility, as necessary, prior to shipment off-site or transfer into or onto rail containers for shipment off-site. These holding areas typically will be close to the Office and transfer station but are not required to be. Waste being held in the holding areas of the transfer facility will be monitored through the Inspection Program to ensure waste is not held greater than ten (10) days at the transfer facility.

The interior area of the rail loop has no designated purpose, but will be used as convenient to business operations. As of the spring of 2018, a number temporary housing units are positioned there, providing accommodations as needed for on-site workers, travelling or temporary CHLM employees, etc. working temporarily in the area. In the past, some have been used by Clean

Harbors employ workers to alleviate the housing shortage in the oil field during "booms." Equipment storage, including storage buildings, may also occur. The space could conceivably be used for temporary bulk storage of commodities or equipment used in the area. Additionally CHLM may allow an outside entity to transfer non-waste commodities or equipment by use of the rail sidings on the site, provided such action does not interfere with CHLM waste operations.

Equipment Used On-Site

The equipment used on-site is primarily for the transfer of waste from rail shipping containers to standard highway shipping containers and vice versa. Typical equipment located at the transfer facility may be backhoes, trackhoes, clamshells, cranes, skid-steer loaders, front-end loaders, "Piggy-Packers", dump trucks/ trailers, tankers, hoist trucks/trailers, pin trailers, flat bed trailers, forklifts, packers, pumps, hoses, etc., as necessary for the transfer of waste materials. The list of equipment used on- site will not be limited to this list of equipment so as not to limit the transfer operations at the transfer facility.



CHLMCHLM Avard Transfer Station

Development and Operations Plan,

Section 5:

Spill Control and Containment Measures

March, 2018

Spill Control and Containment Measures

The transfer station is equipped with dust suppression and ventilation systems (air filters) such that fugitive dust emissions are minimized. Any solid waste falling on the building floor is swept, scooped, absorbed, etc., and collected into appropriate containers. Waste storage is not allowed except for a very limited time (i.e.; 10 days or 90 days), as allowed by 40 CFR 263.12 or 262.34 and the DEQ Rules for Hazardous Waste Management.

The transfer building will be enclosed on all sides except for the 2 feet high louvered openings along the sides and the entrance and exit ends of the building, so that most rainfall will not contact the waste being transferred. Also, precipitation run-off from the transfer area will be virtually eliminated. The building floor has been constructed of concrete with a containment curbing along its entire perimeter. The floor slopes towards the corner of the building. Spills and washings which may occur will drain to the corner of the building where they can be removed by pumping, etc. The capacity of the concrete secondary containment area will be 24,000 gallons, a volume equal to or greater than the largest liquid tank car which could be located within the transfer station.

The truck parking areas and the driveways outside the building are designed and will be constructed to drain northward. Run-off from these areas will be retained within a run-off retention pond located between the rail spurs (Figure 3). The pond will be north of the transfer building. The retention pond can also function as an emergency containment area, and it has been built with a capacity in excess of the design storm water run-off.

The run-off retention pond located between the rail spurs will be sampled and analyzed quarterly forTotal Organic Carbon (TOC), Total Organic Halides (TOX), and Total RCRA Metals, when water is present. Based on the historical sampling data collected and any observed

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identifying trends (i.e., effects of evaporation, etc.), CHLM will propose action levels to the DEQ which, if exceeded during subsequent quarterly sampling, will trigger implementation of the next tier of investigation. No contamination has ever been found in the pond. During the previous 3 year period 2015 - 2017, sampling results have been determined to be below the reporting limits with only a few observations as follows:

AVARD POND - 2015 thru 2017 Sampling Background								
Parameter/ Analyte	EPA Method	Background Result (ppm)						
тос	SM5310 B-11/ SW-846 9060A	1.4 - 32.7*						
тох	SW-846 9020B	0.029 - 0.057*						
Antimony	SW-846 6010C	<reporting (rl)<="" limit="" td=""></reporting>						
Arsenic	SW-846 6010C	0.099**						
Barium	SW-846 6010C	0.038**						
Beryllium	SW-846 6010C	<reporting (rl)<="" limit="" td=""></reporting>						
Cadmium	SW-846 6010C	<reporting (rl)<="" limit="" td=""></reporting>						
Chromium	SW-846 6010C	<reporting (rl)<="" limit="" td=""></reporting>						
Lead	SW-846 6010C	<reporting (rl)<="" limit="" td=""></reporting>						
Nickel	SW-846 6010C	<reporting (rl)<="" limit="" td=""></reporting>						
Selenium	SW-846 6010C	<reporting (rl)<="" limit="" td=""></reporting>						
Silver	SW-846 6010C	<reporting (rl)<="" limit="" td=""></reporting>						
Thallium	SW-846 6010C	<reporting (rl)<="" limit="" td=""></reporting>						
Vanadium	SW-846 6010C	<reporting (rl)<="" limit="" td=""></reporting>						
Zinc	SW-846 6010C	<reporting (rl)<="" limit="" td=""></reporting>						
Mercury	SW-846 7470	<reporting (rl)<="" limit="" td=""></reporting>						
*Multiple background re	*Multiple background results with low and high result represented.							
** Single background result which is below levels found as naturally occurring in soil.								

Exceedance of the RCRA metals action levels will require additional confirmatory metals sampling and analysis. A proposal describing additional actions to be taken, including remediation if deemed necessary, will be submitted to the DEQ within 90 days of receipt of the re-sample data confirming the observed metals exceedance. If the organic compound action level is exceeded, CHLM will sample and analyze for TPH/BTEX and/or VOC. If this data is insufficient to address the observed exceedance of the action level, sampling and analysis for Appendix IX organic compounds, minus dioxin compounds, will be performed. If the additional sampling and analysis

indicates that significant concentrations of organic compounds are present, a proposal describing additional actions to be taken, including remediation if deemed necessary, will be submitted to the DEQ within 90 days of receipt of the confirmatory data. Pending DEQ review and approval of the proposal, further actions will be determined on a case-by- case basis.

CHLM will acquire a National Pollutant Discharge Elimination System (NPDES) discharge permit from the regulatory agency to allow discharge of any excess storm water, if necessary. To date, this has not been necessary.

Run-off from the rest of the property will also normally be retained within a pond in existence at the northwest corner of the property. CHLM plans to retain this pond strictly for purposes of conservation. The facility may have good uses for this water (e.g.; road watering for dust suppression) during the hot summer months and simultaneously conserve the water from the rural water system.



CHLM Avard Transfer Station

Development and Operations Plan,

Section 6:

Solid and Hazardous Waste Handled/ Bulking, and Mixing Activities

March, 2018

Description of Hazardous and Solid Wastes Handled

Both hazardous and non-hazardous wastes in solid, liquid, and semi-solid physical states may be handled at the Clean Harbors Lone Mountain, LLC (CHLM) Avard transfer station. The variety of hazardous waste handled at the transfer station will be similar to the waste permitted for management at the CHLM Lone Mountain Facility. In addition, waste destined for other treatment, storage, disposal, and/or recycling facilities may be handled at the transfer station.

Typically, the waste handled at the transfer station will be contaminated soils, contaminated debris, multi-source leachate, large quantity generator wastestreams, etc. However, other types of waste may also be handled at the transfer station.

Waste Bulking Procedures Including Associated Compatibility Analyses

The waste arriving at and departing from the transfer station may be bulked to utilize rail shipments more efficiently and enable CHLM to fill shipping containers to their capacity. Waste types which may be bulked are contaminated soils, contaminated debris, leachate, and the same waste type from the same generator. Bulking activities involving similar waste types from different generators may be performed.

Prior to any bulking activities, the container will be inspected to ensure it is free of residues of any previous, potentially-incompatible waste. Prior to compatibility testing, shipping documents, acceptance documents, etc. will be reviewed to evaluate potential incompatibility. If there is no indication of significant incompatibility in those records, representative samples of the wastes to be bulked together will be mixed and observed to ensure their compatibility. If the wastes demonstrate potential incompatibility, they will not be bulked together. Some examples of waste incompatibility are the generation of significant amounts of heat, large amounts of precipitate, unacceptable increases in viscosity, and undesirable layering.

Provisions to Prevent Mixing of Hazardous With Non-Hazardous Waste

Prior to any waste transferring activities, the waste to be transferred will be identified by the use of shipping documents, acceptance documents, etc. These documents will identify the generator as well as whether the waste is hazardous or non-hazardous. Normally, hazardous and non-hazardous wastes will be managed (bulked, shipped, etc.) separately. However, if hazardous and non-hazardous wastes are mixed, they will be managed appropriately as hazardous waste.



CHLM Avard Transfer Station

Development and Operations Plan,

Section7:

Waste Handling Activities and Holding Capacity, Waste Management Tanks/Containers, Waste Transfer Procedures, and Truck and Equipment Cleaning and Decontamination

March 2018

Waste Handling Activities and Holding Capacity

Both hazardous and non-hazardous wastes in solid, liquid, and semi-solid physical states may be transferred at the U.S. Pollution Control, Inc. (CHLM) Avard transfer station. The waste may arrive at and depart from the transfer station in intermodal containers, such as rail gondola cars, tankers, flat cars, cargo tankers, gondola boxes, vans containing drums, bags, boxes, etc. The transfer activities may include direct pumping of liquids from a cargo tanker to a tanker truck, using a backhoe or clamshell to transfer solid waste from a rail gondola car to a dump trailer, etc. The standard highway containers into which waste may be transferred are tanker trucks, dump trailers, gondola boxes, vans, / etc. Hazardous waste trans-loading activities will occur only in the Transfer Building.

Due to contract requirements with certain generators, special requirements apply to the handling and management of PCB Mega Rule wastes on the rail loop. These requirements are all contained in Attachment 1, "Bulk Solids Rail Transfer Standard Operating Procedure For Mega-Rule Wastes," Clean Harbors Document # 68LG-1013. This document was last revised in April of 2014; any further revisions will be provided to the DEQ prior to implementation.

The waste holding capacity of the transfer station is affected by the type of standard containers received, as well as the type of standard containers into which the waste will be transferred. Typically, the transfer station building will hold two rail cars (approximately 100 tons each) and two semi-trucks and trailers (approximately 25 tons each). Thus, a maximum total of 250 tons of waste could be present in the transfer station building at any time.

Waste Management Tanks/Containers

Although some waste could be "stored" within the transfer building, CHLM will not use the building for true hazardous waste storage (i.e.; greater than 10 days for transfer operations or greater than 90 days for on-site generated waste). Indeed, true long-term "storage" of any waste at the facility is not intended. Empty containers and boxes will usually be stored in the parking areas and temporarily within the transfer building. However, transferred hazardous waste will be shipped to the designated treatment, storage, disposal, and recycling facilities within ten (10) days of receipt at the Avard Facility. Site generated waste, such as clean-up of spilled waste, may be accumulated temporarily in containers for up to 90 days under 40 CFR 262.17 while awaiting transportation to an appropriate facility.

Waste Transfer Procedures

All loose bulk hazardous waste transfer station operations into open containers (e.g., dump trucks/trailers) will be conducted inside the transfer building shown on Figures 4 and 5. Solid or hazardous waste unloading from rail containers and loading into the highway containers may be done with track or wheel type hoes with 1-3 cubic yard buckets. Containerized bulk hazardous waste (gondola boxes, vans, etc.) may be transloaded from rail cars onto flatbed trucks on RS #2. Non-hazardous waste, including PCB Mega Rule Waste, will be transferred on RS #1, RS #2 or the rail loop. The hazardous waste transloading operation is only restricted to the railspur RS #2 and the non-hazardous or PCB Mega Rule Waste is not restricted and transfer operations can be conducted on railspur RS #1, RS #2 or anyplace on the rail loop within the facility.

Transfer of liquid hazardous wastes will also be carried out within the transfer building by direct connection of the rail tank cars to tank trucks. Any spills, leaks, etc. which may occur will be recovered and placed into the appropriate containers. Alternatively, the spillage could be absorbed, wiped up, etc., and placed into other appropriate containers for disposal.

7-3

Truck and Equipment Cleaning and Decontamination

Routinely, thorough truck and equipment decontamination activities will not be performed. However, truck and equipment cleaning will be carried out, as necessary, so that waste should not leave the transfer building containment structure or facility, and the containers meet the standards of being "RCRA empty". Equipment used in the hazardous transfer station (i.e., excavators, tools, etc.) as a primary tool are only used in this area and they do not leave the building or hazardous waste designated area. Trucks hauling hazardous waste in containers from the facility are cleaned at the Clean Harbors Lone Mountain facility.

Prior to the loading of a highway container, it will be inspected to ensure it is free of any potentially-incompatible waste. Should incompatible waste be present in a container, it will either be returned to the Lone Mountain Facility where a thorough cleaning of the container will be performed, or the container will be cleaned on-site to remove the potentially incompatible waste. The filled highway containers will be inspected for waste residue on the exterior of the container. Should any residue be found, the container will be scraped, brushed, and/or swept such that the possibility of a waste release to the environment by the transporting and/or moving of the containers from the transfer building or the facility will be minimized.

Incoming rail car containers holding bulk liquid waste will be pumped or otherwise emptied until they meet the definition of RCRA empty. Incoming rail car containers holding "solid" material will be emptied and then scraped, brushed, and/or swept in the interior to ensure the container is RCRA empty. Residual material removed from a container will be placed in a drum or other appropriate container and appropriately disposed. Out-going rail car containers will be inspected to ensure that there is no residual waste on the exterior of the containers. Should any residue be found, the container will be scraped, brushed, and/or swept such that the possibility of a waste release to the environment is minimized.

Equipment cleaning will be performed in the same manner as an out-going bulk container. It will be scraped, brushed, and/or swept to remove waste residue on the exterior of the equipment such that the possibility of a waste release to the environment by the transporting or moving of equipment from the transfer building or the facility will be minimized.

Occasionally, water may be used to wash a portion of a truck or piece of equipment. However, there will not be any regular need for "decontamination" of the trucks, rail cars, or equipment other than the standard cleaning defined above which will be conducted within the transfer building. The building and equipment, such as the air filters and collection spots or areas, will be swept and cleaned, when necessary. After being emptied, rail cars and trucks will be cleaned such that they are RCRA-empty and/or an appropriate manifest will be carried.

ATTACHMENT 1 to

Section 7:

Bulk Solids Rail Transfer Standard Operating Procedure For Mega-Rule Wastes

Clean Harbors Document # 68LG-1013

For the Avard Rail Loop



Bulk Solids Rail Transfer Standard Operating Procedure For Mega-Rule Wastes 68LG-1013 Lone Mountain Avard Railsite Waynoka, OK
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Appendix 4: Inspection Form Examples



ENVIRONMENTAL SERVICES

IIILE:					
Bulk Solids Rail Transfer For Mega-Rule Wastes					
Facility Lone Mountain Facility,	Prepared by: Brad Beck	SOP Number:	Page 3 of 7		
Avard Rail Site		68LG-1013 Avard	-		
Reviewed By: (initial beside your name)	Title:	Issue Date: July 19,	2010		
Ryan Taylor	Health and Safety Manager	-			
Duane Hayes	Operations Manager				
Approved By: (initial beside your name)	Title:	Last Review Date: A	April 9, 2014		
Alan Jay Adair	General Manager				

1.0 Objective

This SOP is to provide the guidance and necessary steps to standardize the process of transloading bulk solid waste streams from a rail gondola car into a highway transport container. The procedures apply to all personnel who perform these tasks. The procedure below will provide the steps to meet this objective.

2.0 Site Specific Terms

- Piggy Packer
- Bulk Rail Container
- Gondola Car
- Trackhoe
- Frontend Loader

3.0 **Responsibilities**

General Manager

The General Manager designee will ensure that all employees are trained and knowledgeable regarding the proper operating procedures used during bulk solids transferring.

Supervisors

The supervisor and/or lead foreman or designee for this process is responsible for training, monitoring, and for enforcing this procedure with the employees, and for ensuring all equipment and required PPE are available to the employees. The rail location coordinator or designee is responsible for scheduling the movement of rail cars into and out of the rail transfer facility.

Employees

Employees are responsible for adhering to safe work practices and all provisions found in this procedure. Employees must inspect equipment and report any failures or deficiencies to the appropriate Supervisor.

TITLE:	SOP No.:	Page
Bulk Solids Rail Transfer For Mega-Rule Wastes	68LG-1013 Avard	4 of 7

4.0 **Prerequisites**

The following prerequisites must be completed prior to performing this procedure.

Health and Safety

- Any incidents, including near misses or spills, are to be reported immediately to the supervisor.
- Review the Job Hazard Analysis (Appendix 1) to become familiar with the hazards associated with this process.
- The buddy system (e.g., visual, audio contact, etc.) must be maintained when this process is being conducted.
- If available and/or required, utilize fall protection.

Environmental

- Incidental releases are to be cleaned up immediately in the process designated PPE.
- Exercise caution to prevent any spills during the unloading process.
- Report any spills immediately to the appropriate Supervisor.
- Any spills are to be cleaned up immediately and disposed of properly.
- In the event of a large spill, the Contingency Plan may need to be implemented.

Documented Training

- HazWoper training
- OSHA regulated substances, as required (e.g., asbestos, arsenic, lead, etc.)
- RCRA training
- SOP training (Appendix 2)
- Equipment training (e.g., trackhoe, front end loader, piggy packer, etc.)
- Job specific training on the appropriate transferring techniques or activities.

Operations

- The employee must check the railcar's number on the paperwork with the number on the railcar to ensure the correct railcar is designated for loading/unloading operations.
- Ensure that all preventative maintenance on equipment has been conducted.
- All bulk solids transfer activities from rail car gondolas must occur onsite.

5.0 Procedure

5.1 Receiving

All waste entering the facility must be properly identified before any processing can begin. Personnel who will be transferring the waste from the rail container into a highway transport container must ensure that all proper documentation arrives with the load or is otherwise readily available. This will include, at a minimum:

• Waste Data Sheet or Waste Profile

TITLE:	SOP No.:	Page
Bulk Solids Rail Transfer For Mega-Rule Wastes	68LG-1013 Avard	5 of 7

Customer Service or appropriate personnel will provide the most current date waste data sheet or profile electronically or hard copy.

5.2 *Waste Tracking*

Waste tracking for the waste to be sampled will be provided by the following documents:

- Hazardous Waste Manifest or Bill of Lading
- Waste Profile

5.3 Material Processing Operation

5.3.1 Pre-Operational Inspections

- Appendix 3 must be completed by the Rail Supervisor for each generator waste stream to be transferred
- A safety meeting with all affected personnel conducting the transfer must also be conducted by the Supervisor.
- Inspect the equipment to be used to access the container for the transfer of waste (e.g., heavy equipment, manlifts, etc.).
- Inspect the following process control equipment to ensure it is ready for use for the day:
 - Portable fire extinguishes
 - Eye wash stations
 - Safety showers
 - SCBAs
 - First Aid kits

5.3.2 Procedure

Preparation for Rail Car Gondola Bulk Solids Transfer

- 1. The rail location coordinator or designee schedules the transportation of the rail car to the rail transfer facility.
- 2. Communications will be made between the facility operations and the rail location coordinator of the rail car's arrival at the rail spur.
- 3. The rail location coordinator or designee will obtain and review a copy of the manifest(s) and profile from the facility and will determine the specific PPE requirements per the PPE hazard assessments.

Rail Car At Spur

- 1. The operations personnel at the waste transfer facility will perform a basic inspection (Appendix 4 example subject to revisions as required) of the rail car gondola to ensure the following:
 - The identification numbers on the rail car match the identification numbers on the manifest.
 - Placards match the hazard class of the manifest.
 - There is no obvious damage or leaking.

TITLE:	SOP No.:	Page
Bulk Solids Rail Transfer For Mega-Rule Wastes	68LG-1013 Avard	6 of 7

Transfer Bulk Solids from Rail Gondola

- 1. A truck driver positions an empty dump truck/roll off box as indicated by the operations personnel.
- 2. Remove tarp from rail gondola.
- 3. Weep holes will either be plugged from the outside and/or a container placed under the weep holes to capture any leaking material.
- 4. The trackhoe operator, and technicians don the required PPE.
- 5. The trackhoe operator removes material from rail gondola, places it into the dump truck/roll off box.
- 6. When the rail gondola is approximately half empty, the operator repositions the trackhoe from the rail gondola being emptied to the next gondola
- 7. Laborers enter the car while ensuring a minimum distance of 10 feet is maintained beyond the swing radius of the trackhoe.
- 8. Once the trackhoe is repositioned, the operator completes emptying the rail gondola.
- 9. When the trackhoe operator can no longer remove material from the rail gondola, the bucket is positioned inside the rail gondola and the trackhoe is shut down.
- 10. The remaining contents of the rail gondola are swept up and placed inside the trackhoe bucket to ensure the rail gondola is RCRA empty.
- 11. The gondola is then swept or scraped with brooms and hand tools to loosen any residual material that may have adhered to the sides, corners, weep holes and foot wells of the rail car.
- 11. The gondola is then vacuumed using an industrial vacuum and hand tools to remove any remaining material. All vacuumed residue will be properly managed and disposed of with the load.
- 12. Weep-hole plugs are removed, if necessary, and the weep holes vacuumed.
- 13. A designated operations personnel performs a visual inspection to confirm the cleaning and then completes the inspection documentation.
- 14. The operator will reposition the empty rail gondola and position the next rail gondola to be unloaded. This process is repeated for each rail gondola to be emptied.
- 15. At the end of the transfer operations, the rail gondola with the trackhoe is secured.

Loaded Dump Trucks/Roll off Boxes

- 1. A full rail car gondola will fill up to four or five dump trucks and up to eight roll off boxes, depending upon the size. After a dump truck/roll off box has been filled, the next dump truck/roll off box is positioned into place to continue the rail gondola transfer operations.
- 2. Once a dump truck/roll off box has been filled, a tarp is secured over the load and the driver is to obtain a manifest for the load.
- 3. The driver is directed to transport the material to the CHES receiving facility.

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5.3.3 Process Interruptions

The Operator will immediately secure all loading/unloading operations in the event of an equipment failure, incompatible reaction, or fire.

- Secure the trackhoe on the railcar if safe to do so. Notify the appropriate Supervisor immediately.
- The appropriate Supervisor may opt to initiate the facility's Contingency Plan in the event of a fire or spill.

5.3.4 Shut Down

- Once the last dump truck/roll off box has been filled and the rail gondola has been emptied, the area is to be cleaned up
- Any waste that is cleaned up is to be put into the last dump truck/roll off box.
- A tarp is secured over the dump truck/roll off box.
- Cleaning equipment will be placed in proper storage containers.
- Trackhoe secured and shut down.
- The driver obtains a manifest and is directed to the CHES facility for delivery of the waste.

6.0 **Consequences of Deviations**

In addition to the process interruptions which can occur, the following additional consequences of deviations could result:

- Injuries and/or fatalities
- Property damage
- Regulatory violations and/or fines
- Damaged public relations and/or customer relations
- Disciplinary actions up to and including termination

7.0 Appendices

- Appendix 1: Job Hazard Analysis
- Appendix 2: SOP Procedure Quiz
- Appendix 3: CHES Transfer Station JHA/JSB
- Appendix 4: Inspection Form Examples



JOB HAZARD ANALYSIS

Document Control ID:		JHA Control I	D:
68LG-1013		[68LG-10	013]
Form Revision Date:	JHA Revis	ion Date:	JHA Revision #:
05-Feb-2014	[]		[]
Owner:			

SECTION 1: JOB/TASK/PROCESS	Document General Information Below)		
FACILITY/CLIENT LOCATION: CH BRANCH CODE:	FACILITY PROCESS AREA/CLIENT PROJECT	PROJECT DATE:	JOB CODE /PERMIT #:
		4/03/2014	68LG-1013
SCOPE OF WORK:			DURATION OF PROJECT/TASK:
Bulk Solids Rail Transfer For Mega-Rule Wastes			
JOB HAZARD ANALYSIS LED BY (Print Name):	TITLE:	ORIGINAL ANALYSIS DATE:	REVISION DATE:
Jeff McOsker	Plant Foreman	4/03/2014	04/03/2014
JOB HAZARD ANALYSIS REVIEWED BY (Print Name):	TITLE:	APPROVED BY:	TITLE:

SECTION 2: Chemical/Physical/ Biological Hazards (Describe Job Hazard Agents Identified)				
Chemical Agents (HAZCOM/ WHMIS MSDS Review)Physical AgentsBiological Agents				
	Heat Stress			

SECTION 3: PPE H	HAZARD ASSESSMENT SUMMARY
Head	Hard Hat Side Impact Hard Hat DOT Approved Helmet Lock-On-Life Support Helmet
Eyes/Face/Neck	Safety Glasses with Side Shields Goggles – Chemical Goggles – Dust Face Shield Welding Helmet Balaclava (F.R.) Other: Goggles – Dust Face Shield Welding Helmet
Respiratory	Dust Mask Half Face Respirator/Cartridge Type: Image: Full Face AP Respirator/Cartridge Type: PAPR/ Cartridge Type: Image: SABA Image: SCBA Other: Image: SCBA Image: SCBA
Ears/Hearing	Ear Plug Ear Muff Double (Combination Ear Plugs & Ear Muffs) Other: Other:
Hands/Arms	☑ Cotton Gloves ☑ Leather Gloves □ Puncture/Cut Resistant □ PVC □ Nitrile □ Anti-vibration □ Impact Protection □ Thermal □ Sleeves □ Wristlets/Type: □ Other:
Body	Fire Retardant Coveralls/Uniform Chemical Protective Clothing/Type: Tyvek/Type: Apron Sleeves Life Jacket/Vest High Visibility Vest Heat Reflective Suit Foul Weather Gear Cool Vest Kevlar Cut Resistant Suits Other:
Feet	Safety Boots – Leather or Rubber Image: Metatarsals (Feet & Shin) Ice Cleats (Slip-Overs) Booties/ Type: Other: Image: Metatarsals (Feet & Shin) Ice Cleats (Slip-Overs) Image: Metatarsals (Feet & Shin)

	-
Cloan	arhore
<u> </u>	

JOB HAZARD ANALYSIS

Document Control ID:		JHA Control I	D:
68LG-1013		[68LG-1013]	
Form Revision Date:	JHA Revis	ion Date:	JHA Revision #:
05-Feb-2014	[]		[]
Owner:			

SECTION 4: HAZARD ANALYSIS PROCESS (Document Hazard Analysis and Controls Based on each Job Step/ Task Sequence)						
 Loose fitting clothing; hooded garments (hoodies) w/ drawstrings; jewelry and or long hair 	Caught in rotating equipment, moving or energized parts of machinery, equipment or tools		Must not wear loose fitting clothing, hooded garments (hoodies), jewelry; long hair Not a hazard to the job task	□ Long-sleeved clothing or jackets with cuffs, long pants or coveralls; Hair must be tied back; jewelry removed □ N/A		

S	equence Of Job Steps/Tasks (Number)	Hazards/Potential Hazards & Effects (What could go wrong?)	Recommended Hazard Control Or Safe Job Procedures (How can harm be prevented?)	Required PPE (List PPE required for each Job Step)
2			Be aware all pinch points ie. Compartment doors and lids.	Hard hat, Safety glasses, Safety boots, Leather or cotton gloves and Work uniform
3	Equipment	•	 Do not operate trackhoe when cleaning personnel are within 10 feet of the trackhoe swing radius. Deactivate trackhoe controls while ground crew personnel shovel residual material into bucket. 	
4	Cleaning railcar	 Slips. Trips and Falls Pinch points/sharp edges Personnel injuries Flying particles Heat Stress 	 Be aware of personnel and equipment working around you Maintain 3 point contact while climbing in and out of railcar Do not cross between railcars by walking on the knuckles Do not enter the railcar until the trackhoe has completed digging at least 50% of the railcar. Stay at least a 10 foot distance beyond the swing radius of the trackhoe. Drink plenty of fluids, be aware of heat stress signs and symptoms. Wear proper PPF 	Work Uniform Safety Glasses Safety Boots Hard Hat Leather Gloves High Visibility Vests

SECTION 5: Atmospheric Monitoring Required: Yes No [For assistance determining exposure action levels please refer to Clean Harbors' Respiratory Protection Standard - Appendix 9]						
List Substance(s) or Material(s) of	Monitoring Substance / Material Exposure Action Levels					
Concern Below:	Instrument	Level A	Level B	Level C	Level D	
NONE						

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JOB HAZARD ANALYSIS

Document Control ID:		JHA Control I	D:
68LG-1013		[68LG-10)13]
Form Revision Date:	JHA Revis	ion Date:	JHA Revision #:
05-Feb-2014	[]		[]
Owner:			

SECTION 6. Training	(Document the required Job Task Training)

Refer to Section 4 documented training for SOP 68LG-1013 Bulk Solids Transfer For Mega-Rule Wastes

SECTION 7: Emergency Procedures (Document the Emergency Response Procedures - i.e. First Aid, Emergency Call #'s, etc.)

Yes

SECTION 8: Decontamination Procedures (Document the Decontamination Procedures –i.e. People and Equipment)

SECTION 9: Additional Job Specific Considerations:

🛛 No

SECTION 10: Job Hazard Analysis Verification (Crew Supervisor Review and Sign Off)

		Document Control ID:	JHA Control	ID:
		68LG-1013	[68LG-1	013]
Clean Hark and		Form Revision Date:	JHA Revision Date:	JHA Revision #:
Lieannardors	JOB HAZARD ANALYSIS	05-Feb-2014	[]	[]
		Owner:		

The Job Hazard Analysis Team has assessed the worksite conditions and confirms:

- The job and site specific conditions have been reviewed to ensure additional hazards have been addressed as warranted.
- The JHA addresses the significant Task Steps and applicable hazards and necessary controls.
- The Team has the appropriate resources (people and equipment) to do the job safely.
- Others that could be affected by the work have been informed.
- Energy isolation (if applicable) has been VERIFIED AND DEMONSTRATED.
- This document facilitates compliance of the PPE assessment and hazard analysis pursuant to company, legislative and client requirements.

SPRVR/PM/GM/Lead Hand/Operator (Please Print):	POSITION:	SIGNATURE:	DATE:

SECTION 11: Job Hazard Analysis Review (Work Team Reviews and Sign-Off)

NAME (Print)	Signature	NAME (Print)	Signature	NAME (Print)	Signature

Table of Hazards and Controls [This can be used as a tool to trigger situational awareness pertaining to potential Job Hazards] This Table of Hazards and Controls can assist the JHA work group to manage hazards for the proposed work. The table does not include all possible hazards and only acts as a guideline. Its intent is to aid in the JHA thought process to determine Job Task Hazards that may be present and identify implementation controls for consideration.

Pressurized Equipment	Poor Lighting or visibility	Personnel	Confined Space	Simultaneous Operations (SIMOPS)	Environment	Ignition Sources
 Perform isolation – LO/TO, blinding, or defeat Depressurize, drain, purge, and vent Relieve trapped pressure Avoid auto-refrigeration when depressurizing Anticipate residual pressure or fluids 	 Provide alternate lighting Wait or defer until visibility improves No work over water that could require rescue 	 Provide induction or training for new workers Mentor, coach, or supervise Verify competencies, skills, and experience Address applicable limitations (fatigue, exhaustion, and restricted duty) Manage multiple languages 	 Discuss confined space entry safe work practice Monitor access or entry Protect surfaces from inadvertent contact Do not locate mobile engines near confined space Provide observer Develop rescue plan 	 Interface between groups Use barriers and signs to segregate activities Have permit counter signed by leader of affected groups 	 Implement controls for slippery surfaces High winds – goggles Heat – hydration, breaks Cold – PPE, heaters Lightning – tool selection, defer work Wildlife encounters 	 Remove, isolate, or contain combustible materials Provide fire-fighting equipment Construct a fire-safe habitat Provide a fire watch during and after hot work Conduct continuous gas testing Bond or earth for static electricity or cathodic protection Intrinsically safe tools, equipment, etc?
Hazardous Substance	Potential Spills	Equipment Hot or Cold	High Noise	Falling or Dropped Objects	Lifting Equipment	Work at Heights
 Drain or purge equipment Follow MSDS controls Implement health hazards controls (Lead, Asbestos, H₂S, Iron Sulphide, Sulfur Dioxide, NORM) Test or analyze material 	 Drain equipment Provide spill containment equipment Have spill clean up materials and equipment on hand Restrain and isolate hoses when not in use 	 Heat or cool equipment before work starts Install barriers Provide warning signs Implement cold temperature and brittle failure controls Wear thermal gloves 	 Wear correct hearing PPE Manage exposure times Shutdown equipment Use "quiet" tools Sound barriers or curtains Provide or use suitable communication techniques 	 Use signs and barriers to restrict entry or access under work at elevation Use lifting equipment to raise tools to or from the work platform Secure tools (tie-off) 	 Confirm lifting equipment condition and certification Obtain approval for lifts over processing equipment Have a documented and approved lift plan 	 Discuss working at heights safe work practice Verify fall restraint and arrest equipment certification Apply abseiling safe work practice
Portable Electrical Equipment	Radiation Hazard	Moving Objects or Equipment	Manual Handling	Equipment and Tools	Vibrating Equipment	Slips, Trips, and Falls
 Inspect equipment for condition and test date currency Implement continuous gas testing Protect electrical leads from impact or damage Use GFI's 	 Use barriers and signs to restrict access Notify personnel who may be affected Implement NORM controls Conduct RAD testing 	 Confirm machinery guard integrity Provide protective barriers Observer to monitor proximity of people and equipment Shut down or lockout equipment 	 Assess manual handling task Limit load size Manage posture Confirm stability of load and work platform Get assistance or mechanical aid to avoid pinch points 	 Inspect equipment and tools No use of modified tools Use protective guards Use correct tools and equipment for task Protect or remove sharp edges 	 Manage exposure times Assess affect of vibration on equipment Use low vibration equipment Apply noise controls 	 Identify and shield uneven surface or projections Secure or cover cables, cords, and tubing Clean up liquids Barricade or rope-off openings and holes
High Energy or High Voltage	Excavations	Waste Clean Up and Disposal	Other Energy Sources	Mobile Equipment	WHAT Other Hazards	Emergency Response
 Restrict access to authorized personnel only Discharge equipment and make electrically dead Observe safe work distances for live cables Use flash burn PPE suit Use insulated gloves, tools, and mats 	 Have an excavation plan or safe work practice Locate underground pipes or cables by hand digging De-energize underground services Implement confined space entry controls Barricade/Flag open excavations 	 Apply environmental management practices Follow site waste management procedures Clean up equipment and materials at site Optimize task to minimize waste production 	 Spring compression or expansion control Implement electromagnetic (radio) controls Manage pressure or vacuum Manage heat generating processes Use seismic activity safe work practice 	 Assess equipment condition Implement controls on users or access Limit and monitor proximity to live equipment or cables Manage overhead hazards Adhere to road and site rules 3-point contact when entering/exiting mobile equip. Driver security 	 Implement abrasive blasting controls (for equipment and practices) Establish a driver journey management plan Manage potential blocked or plugged equipment MOC required for temporary connections or modifications 	 Keep egress route open Keep shower and eye wash stations accessible Have a rescue plan in place Keep emergency alarm, fire equipment, and shutdown locations unobstructed Plan for emergency first aid in place Remote Medi-vac plan in place



Appendix 2 Standard Operating Procedure Quiz

Page 1 of 1

Lone Mountain Facility 40355 S County Road 236 Waynoka, OK 73860

TITLE: Mega Rule Bulk Solids Rail Transfer

REFERENCE NUMBER: 68LG-1013

SOP PROFICIENCY REVIEW: WRITTEN

EMPLOYEE: _____ DATE OF REVIEW: _____ SCORE: ____

Complete the following true/false, multiple choice, or fill-in-the blank questions:

- 1. True False Placards on railcar must match the hazard class on the manifest .
- 2. True False Driver does not need to maintain a manifest before leaving the facility.
- 3. True False 3 point contact must be used when getting on and off equipment.
- 4. True False A Seat Belt is not needed.
- 5. True False A visual inspection is not needed to confirm the cleaning of the rail car
- 6. At the end of the ______, the rail car with the trackhoe is secured.
- 7. A ______ with all affected personnel conducting the transfer must be conducted by the supervisor.

SOP PROFICIENCY SIGN-OFF

SUP PROFICIENCE SIG				
certify that I have read the procedures required for the successful completion of the SOP quiz identified above. I also had the opportunity to discuss with the Training Department or my immediate Supervisor any questions concerning this SOP quiz prior to completing this quiz. I also understand that this SOP is a tool to be used during my on-the-job training and subsequently while performing my work job tasks:				
Trainee Signature	Date			
The SOP identified above has been discussed with the employee factory task knowledge, he/she is approved, pending satisfactory form the named operation.	e named herein. As evidenced by attaining satis- completion of the SOP task evaluation, to per-			
Trainer Signature	_ Date			

Appendix 4- Inspection Forms



Response Id: 3246953

PM Level B Header	
Asset Number	EQ1515
Inspection Date	05/04/2018 12:46 PM
Insptr ID	069349 - Robert R Robinson (ROBINSR4)
Inspection Location	68lg
Hour Meter	3409.0000
Odometer	2911
Asset Condition	Good
Repair Order #	
Completed By	
Defects Corrected	False
PM Level B Footer	
Inspector Signature	All and a second s
Asset Inspection Result	Condition of Asset is Satisfactory
Comments	do a & b at same time



Response Id: 3246936

PM Level A Header		
Asset Number	EQ1515	
Inspection Date	05/04/2018 12:44 PM	
Insptr ID	069349 - Robert R Robinson (ROBINSR4)	
Inspection Location	68lg	
Hour Meter	3409.0000	
Odometer	2911	
Asset Condition	Good	
Repair Order #		
Completed By		
Defects Corrected	False	
PM Level A Footer		
Inspector Signature	A A A A A A A A A A A A A A A A A A A	
Asset Inspection Result	Condition of Asset is Satisfactory	
Comments	inspect unit	
Certification	This vehicle has passed all the inspection items for the annual vehicle inspection report in accordance with 49 CFR 396.This vehicle has passed all the inspection items for California Biennial Inspection of Terminals (BIT) - 90 days FHWA - DOT annual inspection.This vehicle has passed all the inspection items for Maryland TR SS23-301-23-305; COMAR 11.22; FMCSR S396.17.	

Rail Inspection Entry

Note: Before Inspection: Chock Wheels, Install Blue Flag, Derail, Set Hand Brake

Car Number CIGX892789	Inspection Date 05/29/2018 05/29 Atr
Rail Car Inspection Type Rail Gondola 🗸	Owner Name
Inspection Type O Pre-Load O Post-Load O Pre-Unload O Post-L	Inload Capacity 110,0000 TON
	Empty Weight 33.0000
	Allowable Weight 143,0000
	Inspection Location
	State-Country OK-US
	Asset Condition Fair
	Inspected By
Last Name: Beck First Name: Bradley	Employee ID: 012306
Diddey	
	^
Comments	V
Only check off items that are not OK	Inspection Itoms
Car Inspection	Inspection Items
Standing - Laphia? Not Bealing?	
Deuble Shelf Courses	
	U Blue Flag in Place
	Hand Brake Set
Check for Dents, Punctures, Gouges, Leakage	Weep Holes not clogged or plugged
	Derail Set
Axies, Springs & other hardware	
Safety Appliances	
Placard holders (4)	
Hand Brake Operational	
Sill Steps and Grip Irons	
Ladders Safe	
Running Boards	
Gratings Safe	
Check Defect Card Holder	
Linit Inspection Decult	
K - Equipment requires maintenance or repair	
S - Condition or equipment is satisfactory	
	Scan/Upload Image (Maximum file size allowed 10MB)
8	
	15
	Mechanic Simature

Inspector Signature:

843

pell

Rail Inspection Entry

Note: Before Inspection: Chock Wheels, Install Blue Flag, Derail, Set Hand Brake

Car Number CIGX892780	Inspection Date 05/29/2018 IntAl5 PM
Rail Car Inspection Type Rail Gondola 🗸	Owner Name
Inspection Type O Pre-Load O Post-Load O Pre-Unload O Post-U	Inload Capacity 110,0000 Toti
	Empty Weight 38,0000 TON
	Allowable Weight 143.0000 TON
	Inspection Location
	State-Country OK-US
	Asset Condition Fair
	Inspected By
Last Name: Beck First Name: Bradley I	Employee ID: 012306
Comments	\sim
Only check off items that are not OK	
	Inspection Items
Car Inspection	After Loading / Unloading
Stenciling - Legible? Not Peeling?	Blue Flag Removed
Double Shelf Coupler	Wheel Chocks Removed
Bands or Stabilizers	Derailed Removed
Check for Dents, Punctures, Gouges, Leakage	Placards Installed (4)
Wheels & Brakes	
Axles, Springs & other hardware	
Safety Appliances	
Placard holders (4)	
Hand Brake Operational	
Sill Steps and Grip Irons	
Running Boards	
Gratings Safe	
Check Defect Card Holder	
Unit Inspection Result	
R - Equipment requires maintenance or seasing	
S. Condition of equipment is catiefactory	
	Scan/Upload Image (Maximum file size allowed 10MB)
9	
L	
	Mechanic Signature



Inspector Signature:

843

RIA

Page 2 of 2



Appendix 3

68LG 1013

CHES Transfer Station JHA/JSB

Daily Job Briefing

Print Name		Signature
	-	
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CHLM Avard Transfer Station

Development and Operations Plan,

Section 8:

Preparedness and Prevention Procedures

March, 2018

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Design and Operation of Facility

Waste transfer processes at the CHLM Avard transfer station are designed with safety features for protection of human health, the environment, and the general public. The facility is designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Required Equipment

Internal Communications

The CHLM Avard transfer station is equipped with an internal communications system capable of providing emergency instruction to facility personnel. Internal communications can be accessed through a telephone system and a Public Address (PA) system. Telephones will be located so that employees will have access to a phone. An employee will be able to call any other telephone in the facility and can access the PA system for paging. The paging system will broadcast through a series of loudspeakers. Two way communication devices (two-way radios or mobile telephone) or paired work crews (i.e.; the buddy system) will ensure that every employee has immediate access to communication in the event of an emergency.

External Communications

External facility communications will be available through the local telephone company. Local and long distance telephone connections are available. Arrangements for emergency response have been made with appropriate outside agencies. (See Contingency Plan, Section 9. Emergency Equipment

Portable fire extinguishers, water for firefighting, spill control equipment, and decontamination equipment will be available at the facility. Descriptions, locations, and a list of

8-2

emergency equipment for the facility are provided in the Contingency Plan. Emergency equipment is inspected for availability and readiness according to the schedule specified in the Inspection Program.

Water for Fire Control

The facility has a supply of water available for firefighting. Water for fire protection is stored in a tank on-site or available from the rural water district water system. Water access points are present in several locations on-site.

Access to Communications System

Operations personnel involved in active transfer of hazardous waste will have immediate access to an emergency communication device, either directly or through visual or voice contact with another employee. If there is ever just one employee on the premises while the facility is operating, he will have immediate access to a device (such as a two-way radio or mobile telephone) capable of summoning external emergency assistance.

Testing and Maintenance of Equipment

Facility communications, fire protection equipment, spill control equipment, and decontamination equipment, where required, is tested and maintained as necessary to assure proper operation in time of emergency. An inspection program has been developed to facilitate this program.

Inspection Schedule

CHLM has developed an Inspection Program for the Avard transfer station to provide a systematic method of identifying potential problems, malfunctions, or deterioration which may cause or lead to a release of hazardous constituents to the environment or a threat to human health.

8-3

The facility inspection program, including inspection schedules, is maintained on site. (See Section 12 for further information.)

Required Aisle Space

When containers are present, aisles will be maintained to allow hand held and portable emergency response equipment to be moved. Adequate aisle space (2-4 feet) is maintained to allow unobstructed movement of personnel, fire protection equipment, or spill control equipment. Security

The CHLM Avard transfer station will be secured to prevent the unknowing entry and minimize the possibility for the unauthorized entry of persons or livestock onto the active portion of the facility to protect human health and the environment. (The active portion of the facility, hereinafter referred to in this section as "the facility," is as defined by 40 CFR 261.10.) This will be accomplished by provisions such as fencing, gates, and warning signs. Presence of facility personnel during operations will minimize or prevent incidents of trespassing and vandalism. In addition, employees are instructed to question and direct unauthorized visitors to the office should they try to enter the facility.

Arrangements with Local Authorities

As detailed in the Contingency Plan, the local authorities have been familiarized with the various attributes of the facility. The fire departments have been informed of the location of various pieces of firefighting equipment. The location of the various operations has also been indicated. The Waynoka Fire Department is the designated primary fire department.

The Oklahoma State Highway Patrol has been informed of the location of the facility and the locations at which to establish roadblocks on the access road. The local hospital and ambulance services have also been informed of the likely injuries expected at the facility. Their agreements

8-4

are documented in the Contingency Plan. The Contingency Plan also contains a list of available local contractors who can supply emergency equipment.



CHLM AVARD TRANSFER STATION

CONTINGENCY PLAN

Section 9:

February 1993

Last Revised: March, 2018

CONTINGENCY PLAN

Clean Harbors Lone Mountain. LLC Avard Transfer Station

37647 Ellis Road, (1/2 Mile East of Avard, Oklahoma)

Alva, OK 73717

Telephone (580) 697-3500

February 1993

Last Revised: March 2018

Important - In the event of an emergency that requires implementation of the Contingency Plan:

- If you are the first person to discover an incident, turn to Implementation on Page 15.
- 2) If you are an Emergency Response Coordinator, turn to Emergency Response Procedures on page 15.

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Form for Agreement with Fire Departments

Appendix A-4

FIGURE F-1 SITE LOCATION MAP





Figure F-2.

Letter Authorizing Use of Company Funds

To Whom It May Concern:

As Vice President of Environmental Compliance for Clean Harbors Lone Mountain, I hereby grant authority to commit all company resources (as deemed necessary) to implement the Contingency Plan, in the event of an occurrence which warrants implementation of said plan, to the duly designated Emergency Coordinator (primary and alternates). Should my position with the company change in any manner, this granted authority is not affected.

18

Date Signed

Matthew C. Sauvageau Vice President, Environmental Compliance

FIGURE F-3 FACILITY LAYOUT



LOCATION, SIZE, AND DESIGN OF FACILITY AND COMPONENTS ARE APPROXIMATE.

FIGURE F-4 TRANSFER STATION BUILDING



LOCATION, SIZE, AND DESIGN OF FACILITY AND COMPONENTS ARE APPROXIMATE.

CLEAN HARBORS AVARD TRANSFER FACILITY RURAL ROUTE 2, BOX 102AA ALVA, OKLAHOMA 73717 **REVISION: 3/1/2018**

FIGURE F-5 TRANSFER STATION BUILDING SLAB DETAILS



VIEW LOOKING SOUTH

LOCATION, SIZE, AND DESIGN OF FACILITY AND COMPONENTS ARE APPROXIMATE.

FIGURE F-6 EVACUATION ROUTE MAP



LOCATION, SIZE, AND DESIGN OF FACILITY AND COMPONENTS ARE APPROXIMATE.
FIGURE F-7 EMERGENCY EQUIPMENT LOCATIONS



LOCATION, SIZE, AND DESIGN OF FACILITY AND COMPONENTS ARE APPROXIMATE.

CLEAN HARBORS AVARD TRANSFER FACILITY RURAL ROUTE 2, BOX 102AA ALVA, OKLAHOMA 73717



SCOPE OF WORK

BNSF: NO WORK BY BNSF

R

CONTRACTOR: Contractor to supply, assemble, and install 6.811.09 T.F. 115# Rail Including:

(2) No. 11 RH HTTO 136# with RBM Frogs, Samson switch points and safe lock clips.

(6) 39' Buffer panels with Comp Bars (Buffer panels to be placed ahead and behind turnouts).

Curved and tangent track to be 7"x9'x8'x6" Grad Ties with end plates at 19.5" spacings.

Tangent track to be standard jointed track with new 6 hole angle bars and 7 3²"x12" relay plates.

Curved track to be CRW with new Pandrol plates and E-clips.

207' Concrete panel crossings

(8) Private Road grade crossing signs

Drainge Pipes: 55'-10'x6' Box Culvert 84'-4'x3' Box Culvert 50'-30" CMP 790'-12" CMP

6,811.09' T.F. of subgrade and subballast preparation.

FENCE LINE

90%

or Use in Agreement with: CLEAN HARBOR ENVIRONMENTAL SERVICES OCATION & DESCRIPTION: Milepost 601.664, Avard Subdivision, Avard, Woods County, OK. Trackage to Serve: C.H.S.E.



SCOPE OF WORK

BNSF: NO WORK BY BNSF

CONTRACTOR: Contractor to supply, assemble, and install 6,811.09 T.F. 115# Rail Including:

(2) No. 11 RH HTTO 136# with RBM Frogs, Samson switch points and safe lock clips.

(6) 39' Buffer panels with Comp Bars (Buffer panels to be placed ahead and behind turnouts).

Curved and tangent track to be 7"x9'x8'x6" Grad Ties with end plates at 19.5" spacings.

Tangent track to be standard jointed track with new 6 hole angle bars and 7 $\frac{3}{4}$ "x12" relay plates.

Curved track to be CRW with new Pandrol plates and E-clips.

207' Concrete panel crossings

(8) Private Road grade crossing signs

<u>Drainge Pipes:</u> 55'-10'x6' Box Culvert 84'-4'x3' Box Culvert 50'-30" CMP 790'-12" CMP

6,811.09' T.F. of subgrade and subballast preparation.

90%

 For Use in Agreement with:

 CLEAN HARBOR ENVIRONMENTAL SERVICES

 LOCATION & DESCRIPTION:

 Milepost 601.664, Avard Subdivision,

 Avard, Woods County, OK.

 Trackage to Serve: C.H.S.E.





PT 42+05.20 30" CMP 50' TRACK A STA 36+28.00 T/R TO IE = 6.53' 00 003 -13' ACCESS ROAD SHEET $\overline{}$ MATCHLINE E0220 RD.





LOCATION & DESCRIPTION: Milepost 601.664, Avard Subdivision, Avard, Woods County, OK. Trackage to Serve: C.H.S.E.









TOP RAIL PROFILE TRACK A STA. 59+50 ~ E.O.T 68+11.09



TRACK A



TYPICAL SECTION TRACK A STA. 0+00.00 TO END OF TRACK A



90%

Table T-1 Emergency Coordinators List

Facility Address and Phone Number: 37647 Ellis Road Alva, Oklahoma 73717 (580) 435-2244

PRIMARY

Availability At Facility

Brad BeckMonday - FridayFacility Foreman8:00 a.m. - 4:30 p.m.1911 Cecil Street8:00 a.m. - 4:30 p.m.Waynoka, OK 73860768-9609

ALTERNATES

 Craig Bruehl
 Monday - Friday

 Operations Manager
 8:00 a.m. - 4:30 p.m.

 PO Box 934
 8:00 a.m. - 4:30 p.m.

 Woodward, OK 73802
 (580) 254-0184

 Mobile Phone (580) 768-9642
 768-9642

Chris Mullins Operations Supervisor 3223 Durum Woodward, OK 73801 (580) 254-5222 Mobile Phone (580) 768-9577

Paul ShawMonday - FridayFacility Foreman8:00 a.m. - 4:30 p.m.2703 Santa FeWoodward, OK 73801(339) 933-1266

Christopher CastilloMonday - FridayFacility Operations8:00 a.m. - 4:30 p.m.Manager 2171 Santa Fe St.8:00 a.m. - 4:30 p.m.Waynoka, OK 73860Mobile (339) 236-4290

NOTE: Coordinators are on a rotating schedule after business hours.

Table T-2 **Telephone List for Emergency Notification**

Waynoka, Oklahoma Fire Dept.* (580) 824-2061 Police Dept. (580) 824-2061 Ambulance (580) 824-2061

Alva, Oklahoma

 Aiva, Oktanoma

 Fire Dept. (580) 327-3131

 Police Dept. (580) 327-2121

 Ambulance (580) 327-2300

 Hospital (580) 327-2800 (Share Memorial Hospital)

WOODS COUNTY SHERIFF'S DEF	PARTMENT	(580) 327-3434		
OKLAHOMA HIGHWAY PATROL	OKLAHOMA HIGHWAY PATROL*			
DEPARTMENT OF ENVIRONMEN LAND PROTECTION DIVISION	ITAL QUALITY (DEQ)	(405) 702-5100		
COMPLAINTS AND LOCAL SERV	TCES (DEQ)	(405) 702-6222 (800) 522-0206		
NATIONAL RESPONSE CENTER		(800) 424-8802		
Avard transfer station office		(580) 435-2244		
Lone Mountain Facility	office	(580) 697-3500		
Brad Beck Facility Foreman	mobile	(580) 768-9609		
Craig Bruehl Operations Manager	home mobile	(580) 254-0184 (580) 768-9642		
Chris Mullins Operations Supervisor	home mobile	(580) 254-5222 (580) 768-9577		
Paul Shaw Facility Foreman	mobile	(339) 933-1266		
Christopher Castillo Facility Operations	mobile	(339) 236-4210		

* The Waynoka Fire Department will coordinate other fire departments, if applicable. The Oklahoma Highway Patrol will coordinate other law enforcement agencies, if applicable.

Table T-3	General Emergency Equipment List By Facility Area
Office	Fire extinguisher, public address, telephone, first aid, two-way radio or mobile telephone, cartridge respirators, and safety equipment.
Transfer Building	Fire extinguishers, public address, telephone, two-way radio or mobile telephone, fire water with pump capability, safety shower/eye wash.
Decontamination Trailer	Fire extinguishers, first aid, SCBA, shower, cartridge respirators, and safety equipment.
Emergency Containment Area	Fire extinguisher, and water access.
General Facility	Absorbent material, containers (e.g., overpack drums), shovels, transfer equipment, and heavy equipment.
NOTE:	During maintenance, replacement or use activity, emergency equipment may not be in location listed.

Table T-4General List of Equipment/ServicesAvailable in Northwest Oklahoma

1.	Heavy Equipment -	Dozers, Backhoes, Scrapers, Trucks, Road Graders, Cranes, Front End Loaders.
2.	Light Equipment	Skid Steer Loaders, Forklifts, Pickup Truck, Ditchers/Trenchers.
3.	Replacement Parts And Products	Valves, Fittings, Hoses, Metal Pipe, Plastic Pipe, Plastic Pit Liners, Tanks, Pumps, Chemicals, Pozzolans.
4.	Services	Welding, Electrical, Equipment Operation, Dirt Work, Clerical, Medical & Emergency, Consultant
	NOTE	The Emergency Response Coordinators are familiar with area vendors and can also rely on input from company employees and facilities (i.e., CHLM Lone Mountain) in locating the above items.

Fire Department	Equipment Available	Personnel Usually <u>Available</u>
Alva	1 Pumper Truck 1 Tanker Truck	4
Waynoka	1 Pumper Truck 1 Pumper Truck (on order)	6

Table T-5Capabilities of the Local Fire Departments

* The Waynoka Fire Department will coordinate the other fire departments. However, only personnel who have received training per 29 CFR 1910.120(q) will be allowed to assist in an on-site emergency where exposure to hazardous substances is possible.

NOTE:	Equipment and personnel availability are
	dependent upon the annual budget
	of the respective community.

References

- 1. DEQ Rules for Hazardous Waste Management, OAC 252:205-15 Transfer Stations.
- 2. Title 40 Code of Federal Regulations 40 CFR Part 264, Subparts C and D
- 3. Title 40 Code of Federal Regulations 40 CFR Part 302.

Introduction

Physical Location of Facility

From downtown Waynoka, travel seven and three quarter (7.75) miles north on Highway 14, turn right at sign indicating Avard, travel five and one half (5.5) miles east; or from Alva, travel seven miles west on Highway 64, turn left at sign indicating Avard, travel seven (7) miles south (through Avard), turn left at the end of the pavement, continue one half (0.5) mile east to the facility (located on the north side of the road). The facility mailing address is: 37647 Ellis Road, Alva, OK, 73717 (Telephone: 405/435-2244; Telefax: 405/435-2245)

General Information

The CHLM Avard transfer station is an existing "transfer station" as defined by DEQ rule252:205-15-2(a)(1). The facility consists of an office, transfer building, decontamination trailer, emergency containment area, and staging area. Future units could include a container management area, and tank systems. The facility can handle a wide range of wastes during the course of transportation. Examples of wastes which could be managed on site include acids, caustics, solvents, oils, metal-bearing sludges, contaminated soils, debris, multi-source leachate, etc.

Plan Purpose

The purpose of this Contingency Plan is to minimize hazards to human health and the environment from fires, explosion or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, ground water or surface water.

Emergency Coordinators

There will be a minimum of one employee at the facility or on call at all times who will assume responsibility for coordination of all emergency response measures. The Emergency Coordinator (EC) will utilize all available company and government assets necessary to protect human health and the environment from the threat of fire, explosion or release of hazardous waste or hazardous waste constituents to the environment as well as minimize the spread of contamination and the destruction of property.

The EC or Alternate EC will have complete authority to commit all available resources necessary to implement the Contingency Plan in the event of an emergency. All government authorities (e.g.; fire departments) will coordinate their activities through the EC. A list of the ECs is given in Table T-1.

The Avard Facility Lead Plant Operator is the designated Primary Emergency Coordinator for the Avard transfer station. The Lead Plant Operator is responsible for planning and operation of station activities. He assists in the review of the Contingency Plan and is thoroughly familiar with the facility, facility operations and activities, and the location of records.

The Alternate ECs are thoroughly familiar with the facility, facility operations and activities, the location of records, and the Contingency Plan. The list of Alternate ECs will be comprised of responsible individuals designated by CHLM management.

The list of ECs is contained in all copies of Contingency Plan. In addition, this list is posted at numerous locations within the facility. Authorization for the Primary and Alternate ECs to implement the Contingency Plan and commit necessary resources during an emergency is presented in Figure F-2.

Implementation

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

This plan serves as a guide rather than an unyielding set of procedures. Options typically considered by the EC when responding to an incident are addressed in the Emergency Response Procedures outlined below.

The CHLM employee discovering the incident (e.g. explosion, fire, release of contaminants or personal injury) should, if possible and absolutely safe to do so:

- 1. Evacuate injured personnel
- 2. Stop the spread of contamination (e.g., turn off a valve on a tank)
- 3. Begin primary containment of liquids (e.g., dikes)
- 4. Evacuate unnecessary personnel from the immediate area of the incident
- 5. Notify the EC (or alternate) in the order listed in Table T-l.
- NOTE: The employee should not delay in notifying the Emergency Coordinator, regardless of the situation.

Employee Response Procedures

Identification of Hazardous Materials

Whenever there is a release, fire, or explosion, the EC must determine the character, exact source, amount and areal extent of any released materials (i.e.; hazardous waste or constituents). He may do this by observation (e.g.; placards, labels), review of station records, or, if necessary, by chemical analysis.

Assessment

The EC must 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 release, fire, or explosion. The EC will consider:

- 1. The effect of any toxic, irritating, or asphyxiating gases that may be generated.
- 2. The effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions.
- 3. The possibility of a heat induced explosion.
- 4. The possibility of fire spreading to other areas.
- 5. The risk facility personnel might be exposed to by attempting to control an emergency situation.

In assessing potential hazards, the EC may take account of truck placards, manifests, operating records, weather conditions, and container labels. If the EC determines that the station has had a release, fire, or explosion which could threaten human health or the environment outside the facility, he will immediately notify local authorities, assist them in determining if evacuation of the local area is necessary and, subsequently, notify either the government official designated as the on-scene coordinator for that geographical area or the National Response Center at (800) 424-8802.

The caller to the appropriate authorities must provide the following details:

- 1. Name of caller;
- 2. Name of facility and telephone number CHLM Avard transfer station (405) 435-2244;
- 3. Location of facility From downtown Waynoka, travel seven and three quarter (7.75) miles north on Highway 14, turn right at sign indicating Avard, travel five and one half (5.5) miles east; or from Alva, travel seven miles west on Highway 64, turn left at sign indicating Avard, travel seven (7) miles south (through Avard), turn left at the end of the pavement, continue one half (0.5) mile east to the facility (located on the north side of the road);
- 4. Time and type of incident;
- 5. Name and quantity of material(s) involved (if known);
- 6. Extent of injuries (if known), and;
- 7. Possible hazards to health and environment outside the facility.

Notification

After the EC has determined that there is an actual or imminent emergency situation, he must:

1. Activate internal facility alarms and/or communication systems (loud speakers, telephone, radios) as necessary to notify facility personnel.

In the event that evacuation of the facility is necessary, the EC will have an emergency message announced over the loudspeaker, similar to: 'DANGER - EVACUATION REQUIRED'*. Evacuation procedures are further detailed below. Emergency operations will typically be coordinated from the main office. In the event that this office is not available as a coordination center, another command post will be chosen by the EC. Communication via either citizen band radios, business band radios, facility telephone, or the facility public address system may be utilized during an emergency.

- 2. Notify appropriate state or local authorities and agencies if their help is needed. The phone numbers for these agencies are listed in Table T-2.
- NOTE: When notifying authorities, the caller will provide the following details as requested by the authority:
 - a) Name of caller;

b) Name of facility and telephone number - CHLM Avard transfer station (405) 435-2244;

c) Location of facility - From downtown Waynoka, travel seven and three quarter (7.75) miles north on Highway 14, turn right at sign indicating Avard, travel five and one half (5.5) miles east; or from Alva, travel seven miles west on Highway 64, turn left at sign indicating Avard, travel seven (7) miles south (through Avard), turn left at the end of the pavement, continue one half (0.5) mile east to the facility (located on the north side of the road);

- d) Time and type of incident;
- e) Name and quantity of material (s) involved to the extent known;
- f) Extent of injuries, and;
- g) Possible hazards to health and environment outside the facility.

Control Procedures

Upon determination that an actual or imminent emergency condition exists (i.e.; threat to human health or the environment), the EC will:

- 1. Coordinate the evacuation of personnel from the area of immediate danger and coordinate first aid for injured personnel, if necessary.
- 2. Commence remedial action that will reduce the impact of the incident and result in abatement of any threat to human health or the environment.
- NOTE: Depending on the type of incident, different responses may be warranted. Different types of possible incidents are listed below:
 - 1. Injuries
 - 2. Fires and explosions at:
 - a) the Transfer Building;
 - b) Vehicle (truck, car, etc.) in close proximity to waste management areas;
 - 3. Release of toxic, flammable or asphyxiant gases;
 - 4. Rupture of, or spill from, container or tank.

A check list of possible options for responding to any of the previous incidents follows.

The EC may also consider options that facility personnel suggest.

<u>G-4.(e)</u> Options for Responding to Incidents

Should Option Be Implemented?

Yes No

	1. Are there any injured personnel? If not, skip to Option 11
	2. Evacuate injured personnel from immediate danger.
	3. Use SCBA or cascade breathing system to evacuate injured personnel from danger if necessary. (Table T-3 indicates emergency equipment location).
	4. Start CPR or artificial respiration.
	5. Wash eyes, skin, etc. of injured person with water for 15 minutes.
	6. Using first aid kit, treat injured personnel (See Table T-3, for the location of equipment).
	7. Evacuate immediate area around injured person(s).
	8. Establish emergency operations center.
	9. Request that ambulance(s) be sent to the facility. (See Table T-2).
	Time :
	Ambulance Service(s) Contacted:
	Contact's Name:
	10. Dispatch facility personnel to meet and direct incoming emergency vehicles.
	11.Contact the Lead Plant Operator if he is not presently the Emergency Coordinator. (See Table T-2, phone list).
	If outside agencies or contractors have been contacted, the Facility Manager should also be contacted. (See Table T-l).
	12. Fight fire with fire extinguisher.

	13. Prohibit fighting fire with water if solvents oil, etc. are involved (or suspected) or if undesirable reactions may result (contaminated run-off which cannot be contained).
	14. Fight fire with water tank system. Two people should be assigned to task (one to reel out hose, the other to operate the water valve)
	15. Evacuate immediate area around the fire or facility. (See Evacuation Procedure below.)
	16. If the facility is evacuated, consider moving the emergency operations center to a vehicle parked on a local county road. Establish emergency communications using a citizen band radio tuned to Channel 14 and/or a business band radio.
	17. Contact appropriate state and local agencies. The telephone list is posted next to main outgoing phones in the facility.
	a) If the Emergency Coordinator determines that the incident could threaten human health or the environment outside the facility, he must:
	1) Notify the highway patrol and/or Woods County Sheriff Department if local areas need to be evacuated.
	2) Notify the Oklahoma Department of Environmental Quality.
	3) Notify the National Response Center (1-800-424-8802) and provide information listed on page 17.
	b) Advise highway patrol and/or sheriff's department to establish roadblocks on county road east or west of the site, as necessary.
	c) Agencies Contacted (fill in blanks):
	1) Time:
	2) Agency Contacted:
	3) Contact(s) Name:

	 d) The Waynoka Fire Department will coordinate all other fire departments. The highway patrol will coordinate all law enforcement agencies.
	18. Dispatch facility personnel to meet and direct incoming emergency vehicles.
	19. Commence remedial actions to stop flow or release of materials (e.g.; pump material to tanks, build containment dikes).

Additional options for the rupture of, or spill from, a container:

	20. Immediately cease the flow or stop the addition of waste into the container.
	21. Immediately stop the release of material and control surface migration (e.g.; pump material to containers, build containment dikes)
	22. Immediately transfer contents of container to another container.
	23. Remove all waste from secondary containment systems in as timely a manner as possible in order to prevent harm to human health and the environment.
	24. Visually inspect the area for release to soil or surface water and remove all contaminated material for disposal.

Options to Prevent Recurrence or Spread of Fire/Explosions/Releases

Should Option Be Implemented?

Yes No

	1. Protect other operations and vehicles from the incident. These measures must include, where applicable, stopping processes and operations, collecting and containing released materials, removing or isolating containers or moving vehicles (e.g.; trucks, cars and tractors).
	2. Monitor for leaks, pressure build-up, gas generation or ruptures in other equipment.
	3. Spray water on containers to keep them cool to minimize the potential for explosions.
	4. Remove any combustible materials from area.
	5. Disconnect electrical power to affected areas.
	6. Circumvent waste inflows (if applicable).
	7. Cease all associated operations (if possible).
	8. Prevent trucks from entering the facility with additional waste.
	9. Halt all facility operations.

Options for Storage and Treatment of Released Materials

Should Option Be Implemented?

Yes No

	 Provide for the treatment, storage or disposal of recovered contaminated soil, surface water or any other material that results release, fire or explosion at the facility. The material resulting from leaks or spills should be placed in drums, ta or containers 	waste, from a ankers,
	of containers.	
	2. Utilize on-site equipment (if possible) for remedial actions. (See Tak for equipment list.)	o;e T-3
	3. Utilize outside contractors for remedial actions. (See Table T-4 for contractor equipment/services list.)	outside
	 Provide adequate safety equipment and protective clothing for per involved in the remedial actions. (See Table T-3, for equipment list.) 	rsonnel)
	5. If a spill from a container occurs, store or dispose of material in acco with all applicable regulations and policies.	ordance

Options for Incompatible Waste

Should Option Be Implemented?

Yes No

	1. In affected areas of the facility, isolate (if possible) materials that may be incompatible with the released materials. This will be accomplished by:
	a) Preventing the resumption of operations in areas where incompatible material has been released by the incident. Upon removal of the material, operations may resume.
	b) Materials will not be moved to areas where they would be incompatible with existing operations.

The EC will arrange for the decontamination or replacement of all emergency equipment before operations can resume in the affected areas of the facility.

Within fifteen (15) days after the Contingency Plan has been implemented, the EC (or designee) or CHLM must complete a "Contingency Plan Implementation Report" and submit it to the DEQ. Copies will be filed in the operating record of the facility.

Emergency Equipment

Emergency equipment includes, spill control equipment, fire control equipment, communication systems, safety equipment, and decontamination equipment.

Following is a list of emergency equipment (including the location, description, and brief outline of the capabilities) available on site (during maintenance, replacement, or use activity, emergency equipment may not be in location listed). The list is subject to modification.

- 1. <u>Loudspeakers (Public Address) and Telephones:</u> The loudspeakers and telephones allow information to be given from the office to personnel throughout the facility. Outgoing calls can be made from most phones on site. Incoming calls can be transferred to any of the telephones.
- 2. <u>Two-way Radios or mobile telephones:</u> Mobile two-way radios or mobile telephones are available for communication throughout the facility.
- 3. <u>Fire Water Pump & Hose:</u> For the purpose of firefighting, water is stored in a tank located near the transfer building. A pump system is located in the area along with hoses. A device will regulate water level in the tank from the rural water line. The water system can also be used for equipment decontamination.
- 4. <u>Safety Shower and Eye Wash Station:</u> The shower and eye wash station is operated by hand and/or foot controls. Water flows through the nozzles to decontaminate personnel and equipment. The shower located in the decontamination trailer can also be used in an emergency.
- 5. <u>SCBA:</u> These are pressurized cylinders of breathing air which are mounted on a back pack. The air pressure is reduced through a regulator and then flows to a full face mask. The air supply can be regulated to positive air pressure that provides constant flow; or to on-demand which provides air flow only as the individual inhales. Air cylinders will supply air for approximately thirty (30) minutes.
- 6. <u>First Aid Stations:</u> The first aid boxes are equipped with supplies to handle minor injuries or illnesses.

- 7. <u>Cartridge Respirators and Safety Equipment:</u> The cartridge respirator consists of a full or half face mask with filter cartridges. Various cartridges are used depending on the contaminants of concern. (Specific employees have a respirator). Other safety equipment (e.g.; gloves, Tyvek, boots, face shield, etc.) is also available for personal protection against most physical and chemical hazards.
- 8. Dry Chemical Fire Extinguishers: The following is a general list of the type and size of fire extinguishers which are usually located at the facility:

Туре		(lbs.)
		Size
Dry Chemical	ABC Manual	5
Dry Chemical	ABC Manual	20
Dry Chemical	ABC Manual	150

Coordination Agreements

Arrangements with Local Officials

The Contingency Plan has been submitted to local authorities who may be involved with Contingency Plan implementation (see Appendix A - Agreements with Local and State Authorities). CHLM will conduct orientation tours for all local and state authorities (if they so desire) who should be familiar with the facility operations. Local authorities (e.g.; fire departments, hospitals, police, ambulance service) have been contacted with regards to the CHLM Avard transfer station facility contingency plan. Agencies provided with a copy of this contingency plan are identified in Appendix A-1 - List of Coordinating Agencies. Forms for agreements with local agencies are presented in Appendix A-2 for Medical Assistance Agreement, Appendix A-3 for Law Enforcement Agency Agreement, and Appendix A-4 for Agreement with Fire Departments.

The local hospital and ambulance services have been informed of the most likely types of injuries and the areas in which these injuries may occur. "Medivac" units from Oklahoma City have also been given this information.

Chemical burns, smoke or fume inhalation, heat burns, contusions, fractures, back injuries, and eye injuries are the most probable injuries. The potential locations of incidents include the following:

- 1. Transfer Building
- 2. Emergency Containment Area
- 3. Staging Area

The Oklahoma State Highway Patrol and the Woods County Sheriff's Department have been consulted during development of the proper procedures for isolating the facility from outside traffic and proper evacuation of both facility personnel and surrounding local residents, if it is required (See Figure F-4, evacuation routes).

If no evacuation is necessary, the agencies may direct traffic along the county road, which parallels the facility, to ensure that it does not become congested. They may also direct traffic that is entering the facility in response to the emergency. If a major incident occurs, law enforcement officials may block the county road that parallels the facility and not permit unauthorized travel. The highway patrol is the primary law enforcement authority and will coordinate the various police and sheriff departments.

In case of minor fires, facility personnel will usually respond to extinguish or contain the fire. If a major fire occurs, local fire departments will be called. The local fire departments will be responsible for the prevention and spread of the fire outside the facility. If more than one (1) fire department arrives on site, the fire department from Waynoka, Oklahoma will be the primary fire authority.

The capabilities of the different fire departments and their ability to respond in an emergency is given in Table T-5. The hospitals in the area can handle routine injuries (e.g.; broken bones, cuts, minor burns). "Medivac" units from Oklahoma City will be used, if necessary.

Incidents involving rail activities while loading, unloading or the movement of railcars will be responded to by either the facility personnel or the railroad authority. Once a railcar is offered for shipment and moved off-site, the rail provider has responsibility to coordinate any incidents involving the car or materials (i.e., spills). Any railcar still in the control of the facility personnel will coordinate any incident involving the car or materials.

Facility Evacuation Procedures

If evacuation of the facility is necessary, the following procedure should be used:

- 1. The Emergency Coordinator may instruct another person to coordinate the evacuation of the facility.
- 2. Using the loudspeaker system, the Emergency Coordinator or his designee should announce a phrase similar to: "DANGER EVACUATION REQUIRED" several times. The same announcement will be made over the two-way radio system. The location of the incident should be announced to help personnel avoid the affected area during evacuation. The Emergency Coordinator will provide any special evacuation procedures deemed necessary. Employees may be instructed to bring self-contained breathing apparatus or other emergency equipment from their areas to the gathering point.
- 3. Facility personnel must evacuate the facility and congregate at the gathering point on the county road south of the facility (see Figure F-6); gathering point is located to the east or west (depending on wind direction). The planned evacuation route is through the south gate, then east or west as appropriate. All personnel should evacuate using a vehicle (e.g.; car or truck) or on foot.
 - NOTE: In the event that the planned evacuation gates or gathering points are not safely accessible to the employee, a safe alternative should be used, remembering to stay upwind.
- 4. The Emergency Coordinator or a designee coordinating the evacuation must conduct a head count of all assembled personnel to determine if any are missing. Using the communication systems, the Emergency Coordinator must attempt to notify any missing person of the prompt need to evacuate. If the missing person(s) is (are) not located, or if the intercom is inoperable, the Emergency Coordinator will assume responsibility for locating missing persons.
- 5. Facility personnel must not return to the facility until permitted by the Emergency Coordinator.
- 6. The Emergency Coordinator should assess the situation and develop additional plans as necessary.

CHLM Contingency Plan Implementation Report (CPI Report)

The provisions of this Contingency Plan must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Minor incidents that are controlled by the facility personnel (e.g.; small spills) do not necessarily require formal reporting to the authorities. However, all spills of a reportable quantity (RQ) must be reported as per the regulations (40 CFR Part 302) to the National Response Center and the DEQ, even if they do not result in implementation of the Contingency Plan. Whenever the Contingency Plan is implemented, the DEQ will be verbally notified as soon as possible.

Should formal Contingency Plan implementation reporting be required, the Emergency Coordinator will complete the CPI Report for management's review. The report must be submitted to the Oklahoma Department of Environmental Quality within 15 days after the incident. A copy of the information to be contained in the CPI Report follows.

EXAMPLE

CHLM Avard transfer station Rural Route 2, Box 102AA Alva, OK 73717 (405) 435-2244

Contingency Plan Implementation Report

Date of Incident: _____ Time of Incident:

Emergency Coordinator:

Type of Incident (e.g.; fire, spill, explosion, etc.)

Any injuries? Yes/No Any Deaths? Yes/No If yes to either question, describe:

List the name and quantities of materials involved:

Describe the estimated quantity and disposition of recovered material that resulted from the incident:

Briefly describe the incident. (Include a sketch for clarification, if necessary). Include an assessment of-actual or potential hazards to human health or the environment.
Amendments to the Contingency Plan

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

- 1. The plan fails in an emergency;
- 2. The station changes (in its design, construction, operation, maintenance or other circumstances) in a way that increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency;
- 3. The list of Emergency Coordinators changes; or
- 4. The list of emergency equipment changes.

APPENDIX A

AGREEMENTS WITH LOCAL AND STATE AUTHORITIES

Appendix A-1

List of Coordinating Agencies

<u>copy</u>	Organization	<u>Contact</u>	Address
1)	Oklahoma Department of Environ mental Quality	Chief of Hazardous Waste Management Service	OKC, OK
2) 3) 4) 4)	Fire Department* Hospital* Ambulance Service* Police Department*	Chief Hospital Admin. Ambulance Dir. Chief	Alva, OK
6) 7) 8)	Fire Department* Police Department* Ambulance Service*	Chief Chief Ambulance Dir.	Waynoka, OK
9)	Oklahoma Highway Patrol*	Administrator	Enid, OK
10)	Woods County Sheriff's Department*	Sheriff	Alva, OK
11)	Oklahoma Medical Center* Medi-Flight	Director	OKC, OK

* Signed copies of the agreements between CHLM and the designated agency have been returned by these agencies.

Appendix A-2 Form for Medical Assistance Agreement

Agreement Between	and CHLM Avard transfer station.
Contingency Plan	19

1. <u>Location</u>

The site is located approximately twelve and one half (12.5) miles northeast of Waynoka and fourteen (14) miles southwest of Alva (See Figure F-l in the Contingency Plan).

2. <u>Problems</u>

The CHLM Avard transfer station is an existing transfer station as defined by DEQ rule 310:270-8-1. The facility consists of an office, transfer building, decontamination trailer, emergency containment area, and staging area. Future units could include a container management area, and tank systems. The facility handles a wide range of wastes during the course of transportation. Examples of wastes which could be managed on site include acids, caustics, solvents, oils, metal-bearing sludges, contaminated soil, debris, multi-source leachate, etc. Potential incidents could include:

- a) Injuries to personnel upon coming in contact with certain wastes or from other standard industrial activities.
- b) Explosions and fires.
- c) The release of toxic, flammable or asphyxiating gases.
- d) The rupture of, or spill from, a container or tank.

3. <u>Objective</u>

The medical assistance service will stabilize injured personnel and transport them to local hospitals or appropriate medical facilities as directed by the CHLM Emergency Coordinator.

4. <u>Coordination of Response</u>

- a) The medical assistance service will coordinate all activities through the CHLM Emergency Coordinator.
- b) The primary location for emergency operations will be the site office (405/435-2244). Should the office be undesirable, the Emergency Coordinator at the site will select an alternate location.

FOR CHLM AVARD TRANSFER STATION

Name (Print)

Title

Signature

Date:_____

. .

Name (Print)

FOR EMERGENCY

MEDICAL SERVICE AGENCY

Signature

Title

Date:_____

Appendix A-3 Form for Law Enforcement Agency Agreement

Agreement Between	and CHLM Avard transfer station.
Contingency Plan	19

1. <u>Location</u>

The site is located approximately twelve and one half (12.5) miles northeast of Waynoka and fourteen (14) miles southwest of Alva (See Figure F-l in the Contingency Plan).

2. <u>Problems</u>

The CHLM Avard transfer station is an existing transfer station as defined by DEQ rule 310:270-8-1. The facility consists of an office, transfer building, decontamination trailer, emergency containment area, and staging area. Future units could include a container management area, and tank systems. The facility handles a wide range of wastes during the course of transportation. Examples of wastes which could be managed on site include acids, caustics, solvents, oils, metal-bearing sludges, contaminated soil, debris, multi-source leachate, etc. Potential incidents could include:

- a) Injuries to personnel upon coming in contact with certain wastes or from other standard industrial activities.
- b) Explosions and fires.
- c) The release of toxic, flammable or asphyxiating gases.
- d) The rupture of, or spill from, a container or tank.

3. <u>Objective</u>

The police department, sheriff's department and/or highway patrol will strive to maintain normal traffic flow around the facility and keep on-lookers at a safe distance from the facility. They will also be prepared to evacuate off-site residents and to establish road blocks, if necessary.

4. <u>Coordination of Response</u>

- a) The law enforcement agency will coordinate all on-site activities through the CHLM Emergency Coordinator.
- b) In the event that representatives of several police departments, sheriff's offices and highway patrol are present, the highway patrol will coordinate these agencies.
- c) The primary location for emergency operations will be the site office (405/435-2244). Should the office be undesirable, the Emergency Coordinator at the site will select an alternate location.

FOR CHLM AVARD TRANSFER STATION FOR LAW ENFORCEMENT AGENCY

Name (Print)

Title

Signature

Date:_____

Date:_____

Name (Print)

Signature

Title

Appendix A-4 Form for Agreement with Fire Departments

Agreement Between	 _ and CHLM Avard transfer station.
Contingency Plan	 19

1. <u>Location</u>

The site is located approximately twelve and one half (12.5) miles northeast of Waynoka and fourteen (14) miles southwest of Alva (See Figure F-l in the Contingency Plan).

2. <u>Problems</u>

The CHLM Avard transfer station is an existing transfer station as defined by DEQ rule 310:270-8-1. The facility consists of an office, transfer building, decontamination trailer, emergency containment area, and staging area. Future units could include a container management area, and tank systems. The facility handles a wide range of wastes during the course of transportation. Examples of wastes which could be managed on site include acids, caustics, solvents, oils, metal-bearing sludges, contaminated soil, debris, multi-source leachate, etc. Potential incidents could include:

- a) Injuries to personnel upon coming in contact with certain wastes or from other standard industrial activities.
- b) Explosions and fires.
- c) The release of toxic, flammable or asphyxiating gases.
- d) The rupture of, or spill from, a container or tank.

3. <u>Objective</u>

The fire department will strive to protect life and property and minimize the spread of contamination resulting primarily from fire and explosions but also spills, if necessary. They should be prepared to rescue trapped employees.

- 4. <u>Coordination of Response</u>
 - a) The fire department will coordinate all on-site activities through the CHLM Emergency Coordinator.
 - b) If several fire departments are present at the site, the Waynoka Fire Department personnel will coordinate the other fire departments.
 - c) The primary location for emergency operations will be the site office (405/435-2244) Should the office be undesirable, the Emergency Coordinator at the site will select an alternate location.
- 5. Location of On-Site Fire Fighting Equipment

Table T-3 in the Contingency Plan identifies locations of on-site firefighting equipment. Figure F-3 in the plan is a map of the facility.

FOR CHLM AVARD TRANSFER STATION

Name (Print)

Title

Signature

Date:_____

r (unite (1 mit)

Signature

Title

Date:_____

Name (Print)

FOR FIRE DEPARTMENT



CHLM Avard Transfer Station

Development and Operations Plan,

Section 10:

Personnel Training Program

March 2018

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Appendix I

Current Modules

Group Training Record

1.00 Overview of RCRA Training Program

It has always been paramount to the philosophy of . Clean Harbors Lone Mountain, LLC (CHLM) to provide the safest possible work environment for its employees. The RCRA training program provides facility personnel with the knowledge necessary to understand the processes and materials with which they are working, safety and health hazards, and practices for preventing (and the procedures for responding effectively to) emergency situations. In addition, the program provides the knowledge for using, inspecting, repairing, and replacing facility emergency equipment.

Initial training of employees is completed within six months of their start-work date. Each employee participates in an annual review of his or her initial training. Continuous instruction in safety is provided through safety meetings and drills. The goal is to have personnel trained to perform their specific job functions in a safe and compliant manner and maintain the facility in a constant state of preparedness.

1.01 RCRA PERSONNEL TRAINING REQUIREMENTS

Facility personnel must successfully complete a program of classroom instruction or onthe-job training that teaches them to perform their duties in a way that ensures the facility's compliance with regulations. Facility personnel must successfully complete the program within six months of the date of their employment or reassignment, whichever is later. The regulations specify a requirement that the program be designed to ensure that facility personnel are able to respond effectively to emergencies, must successfully complete a program of classroom instruction or on-the-job training, and must be trained to perform their duties in a way that ensures the facility's compliance with the requirement of 40 CFR Part 264. The regulations require facility personnel to be trained, and for the purpose of this plan, the definition of "facility personnel" is discussed below.

1.02 "FACILITY PERSONNEL" DEFINED

The regulations regarding facility personnel training require that employees responsible for managing hazardous waste be trained to the degree necessary that they can manage hazardous waste in compliance with the facility's permit (if applicable) and referenced regulations. For the purpose of this training program, the term "facility personnel" applies to those employees who work on-site for the purpose of managing (e.g. waste sampling, unloading, manifesting, etc.) hazardous waste.

"Facility personnel" are employees of CHLM (e.g., Lone Mountain Facility, Transportation, Grassy Mountain Facility, etc.) and/or contractors to CHLM who have completed the training requirements under this plan.

1.03 TRAINING RECORDS

Training records are maintained for each employee meeting the definition of facility personnel. Each record includes the job title of the employee, a description detailing the requisite skill, education, other qualifications, and duties related to that job title, and the amount of both introductory and continuing training that will be given to that employee. Also included in the file are records that document the training has been completed or job experience is satisfactory.

When personnel miss a refresher course (e.g. due to illness, vacation), they may review that topic with their supervisor, the Training Coordinator, or other qualified individuals. Such reviews are documented in the individual personnel training files.

Training records on current personnel will be kept until closure of the facility. Training records on former employees will be kept for at least three years from the date the employee last

10-3

worked at the facility except that, personnel training records may accompany personnel transferred within the company.

The master training records for personnel on-site may be kept at either the CHLM, Lone Mountain Facility or the Avard transfer facility.

<u>1.04</u> OFF-SITE TRAINING

Training is available apart from the facility which can serve to fulfill the training required here-in. In some areas, college credits or degrees can serve to exempt a person from further training in a certain area. For example, the Technical Manager and Lab Manager will normally have degrees in engineering, chemistry, or other science-related fields. These personnel would not be well served by having to attend a course in "Chemical Terminology, Toxicology, and Handling." In fact, these personnel may serve as the on-site technical expert in that area. In those cases where a person has expertise in an area, formal education or job experience may be documented and serve as total fulfillment of that particular training need.

In some years, a person may attend an off-site seminar or training course which contains equivalent information contained in one or more of the on-site training sessions. This training may be documented by the trainee (self-certification) and serve as total fulfillment of that particular training need.

Management training often takes place in non-discrete sessions such as corporate staff meetings, compliance meetings, or other informal sessions and even self-directed learning sessions. These sessions often are of better quality for managers and can be documented by the trainee (self-certification) and serve as total fulfillment of that particular training need.

In summary, non-CHLM sponsored training may be completed and documented to fulfill the training requirements contained in this plan. The training, if it is to be used as fulfillment of the requirements contained herein, must be documented appropriately..

2.00 CHLM Sponsored Training courses

The training program is centered around the adequate training of facility personnel. CHLM's employees are to be trained with safety and environmental protection as the primary concern. Training can be obtained from many sources, and frequent off-site training is encouraged to allow the free exchange of new ideas. However, to ensure that a basic core training program is available to our employees, CHLM sponsors and administers a comprehensive Training Program. The following descriptions are typical of the basic concepts administered through the CHLM Training Program. These concepts may be taught as an entire training module, as part of a single module, or as part of several modules. A list of training modules is included in Appendix I.

2.01 COMPANY ORIENTATION

All personnel, upon initial employment, are introduced to the company philosophy and method of operation as well as specific rules and regulations.

2.02 CHEMICAL TERMINOLOGY, HANDLING, AND TOXICOLOGY

This training provides a basic understanding of relevant terminology and inherent properties of the waste groups managed on-site. Precautions to be taken in handling hazardous wastes and the reasoning for such measures are emphasized. Specific consideration is given to the procedures and practices governing the transfer of materials from one mode of transportation (rail) to another (truck).

Instructions are provided by the Environmental Manager, Laboratory Manager, Operations Manager, Health and Safety Supervisor, Training Coordinator, or other technical representatives. Videotapes, slide presentations, etc. may be used to conduct training sessions. Discussions of toxicology and inherent hazards are tailored to meet the types of materials received for transfer or stored on-site.

2.03 OPERATING PRACTICES SUMMARY

All operators (e.g. heavy equipment operators, conveyor operations, etc.) will be required to be familiar with the operating practices for their respective units. Each operator will be instructed in the modules applicable to their unit, and discussions will be held to answer questions. Procedures and actions will be discussed, and actual drills may be performed in the field. Other personnel will be trained, as needed, through orientation or review of other relevant plans.

2.04 CONTINGENCY PLAN

All personnel are required to understand the Contingency Plan to the degree that it affects them and be prepared to put it into action at all times. The Contingency Plan covers response to spills, fires, releases, and other emergency situations. The Plan also discusses notification, evacuation, and clean-up procedures. This area of training includes instruction in the procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; emergency communications and alarm systems and signals; and procedures to be followed in the event of a shutdown of operations, as applicable.

Procedures and actions are discussed and actual drills may be performed in the field. These periodic drills are held to simulate fires, explosions, or releases of hazardous wastes. Reviews are conducted at least annually and when changes in facility operation or personnel affect the coordinated effort needed for an emergency response.

2.05 RESPIRATORY EQUIPMENT

For protection in atmospheres known or suspected to contain hazardous substances, designated personnel are instructed in the care and use of respiratory protection equipment. The training instructor is either a factory representative or an individual qualified due to their job skill (e.g. Health and Safety Supervisor, Training Coordinator, Fire Fighter, Paramedic, etc.). Training stresses proper use and fit and procedures for inspection and maintenance. The types of respiratory protection necessary are unique to each activity, depending on the inherent hazards of the materials handled, and the environment/area in which the material is located. For this reason, respiratory protection procedures are reviewed periodically and assessed for additional risk of respiratory insult because of changes in an operation.

Literature available for the respiratory protection equipment is read by and/or reviewed with employees. All repairs and inspections of equipment are performed by trained personnel when and where required. Reviews are held at least annually.

2.06 UNIT AND EQUIPMENT OPERATIONS

All personnel involved in the operation of hazardous waste or process equipment are required to be cognizant of proper operating procedures, emergency procedures, and maintenance particular to the unit or machinery he or she operates. Initial training covers operation of new or unfamiliar units, processes, or pieces of equipment. However, experienced personnel are also required to review the training topics -(e.g. Safety Meetings).

3.0 Implementation of Training Program

Upon employment, assignment to the facility, or assignment to a new job at the facility, a training file is created or reviewed for the employee. The training record includes a job description, a chronological summary of all training, and a summary of required training. Training may begin before the employee works with hazardous waste but must be completed within six months of their start-work date. Employees do not work in an unsupervised position until the required training is completed. Each employee will participate in a review of his or her initial training at least annually (once per calendar year). Also included in the training file are records that document that the required training has been completed. An example of one type of training record which may be used is included in Appendix I.

A list of training modules currently taught is included in Appendix I. Modules are typically all or part of the basic concepts described in Section 2.0. Procedures are typically included as part of a module. For example, procedures related to drum labeling would be included in the container management training module. The list is subject to change as procedures and facility capabilities change. The training times associated with each module are tailored to meet the training needs of each employee. Understanding of the topics covered may be demonstrated through written, oral, or practical exams. Written exams, when used, will be included as part of the training record. CHLM Avard Transfer Station

Personnel Training Program

Appendix I

CLEAN HARBORS ENVIRONMENTAL SERVICES TRAINING ROSTER SHEET

Location:			Course Date:	
Course Name:			Course Code(s):	
	Branch Code		Course Duration:	
Employee ID #	4 digits	Employee Name	Signature	Instructor Notes
Instructor Name:			Instructor Signature:	
Training Director:			Facility Manager	
Date:				Page# of
Location:			Course Date:	

CLEAN HARBORS ENVIRONMENTAL SERVICES TRAINING ROSTER SHEET

Course Name:			Course Code(s):	
			Course Duration:	
Employee ID #	Branch Code 4 digits	Employee Name	Signature	Instructor Notes
Instructor Name	e:		Instructor Signature:	
Subject to Review by Training Director	/ r:		Facility Manager	
Date				Page# of

Classellashave

	200 L									
Course	#	Course Title	Delivery	Repeat	Facility Operatio	Superviso r	LG Facility General Manager	LG Facility General Manager	Lab Chemist	Equipme nt Operator
General	Drives a compa Works in the F i Works with too	ny C ommercial or E eld/ O ffice/ S hop? Is and equipment?	Business/light du	uty vehicle?	Y F Y		Y F Y	Y O N	N O Y	Y F Y
					_				_	
		Alcohol and Dru	gTest			•	•		•	•
		Audiometric Tes	t							
a		DOT Physical								
dic		Fitness Assessm	ent							
ž	MED0001	HAZMAI Physica	al			•	•		•	•
		Hepititas B Vacc	ine							
	1150071	PFI Overstitestive Fit	Teet			•	•		•	•
	HS60/1	Quantitative Fit	lest		_	•	•	-	•	•
	MT1165	Alcohol & Drug-	Fr Online			•	•			
	MT1666	Alcohol & Drug-	Fr Online			•	•	<u> </u>		-
	HS4500	CH Employee H&	V Online				•		•	•
	MT2030	Clean Harbors O	vonline			•	•	•	•	•
	MT3012	Customer Now	Online			•	•	•	•	•
	MT2075	Electronic Comn	n Online			•	•	•	•	•
	CA1002	Ethics	Online			•	•	•	•	•
	EV0244	Fatigue Manage	m Online			•	•	•	•	•
	VID300	Safety 3-6-5	Online			•	•	•	•	•
	MT2065	Search & Inspect	ticOnline							
	MT2070	Search & Inspect	ticOnline			•	•	•	•	•
	MT3201	Social Media	Online			•	•	•	•	•
	SSWK01	Start Safe Week	1 Online			•	•	•	•	•
	SSWK02	Start Safe Week	2 Online			•	•	•	•	•
	SSWK03	Start Safe Week	3 Online			•	•	•	•	•
Ę	SSWK04	Start Safe Week	4 Online			•	•	•	•	•
ora	SSWK05	Start Safe Week	5 Online			•	•	•	•	•
r p	SSWK06	Start Safe Week	6 Online			•	•	•	•	•
ŏ	SSWK07	Start Safe Week	7 Online			•	•	•	•	•
	SSWK08	Start Safe Week	8 Online			•	•	•	•	•
	SSWK09	Start Safe Week	9 Online			•	•	•	•	•
	SSWK10	Start Safe Week	1 Online			•	•	•	•	•
	SK20D4	Final Exam Part	1 Online			•	•	•	•	•
	SSWK11	Start Safe Week	1 Online			•	•	•	•	•
	SSWK12	Start Safe Week	1 Online			•	•	•	•	•
	SSWK13	Start Safe Week	1 Online			•	•	•	•	•
	SSWK14	Start Safe Week	1 Online			•	•	•	•	•
	SSWK15	Start Safe Week	1 Online			•	•	•	•	•
	SSWK10	Start Safe Week	1 Online						•	•
	SSWK1/	Start Safe Week	1 Online						•	•
	221/K10	Start Safe Week	1 Online						•	•
	SSW/K19	Start Safe Week	2 Online						•	•
	SSW20D5	Final Exam Pt 2	Online			•	•		•	•
L			5							
	HS2000	OSHA HAZWOPE	R Instructor			•	•			
1	HS2100	OSHA 24 Hour H	A Instructor					•	ET	•
1	HS6301	HAZCOM - Glob	a Multi	Annual		•	•	•	•	•
1	HS6302	Medical	Multi	Annual		•	•	•	•	•
1	HS6303	Respiratory	Multi	Annual		•	•	•	•	•
	HS6304	Conf Space/Hea	t ! Multi	Annual		•	•	•	•	•
	HS6305	Personal Protect	iv Multi	Annual		•	•	•	•	•
	HS6306	Decontaminatio	n Multi	Annual		•	•	•	•	•
	HS6307	Site-Specific	Multi	Annual		•	•	•	•	•
	HS6308	Drum and	Multi	Annual		•	•	•	•	•
	HS4010	Bonding &	Instructor			•	•			
	HS6020	Fire Safety	Instructor			•	•	•	•	•
.	HS0010	H&S Admin Personi	ne Unline							
ety		Confined Space	Instructor	٨٠٠٠٠٠						
Saf		Confined Space	Instructor	Annual						
ş	HC1020	Fair FIOLECTION	Instructor	2 years					•	_
1 1	101000	TI IST AIU / CPR	matructor	2 years				-	-	-

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Course #	#	Course Title	Delivery	Repeat	Facility Operatio ns Superviso r	LG Facility General Manager	LG Facility General Manager	Lab Chemist	Equipme nt Operator
eal	HS4090	Hot Work Permit	Online		•	•			
Ĩ	HS4055	Lockout / Tagout	Online		•	•	•		
	HS7020	Loss Prevention	Instructor		•	•			
	HS7003	Pressure Washer	Instructor			•			
	HS4003	Scaffold User/Aer	Instructor						
	HS4115	Stationary Crane	Instructor						
	HS5205	Chemical Hygeine Pla	Instructor		•	•		•	
	LCR001	Life Critical Rule - Wo	Online		•	•	•	•	•
	LCR002	Life Critical Rule - Alv	Online		•	•	•	•	•
	LCR003	Life Critical Rule - Ov	Online		•	•	•	•	•
	LCR004	Life Critical Rule - Exc	Online		•	•	•	•	•
	LCR005	Life Critical Rule - Life	Online		•	•	•	•	•
	LCR006	Life Critical Rule - Illio	Online		•	•	•	•	•
	LCR007	Life Critical Rule - Ing	Online		•	•	•	•	•
	LCR008	Life Critical Rule - Nev	Online		•	•	•	•	•
	LCR009	Life Critical Rule - Un	Online		•	•	•	•	•
	LCR010	Life Critical Rule - Nev	Online		•	•	•	•	•
	FT2050	Annual PCPA Trai	ning				-		
1	CP3020	Rattony Packing	ini B				•	•	
	CP3020 FT5022	Container Selection	Online						
	ET3022	DOT Regulation H	az Mat Empl		•				
	ET2002	Driver Vehicle Ins	Online				-		
	C\$3195	Drum Worksheet	Online						
	E55155 FT1175	Equipment Trailer	Training						
	FT2004	Fed Motor/CH Po	Online						
	ET2120	Alchohol & Drug	l Online						
	ET5019	Hours of Service/	IOnline						
	ET5014	Haz Waste & PCB	Instructor	?					
	ET5020	T5020 Load Securement Instructor							
_	EV0244	Fatigue Managem	Online		•	•	•		•
tio	CS3290	Pick Up DVIR Mod	dule						
rta	ET4051	Pre-Post Trip /Use	Online						
spo	ET4015	Release / Incident	Online						
ran	ET5021	Shipping Papers	Online						
F	ET4021	Transportation Se	Online		•	•	•		•
	ET0922	Vehicle Idling Rule	Online						
	ET5025	Vehicle Inspection	Online						
	EV0222	Wet Vac 101	Instructor						
	ET5035	Zurich Defensive	Instructor		•	•	•		•
	ET5040	Zurich Defensive	Instructor						
	TC1000	TC AwarenessLoa	Online		•	•	•	•	
	TC1005	TC Awareness Pla	Online		•	•	•	•	
	TC1010	TC Awareness Shi	Online		•	•	•	•	
	TC1015	TC Awareness Co	Online		•	•	•	•	
	TC1020	TC Awareness Co	Online		•	•	•	•	
	TC1025	TC Awareness Co	Online		•	•	•	•	
 	FT1050	Cusco & Vactor O	Instructor						
		Cusco & Vactor C	Instructor						
	NEED CODE	Cusco & Vactor O	Instructor						
	HS4020	Powered Indus Tr	Instructor	3 Years					
	HS4026	Powered industria	Instructor						
	CP3015	Rolloff Container	Instructor						
	ET1100	Tractor with Roll-	Instructor						
	NEED CODE	Roll-Off Trailer Co	Instructor						
ent	NEED CODE	Roll-Off Trailer OJ	Instructor						
шd	ET1060	Straight Rolloff O	Instructor						
qui	NEED CODE	Straight Roll-Off C	Instructor						
ŭ	NEED CODE	Straight Roll-Off	Instructor						
1	ET1040	Straight Vacuum	Instructor						
1	NEED CODE	Straight Vacuum	Instructor						
1	NEED CODE	Straight Vacuum	Instructor						
	ET1111	Vacuum Trailer Co	Instructor						
1	ET1112	Vacuum Trailer O	Instructor						
1	ET1110	Vacuum Trailer O	Instructor						

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Cour	se #		Course Title	Delivery	Repeat	Facility Operatio ns	Superviso r	LG Facility General Manager	0	LG Facility General	Manager	Lab Chemist		Equipme nt Operator	
	L.	T1161	Vana Rump Opar	la aku saka u								-			
	Ľ	11104	Valle Fullip Opera	Instructor											
pet	H Ies	IS6500	Confined Space	Instructor			•	•							
Com	H enc	154095 154080	Hot Work Authori	Instructor			•	•					•		
Ľ		134000	Lockout / Tagout	mstructor											
	Н	IS6130	Accident	Instructor	N/A		•	•			•		•		•
		ЛТ1166 ЛGMT11	Basic Communica Behavioral Trainin	Unline	N/A		•				•				
	0	021008	Comp Dist Unifor	Instructor	N/A		-	-			-				
	н	IMM007	Crisis Managemer	Instructor	N/A										
	н	IMM008	Customer Focus	Instructor	N/A										
	н	IMM009	Decision Making	Instructor	N/A										
	S	A1141	Decontamination	Online											
	N	AT1004	Delegation	Online	NI / A										
	э. Э	A1142	Developing Emplo	Instructor	N/A N/A										
	н	IMM012	Difficult Interactic	Online	N/A										
	н	IMM014	Diversity	Instructor	N/A		•	•	·						
	N	/T1585	Essentials of Supe	Instructor	N/A										
	н	IMM015	Ethics at Work	Instructor	N/A										
	Н	IMM016	Feedback Essentia	Online											
	н	IMM019	Goal Setting	Instructor	N/A										
	н	152700	Hazwoper Man/Si	Instructor	8 nours										
	н	150140	Injury Reporting/(Instructor	N/A										
, s	н	IMM024	Leading and Motiv	Instructor	N/A										
	; н	IS7020	Loss Prevention	Instructor											
	S.	A1143	Manhole Cleanou	Online											
	΄ Η	IMM028	Negotiating	Online											
	S	A1144	Non-Emerg Spill C	Online	NI / A										
	ь Л	A1145 IMM030	Performance App	Instructor	N/A N/A										
	N	/T2050	Performance App	Online	1974										
	н	IMM032	Persuading Other	Instructor	N/A										
	E	D13MG/MT2080	Preventing Workp	Online			•	•			•				
	S	A1146	Pumpouts/Vac Se	Online											
	S	A1147	Sep/Sump/Washt	Online											
	S	A1148	Site Excav/Soil Re	Instructor	N/A										
	н	1010035	Substance Abuse	Live Meeting	N/A N/A										
		AT2020	Supervisor Safety	Instructor	N/A										
	н	IMM040	Team Leadership	Instructor	N/A										
	н	IMM041	Team Manageme	Instructor	N/A										
1	н	IMM042	Time Managemer	Instructor	N/A										
1	Ē	11000	Trainer Instruction	Instructor	N/A										
	۲. ک	A1149 T2125	Reasonable Succio	Online			•				•				
1	E	T5150	Methane Gas Safe	Instructor	N/A										
					· · · · · · · · · · · · · · · · · · ·										
	Ν	/T4001	Asset Mgmt Progr	Online			•	•			•				
	M	/114005	Assets Requiring A	Online			•	•			•				
	C	S1000	Beacon Overview	Online											
	c	S3005	Beacon 2 - Search	Online											
	C	\$3010	Beacon 3 - Contac	Online											
	С	\$3015	Beacon 4 - Prefere	Online											
	С	\$3020	Beacon 5 - Accour	Online											
1	C	\$3025	Beacon 6 - Pipelin	Online											
	C	53030	Beacon 7 - Call No	Online											
	c c	.33035 `\$3040	Beacon 9 - Invoice	Online											
1	C	S3050	Beacon 11 - Reno	Online											
	c	\$3055	Beacon 12 - Task	Online											
1	С	\$3060	Beacon 13 - Instru	Online											
I	С	\$3115	Bulk Quote Mana	Instructor	N/A										

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					s o	- 5	- 5	.	e z
Course #	ŧ	Course Title	Delivery	Repeat	lity ervi	lity Ieral 1age	lity Ieral 1age	mist	ipm erato
					Faci Ope ns Sup r	LG Ger Mai	LG Faci Ger Maı	Lab Che	ope Ope
	CS3200	Bulk Worksheet C	Instructor	N/A				-	
	MT6000	Compatability Wo	Online		•	•	•		
	CS3160	Container Manage	Online						
	SD0100	Customer Service	Online						
	SA1025	Customer Service	Online						
	CP4001	Cylinder Eval & Sh	Online						
	CS3230	Document Scan a	Online						
	CS3120	Drum Quote Man	Instructor	N/A					
	MT4025	DVIR Entry WIN	Online		•	•	•		
	CS3310	Employee Portal 1	Online						
	CS1017	FS Direct Ship Sale	Online						
	HH0003	HHPC Drum User	Online						
	HH0004	HHPC DVIR User O	Online						
	HH0006	HHPC Timecard K	Online						
	HH0007	HHPC Trip & Disp	Online						
	MT6001	Electronic Inspect	ions		•	•	•		
	MT6002	Compliance Calno	lar			•	•		
	MT6003	Tank Managemer	it System			•	•		
	MT6008	Hub Compliance \	Online		•	•	•		
	MT6004	Incident Manager	Online		•	•	•		
	MT6006	Certificate of Disp	Online			•	•		
	CS3235	Kiosk Time Entry I	Online						
	SA1030	Legal Contract Re	Online						
	CP1075	MAAs and SAAs	Online						
	MT4030	Maintenance Wor	Online						
	CS3260	Managing Custom	Online						
	CS1033	Managing Lithium	Batt Off Spec						
	MT4040	Mechanic Workbe	Online						
	CS1072	Microsoft Office T	Instructor	N/A					
ms	CS3245	Month End Close	Online						
ste	MT4010	My Assets	Online		•	•	•		
sγ	SS2016	New Employee or	Online						
	CS1030	Off Spec Manager	Online						
	MT6009	Off-C Workbench	Online		•	•	•		
	CS1060	Online Services D	Online						
	CS1051	Online Svc - Gene	Online						
	CS1054	Online Svc - Inven	Online						
	CS1052	Online Svc - Profil	Instructor	N/A					
	CS1053	Online Svc - Repo	Online						
	CS3185	Open Order Mana	Online						
	MT1485	Open Vendor PO	Online						
	CS1025	Order Mgt/Sched	Instructor	N/A					
	CS3070	Outlook Training	Online						
	CS3270	PCard Workbench	Online						
	MT1480	PeopleSoft AP PO	Unline						
	MT1470	PeopleSoft AP PO	Unline						
	CS3075	PeopleSoft Expen	Online						
	M11554	Peoplesoft Invent	Online						
	MT1552	PeopleSoft Invent	Online						
	MT1550	PeopleSoft Invent	Online						
	MT4020	Permits and Regis	Online		•	•	•		
	M13010	Prevailing wage I	Online						
	CS3110 CS3105	Pricing Contract N	Online						
	CS3105	Pricing Guidelines	Online						
	CS3175	Print Paperwork	Online				-		
	IVI 1 3020		Online				•		
	CS3165	Purchase Order IV	Online						
		Reactive Material	Online						
	CS2120	Research Bosoir	Online						
	C33100	Sales Force	Online						
	MT4015	Short Term Ports	Online				•		
	C\$3250	Site Service Chan	Online				-		
	MT2010	Smarter Workhon	Online						
	C\$3190	Task Workshoot C	Online						
	CS3206	Task Worksheet F	Online						

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Course #	#	Course Title	Delivery	Repeat	Facility Operatio ns	Superviso r	LG Facility General Manager	LG Facility General Manager	Lab Chemist		Equipme nt Operator
	CS3225 MT3009 ET5018	Time Keeping Rec Trip & Dispatch N Trip & Dispatch R	Online Online Online			•	•	•			
	CS3155 CS3130 CS1035 CS3207	Umbrella Order M Umbrella Quote M Unbilled Report	online Online Online								
	CS3099 CS3089 MT4091	Waste Class Code Win Web Profile I California Meal ar	Instructor Online Online	N/A			•	1			
	MT3021 HX6010	California Meal ar Automated Ext. D	Online Instructor	2 Years		•	•				
Site Specific Required Training	BL1001 BL1002 BL1003 BL1004	BW QRTRLY RCRA BW QRTRLY RCRA BW QRTRLY RCRA BW QRTRLY RCRA	Instructor Instructor Instructor Instructor	Annual Annual Annual Annual		•	•				
Training	SS0345 SS1061 SS1156	Deer Trail Rad Saf Injury and Illness Visitor Security Pollic	Instructor Prevention Progra y Training	? m		•	•	•		•	•
ic Required	SS1158 SS1161 SS1220 SS2001	Clean Compliance - G CA DTSC Manifest Tra Site Permit Training F	anning M Training aining Instructor	?		•	:		-		
Site Specif	SS2005 SS2010 SS 2016	Site Specific RCRA Waste Analysis Plan New Employee Orien	Instructor Instructor Instructor			•	• •	•	•		•
	SS2025 SS2026 SS 2041	Contingency plan Site Specific Evacuati Facility Inspection Tr	Instructor Instructor Instructor			•	• •	•			
I	SS5001 SS2100 SS2210 SS2210	Wildlife Training Bulk Scheduling SOP Asbestos Wasrte Mar Brobibited Waste N	Instructor Instructor Instructor	? ? ?	-	•	:	•			
	SS2211 SS2212 SS2213 SS2214	Random Load Check Altair Recordkeepir Stormwater monito	Instructor Instructor	: ? ?							
	SS3590 SS2035 SS2036	Litter Control SPCC Training SW Poll Prev Plan	Instructor	?					•		
	SS2051 SS2052 SS2053	General Permit Cor General Facility Cor Haz Waste Storage	Instructor Instructor Instructor	? ? ?							
	SS2054	Haz Waste Storage	Instructor	?							

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Training Matrix 2018

SSWK20

SSW20D5

Start Safe Week 20 Final Exam Part 2



Course #	Course Title	Course #	Course Title
	Alcohol and Drug Test	HS2100	OSHA 24 HAZWOPER
DED0001	HAZMAT Physical	HS6301	HAZCOM - Globally Harmonized System
HS6071	Quantitative Fit Test	HS6302	Medical Surveillance/Bloodborne Pathogens
MT1165	Alcohol & Drug-Free Workplace (Employees)	HS6303	Respiratory Protection
HS4500	CH Employee H&S Orientation	HS6304	Confined Space/Heat Stress
MT2030	Clean Harbors Overview	HS6305	Personal Protective Equip/Hearing Conservation
MT3012	Customer Now	HS6306	Decontamination
MT2075	Electronic Communication & Email Policy	HS6307	Site Specific H&S Plan/Emergency Response
CA1002	Ethics	HS6308	Drum and Container Handling
EV0244	Fatigue Management	HS6020	Fires Safety
VID300	Safety 3-6-5	HC1080	First Aid/CPR
MT2070	Search & Inspection Policy SUP	LCR001	Life Critical Rule - Work Permit Safety
MT3201	Social Media	LCR002	Life Critical Rule - Always Protect Employees working above 4 feet
SSWK01	Start Safe Week 1	LCR003	Life Critical Rule - Overhead lifting Safety
SSWK02	Start Safe Week 2	LCR004	Life Critical Rule - Excavation Awareness
SSWK03	Start Safe Week 3	LCR005	Life Critical Rule - Life Saving PPE
SSWK04	Start Safe Week 4	LCR006	Life Critical Rule - Illicit Drugs and Alcohol
SSWK05	Start Safe Week 5	LCR007	Life Critical Rule - Ignition Sources in Unauthorized Areas
SSWK06	Start Safe Week 6	LCR008	Life Critical Rule - Never Operate Equipment for which you have not been trained
SSWK07	Start Safe Week 7	LCR009	Life Critical Rule - Unauthorized Weapons in the Workplace
SSWK08	Start Safe Week 8	LCR010	Life Critical Rule - Never Operate Tools and Equipment Unsafe
SSWK09	Start Safe Week 9	ET5035	Zurich Defensive Driver - Business Vehicle
SSWK10	Start Safe Week 10	HS6130	Accident Investigation
SK20D4	Final Exam Part 1	SS1156	Visitor Security Policy Training
SSWK11	Start Safe Week 11	SS2016	New Employee Orientation Training
SSWK12	Start Safe Week 12		
SSWK13	Start Safe Week 13		
SSWK14	Start Safe Week 14		
SSWK15	Start Safe Week 15		
SSWK16	Start Safe Week 16		
SSWK17	Start Safe Week 17		
SSWK18	Start Safe Week 18		
SSWK19	Start Safe Week 19		



CHLM Avard Transfer Station

Development and Operations Plan,

Section 11:

Procedures for Ignitable, Reactive, and Incompatible Wastes

March 2018

Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste

It is not anticipated that relatively large volumes of ignitable or reactive waste would be managed at the transfer station. Should ignitable and reactive wastes be shipped through the Avard transfer station, they will be identified upon receipt at the transfer station by the use of shipping documents, acceptance documents, etc.

If ignitable or reactive wastes are shipped through the transfer station, they will be separated and protected from sources of ignition or reaction such as open flames, smoking, metal cutting, welding, frictional heat, sparks (electrical, static, or mechanical), spontaneous ignition (e.g.; from heat-producing chemical reactions), and high-intensity radiant heat.

In order to prevent the mixing of incompatible wastes, they are not placed in the same container. Incompatible wastes will be identified upon receipt at the transfer station by the use of shipping documents, acceptance documents, etc. The transfer containers (e.g.; dump trucks, gondola boxes, etc.) are inspected prior to use to ensure the container is free of residues of previous, potentially-incompatible waste. Prior to compatibility testing, the records will be reviewed to evaluate potential incompatibility. If there is no indication of significant incompatibility in those records, representative samples of the wastes to be bulked together will be mixed and observed to ensure their compatibility. If the wastes demonstrate potential incompatibility, they will not be bulked together. Some examples of waste incompatibility are the generation of significant amounts of heat, large amounts of precipitate, unacceptable increases in viscosity, and undesirable layering.

"No Smoking" signs will be placed conspicuously wherever there is a potential hazard from ignitable or reactive wastes.

General Precautions for Handling Ignitable, Reactive, and Incompatible Waste

The Avard transfer station is primarily designed for the transfer of solid waste from rail cars into gondola boxes or dump trailers. Other types of transfer activities should be of a relatively minor amount. The treatment of wastes is not intended or expected. Precautions are taken during the transferring of wastes to prevent reactions which generate extreme heat, or pressure, fire or explosions, or violent reactions; which produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment; which produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion; which damage the structural integrity of the transfer station; or which through other like means threaten human health or the environment.

During the handling of ignitable, reactive, or incompatible wastes, CHLM personnel utilize the following procedures:

- No smoking, open flames, or other sources of ignition are allowed in the transfer station except in designated areas.
- Facility personnel ground the trucks and containers to avoid the accumulation of static charges prior to unloading rail cars which contain bulk ignitable wastes.
- Facility personnel utilize adequate protective gear to protect themselves when handling ignitable, reactive, or incompatible wastes.
- Facility personnel do not place incompatible or reactive wastes in containers contaminated with other incompatible or reactive wastes.
- 5) When handling ignitables in buildings, the vapors are continually swept by ventilation systems (including open air buildings). No smoking, open flames, or other sources of ignition are allowed in the transfer station except in designated areas.



CHLM Avard Transfer Station

Development and Operations Plan,

Section 12:

Inspection Program

,March 2018

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DECONTAMINATION EQUIPMENT	12-4	
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Container Inspection		
Transfer Building Inspection		
General Inspection Requirements		

Appendix I - Inspection Schedule and Inspection Logs

Transfer Station Inspection Schedule

The safe and productive operation of the Clean Harbors Lone Mountain, LLC (CHLM) Avard transfer station requires that all equipment and structures be maintained in proper working order. To accomplish this goal, a comprehensive schedule for the inspection, maintenance, and repair of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment has been developed. This schedule is kept at the facility.

The inspection schedule in Appendix I indicates the areas to be inspected, what should be examined, and the frequency. The frequency of the inspection is based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. Daily and/or weekly facility inspections will only be performed when waste is physically present, and/or the transfer station is operational (i.e.; transfer activities in progress).

Emergency Equipment Inspection

According to state and federal requirements, "All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment where required, must be tested and maintained as necessary to assure its proper operation in time of emergency."

The following discussion and summation is presented to outline the procedures CHLM uses to ensure emergency equipment is in proper condition when, and if, it is required by emergency conditions at the transfer station¹.

¹ Some equipment is inspected and repaired by an equipment specialist (e.g.; fire extinguisher sales/services companies) who are not facility employees. These service companies may either repair the equipment on-site or remove the equipment and return it when repaired.

COMMUNICATIONS AND ALARM SYSTEMS

The public address system at the transfer station is tested daily via signal broadcast. Portable radios and/or a mobile phone are operated daily. The internal/external telephone system is tested daily to ensure it is operational.

All of the above listed equipment is on the facility inspection schedule and is maintained and repaired or replaced, as necessary.

FIRE PROTECTION EQUIPMENT

The water level in the 36,000 gallon water storage tank is checked weekly. Additional water is added as necessary in order to ensure that the fire water storage tank is at least half full. The tags of fire extinguishers are inspected weekly for expiration dates and the pressure gauges are checked for adequate pressure. The water pump and lines are inspected weekly for significant leaks. The water pump is additionally checked regularly via operations use for proper functioning and external conditions.

All of the above listed equipment is on the transfer station inspection schedule and is maintained and repaired or replaced, as necessary.

SPILL CONTROL EQUIPMENT

Spill control equipment comes in many fashions. First, the collection system "sumps" in secondary containment systems will be inspected daily for evidence of liquids. Liquids, other than rainwater from recent or active storms, will be removed, if present in other than "de minimis" levels, within 24 hours. Liquids from recent or active storms will be removed within 72 hours, if the secondary containment area is no longer capable of holding the volume of the largest highway container which could be placed in it (i.e., 6,000 gallons). Containment systems will be inspected daily for signs of spills or leaks. Spill

control materials (e.g.; stabilization agents) are inspected daily for adequate supply. Should evidence of spills or leaks be discovered, they will be removed within 24 hours and disposed appropriately.

All of the above listed equipment is on the transfer station inspection schedule and is maintained and repaired or replaced, as necessary.

DECONTAMINATION EQUIPMENT

Personnel decontamination equipment, such as eye wash stations and safety showers, are inspected weekly for operability.

All of the above listed equipment is on the transfer station inspection schedule and is maintained and repaired or replaced, as necessary.

MISCELLANEOUS EMERGENCY EQUIPMENT

Besides those items specifically annotated in the state and federal regulations, CHLM has other miscellaneous equipment which may be called upon during an emergency. Although these miscellaneous pieces of equipment are not set aside explicitly for emergencies, they are, none-theless, important when considering the facility's capabilities. For example, site vehicles and equipment can be utilized to carry victims or equipment from one place to another. Heavy equipment may be utilized to dig a ditch or build a berm. Even though this equipment is not set aside for emergency use only, it is normally present as a matter of course in performing the business of transferring solid or hazardous waste. In as much as this is operational equipment, it is not included in the facility inspection schedule.

However, there are other miscellaneous pieces of equipment which do not fall directly under the headings of the state and federal regulations, which are maintained on-site for the primary, if not sole, purpose of responding to emergencies. This equipment is discussed below.

12-4
<u>Self-Contained Breathing Apparatus (SCBA)</u> - is inspected weekly for adequate pressure; for proper operability and condition; to ensure regulators are unobstructed; and to check masks and hoses for serviceability.

<u>First Aid Kits</u> - the first aid kits are maintained in several locations at the facility and are inspected for missing items and adequate supply.

Entrance/Exit Gates - the gates prevent the unknowing entry, and minimize the possibility for unauthorized entry of persons or livestock onto the active portion of the facility. The gates are inspected daily to ensure their proper function. Warning signs per 40 CFR 264.14 are also posted on the fences/gates.

All of the above listed equipment is on the transfer station inspection schedule and is maintained and repaired or replaced, as necessary.

Container Inspection

The staging area will be checked daily for evidence of spills or leaks. The containers will be visually inspected upon receipt, and thereafter prior to off-site shipment, for evidence of leaks, corrosion, or deterioration. The contents of deteriorated containers will be transferred to a container in good condition or overpacked (for drums).

Transfer Building Inspection

All concrete slabs and curbs associated with the transfer building secondary containment system will be visually inspected for cracks, gaps², flaking, chips, gouges, and other signs of wear on a daily basis. Similarly, the roof will be visually checked for leaks, tears, and other signs of deterioration. The "sumps" associated with the transfer building will be checked on a daily basis

² Cracks and gaps in the concrete surface will be corrected in a timely fashion. It is noted that superficial or insignificant cracks and gaps may occur in concrete surfaces which do not infringe upon the integrity of the secondary containment system.

for the presence of liquid, as described above. A daily check of the staging area and transfer building will be made in order to ensure that incompatible wastes, if present, are properly segregated through separation distance.

All of the above listed equipment is on the transfer station inspection schedule and is maintained and repaired or replaced, as necessary.

General Inspection Requirements

It is the ultimate responsibility of the owner/operator to ensure that all inspections are performed as required. The inspections are part of the daily operations routine for the transfer station. The results of the inspections are recorded in an inspection log. These records are maintained for at least three (3) years from the date of inspection. They include, at a minimum, the date and time of inspection, the name of the inspector, a notation of the observations made, and the nature and date of any repairs or other remedial actions.

Routinely, inspections are recorded on digital instruments or tablets, with example screens shown in Appendix 1. Should said tablets not be available, records will be kept on paper and transferred to the digital records when they are available.

Should a problem be noted during routine inspections, it is recorded in the inspection log and reported to the Rail Transfer Coordinator or his/her designee. Such problems are corrected on a schedule to ensure there does not exist a significant threat to human health or the environment. A sample of the CHLM Avard transfer station Inspection Logs and instructions for completion of such are found in Appendix I. Appendix I

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material, containers, (e.g. overpack					(
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Entrance/exit gates: Operate to check for proper function. Ensure warning	0 1 655	0.100	0.00				Staging areas: Check for evidence of leaks or spills	0 1 055	() rom	0 10/4					
signs are posted and visible.							icola of spins								
Inspection Unit/Area: Loading/unloa	ding Area, S	Storage, and	Truck Parking	Areas											\odot
Check for evidence of spills or leaks. C Check roof of transfer building for leak	heck concret s, tears, and	e slab, conta other signs o	inment walls, an of deterioration.	d sumps for crack Ensure incompati	s, gaps, flaking, ch ble wastes are sec	ips, gouges, and sigr regated. Check cont	s of wear. Check for liquids, if present, to en siners for evidednce of leaks, corrosion, or d	nsure remova leterioration.	I. Check arou	und containm	ent for signs	s of leaking (ji.e.; wet spots, o	r dead vegitat	tion).
	Dare	() Esil	O N/A				Staging area - Check for evidence of	O Dare	0.64	O N/A			Ţ		
Transfer building	U Fass	U raii	U IVA				spills or leaks. Ensure incompatible wastes are wgregated. Check for	0 1 435	U raii	U N/A				<u> </u>	-
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liquids, if present, to ensure removal.	U Pass	U Fall	U N/A	*]	*	¥									
of leaking (i.e.: wet spots or dead															
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Transfer Building					Emergency containment			
First aid kits - Check for missing items	and adequate su	oply.						
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SCRA - Inspect for adequate								
pressure,; proper operability and	O Pass	🔵 Fail 🛛 🔘 N/A	•	v	•			
unobstructed; check masks and hoses								
to ensure they are in good condition and serviceable.								
Misc. Safety Equipment - Ensure an add	equate supply of	cartridge respirators, tyv	eks, gloves, etc.					
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Water pump - Start and run to check	O Pass	O Fail O N/A	v	× ×	Water lines - Check lines for	V Pass V Fail V N/A		
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CHLM Avard Transfer Station

Design and Operations Plan,

Section 13:

Closure Plan

March, 2018

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Introduction

Clean Harbors Lone Mountain LLC. (CHLM) will close the Avard transfer station in a manner that minimizes the need for further maintenance and controls, minimizes, or eliminates a threat to human health or the environment. The station will be closed such that, following closure, hazardous waste or constituents will not be released into the air, surface water, ground water, or soil in sufficient quantities to threaten human health or the environment. Since all hazardous waste trans-loading operations (moving waste from one container to another) will have occurred in the transfer building, this Closure Plan will concentrate primarily on the building and its immediately surrounding area. The objectives of this Plan will be accomplished using a variety of mechanisms as discussed below. After decontamination, the transfer building, and other ancillary equipment may be left in place for use by others for non-Hazardous waste uses.

This Closure Plan addresses that portion of the Avard Transfer Facility which meet the definition of a "transfer station" as established under the Oklahoma Department of Environmental Quality (DEQ) Rules and Regulations for Hazardous Waste Management (252:205-15-1). The transfer <u>facility</u> may operate as a separate activity before, during, and after closure of the transfer <u>station</u>. Other activities may be involved with the operation of the Avard Facility under the provisions of 40 CFR 262.17 applicable to generators of hazardous waste. The transfer <u>facility</u> and generator-status portions of the Facility are not covered by this Plan.

The operation of the Avard transfer station is integrally related to the CHLM Lone Mountain Facility located approximately 26 highway miles to the south. Waste handling activities at the transfer station should predominantly be a direct result of the ultimate disposal of the waste at Lone Mountain. However, the facility can also function for the transfer of waste to other treatment, storage, and disposal or recycling facilities. Transfer of other goods, raw materials,

commodities, etc. is also possible and is not covered by the provisions of the hazardous waste regulations or this Plan.

Partial and Final Closure Activities

In the context of the operations at the Avard transfer station, final closure will constitute the final cessation of all use of the transfer building for the trans-loading of waste. Normal operations will involve the startup and shutdown of the station (or portions of the station) on a regular basis. This is the nature of the use and need of such a station. These regular activities do not constitute partial or final closure, regardless of the time frames involved. Final closure begins only when a decision is made by CHLM that the entire station (building) is no longer needed for waste trans-loading and will not be used again for that purpose in the foreseeable future.

Partial closure will constitute the permanent closure of a portion or function of the transfer station (e.g.; the rail gondola car to truck solids transfer operation). Partial closure excludes activities which do not reduce station capabilities. Examples of these types of activities include, but are not limited to, replacement of equipment, repairs to sumps, floors, walls, piping, etc., equipment change of service, reconfiguration of piping, and generation of debris from repairs or replacements..

Closure Plan Amendment

CHLM will amend this closure plan whenever the transfer station design or operations significantly change such that the existing Plan would not achieve the closure performance standard or the expected year of final closure changes or unexpected events realized during closure activities require the Plan to be modified. If modification of the Plan is needed, CHLM will submit a proposed modification to the DEQ for approval.

Maximum Extent of Operations

As discussed above, the transfer building at the Facility constitutes the transfer station. As such, the maximum extent of operations is limited to the building, as designed and when completely constructed and in use The maximum extent of operations will be when the station is transferring liquids, solids, and sludges both to and from the station.

Maximum Waste Inventory

The maximum inventory of waste that could be present in the transfer building at any one time during its active life is limited to two rail cars (approximately 100 tons each) and two semi-trucks and trailers (approximately 25 tons each). Thus, a maximum total of 250 tons of waste could be present In the transfer station during its active life.

Expected Year of Final Closure

Because the transfer station is so integrally-related to the operations of the CHLM Lone Mountain Facility, closure of the two facilities is most likely to occur at approximately the same time. The Lone Mountain Facility currently has an estimated closure date of 2030. For the purposes of this Plan, at this time, the transfer station is also expected to close in 2030. Should this date change in the future, CHLM will inform the DEQ of the revised, expected year of final closure.

Closure Schedule

As will be described in further detail below, several steps are involved in the final closure of the facility. Based on these steps, an estimate of the number of days required for final closure is presented below in Table 1.

TABLE 1Estimated Time Requirements ForFinal Closure of Transfer Station

ACTIVITY	DAYS
Notice of intent to close sent to DEQ; waiting period 60 days	60
Removal of waste from transfer building	10
Dismantle/dispose of equip., structures, etc.	20
Decontaminate floors, walls, etc. of building and any salvageable equipment, etc.	60
Collect rinse water and soil samples	30
Analysis of samples	60
Additional decontamination or cleanup (contingent)	30
Additional analysis of samples (contingent)	30
Certification of closure	60
TOTAL	360*

* - Total number of days for actual closure activity, excluding notification, contingency, and certification = 180 days.

Specific Closure Considerations

NOTICE OF INTENT TO CLOSE

CHLM will notify the DEQ at least 60 days prior to the date on which it expects to begin final closure of the Avard transfer station. Modifications to the approved Closure Plan could be requested at this time, if justified by facility operations or conditions, as described above.

REMOVAL OF WASTES FROM STATION

After the decision is made by CHLM to conduct partial or final closure of the transfer station, several major steps, must be undertaken to ensure that the site will meet the closure performance standard. The closure steps may occur sequentially or concurrently. The first step of the closure process will be to remove wastes from the transfer station.

Removal of the wastes from the transfer station will not require any unusual operational activity. In addition, the decision to close will most probably occur at a point when the station is not in active use, and there will not be any inventory of waste to remove. However, should the decision to close occur at a point when the transfer station is at maximum waste inventory, the wastes will be transported to the facility which is designated on the manifest or other shipping document (e.g.; bill of lading). There is no reason to assume that anyone but the designated facility should receive the final volume of wastes transferred at the station.

DISMANTLING/DISPOSAL OF STRUCTURES/EQUIPMENT

The second step of the closure process will be to dismantle and/ or dispose of certain mobile and/or fixed equipment, structures, etc. The decision to dismantle/dispose versus decontaminate and salvage, etc. will be based on many factors, some of which are salvage value of the equipment or structure, cost of decontamination, ability to-decontaminate, ability to demonstrate decontamination. For those items for which dismantling/disposal is the preferred option, CHLM will ship the material to a facility which is permitted to accept it, most likely the CHLM Lone Mountain Facility. Use of other approved facilities (e.g.; incinerators) for specific types of materials may become necessary but is not foreseen at this time.

DECONTAMINATION OF STRUCTURES/EQUIPMENT

The third step of the closure process will be to decontaminate the structures and/or equipment such that the closure performance standard is met. The permanent structural components of the station (floors, walls, etc.) will most likely be decontaminated and left in place. Other equipment (e.g.; trackhoe) may be decontaminated and salvaged for use elsewhere, or once decontaminated, could be disposed of as non-hazardous wastes. Successful completion of the decontamination process will remove the equipment or structures from the regulatory framework of RCRA.

CHLM will employ a cleaning process which adequately removes contamination and then, verify that the decontamination was sufficient using analysis of the rinse water. The cleaning processes employed during closure could be multi-phased and may include the use of methods such as scraping, sandblasting, sweeping, wiping, brushing, high-pressure washing, steam cleaning, etc. as necessary to remove the contamination. Residues from the cleaning step(s) will be managed as characteristic hazardous wastes (D001-D043), if applicable, unless the residues are specifically identifiable as one distinct wastestream which was handled at the transfer station. In that case, the residue will be managed as if it were the original wastestream (i.e., same waste code(s)).

At the completion of the cleaning process, the structures and/or equipment will be rinsed with fresh water. The rinse water will be managed as if it were a characteristic hazardous waste (D001-D043), if applicable, until it can be determined whether the items have been successfully

decontaminated. To determine whether the cleaning process has resulted in adequate decontamination, the rinse water will be analyzed for a variety of hazardous constituents as listed in Table 2 below.

If the concentrations of the constituents in the rinse water are equal to or less than the levels listed in Table 2, the cleaning process is considered to be adequate and the decontaminated structures and/or equipment are no longer within the regulatory framework of RCRA. If the concentrations of the constituents in the rinse water are greater than the levels listed in Table 2, the cleaning process is considered to be inadequate and the structures and/or equipment are still within the regulatory framework of RCRA. In the latter case, additional cleaning or rinsing and analysis will be conducted until the rinse water meets the standards in Table 2, or the equipment, structures, etc. could be dismantled/ disposed as described above.

Avard Transfer Station Table 2 Decontamination Limits for Site Closure

Possible					For	
Contaminants	S	oil Limits	Rinse water	Reference		
Constituents to be Analyzed	Cancer, 10-5 Risk, mg/kg	Non- Cancer, HQ=1, mg/kg	Notes	Decontamination Rinsewater, mg/l (10xMCL's)	40 CFR 261 Haz. Waste TCLP Limits, mg/l	
Arsenic	30	4.80E+02		0.10	5.00	
Barium		2.20E+05		20.00	100.00	
Cadmium	9.30E+03	9.80E+02		0.05	1.00	
Chromium VI	6.3	3.50E+03	*	1.00	5.00	
Chromium III		1.80E+06				
Lead		8.00E+02		0.15	5.00	
Mercury, salts		3.50E+02		0.02	0.20	
Mercury, elemental		4.60E+01				
Mercury, organic		1.20E+02				
Selenium		5.80E+03		0.50	1.00	
Silver		5.80E+03			5.00	
Total Cyanide		1.50E+02	**	2.00		
Total VOC's		5.00E+02	***			
Total PAH's, aromatics		4.20E+02	****			
Total PAH's, aliphatics		4.40E+02	"			
Total PCB's		5.00E+01	****			

RSL's based on 11/2017 EPA Risk Screening Tables

Notes:	
	Chrome VI ONLY - no cancer values listed for
*	Chrome III.
**	Lowest of all Cyanide salts listed in RSL's.
***	Based on Regulatory Level for LDR's, 40 CFR 268
****	Lowest of three ranges listed in RSL's
*****	TOSCA Limit for Regulated PCB's, 40 CFR 761

SOIL SAMPLING

The final step of the closure process will be to collect soil samples in the immediate area around the transfer station building. The majority of the samples will be collected where the trucks exit and enter the transfer station building. Three soil samples, collected from a depth of 0" to 6", will be collected at both the entrance and exit areas near the building. Two additional samples will be collected along both sides of the building where the potential for contamination to exist is very low.

In addition, the area around the building will be visually inspected for any evidence of spills. Should evidence of spillage be discovered at the time of closure, the affected soil will be sampled in place and analyzed or excavated first, followed by collection and analysis of samples from the bottom of the excavation. Excavations will be filled with clean soil after analysis has confirmed that contamination is absent.

Soils will be analyzed for those constituents identified in 40 CFR Part 268 for each hazardous waste code which was transferred in the station building. Soil analytical values will be compared to those listed for soils in Table 2, above, and if exceedances are found, after elimination of laboratory error and other possible explanations (including re-sampling), then the affected soil will be excavated and managed as hazardous waste. The waste codes which correspond to the constituents found will be assigned to the excavated soil. Sampling, analysis, evaluation, and/or excavation will continue until the soil does not contain hazardous constituents above the threshold value defined above.

In addition, the rail loop area will be visually inspected for staining, dark spots, etc., possible spills which were previously overlooked, etc., and these will be excavated to visually

clean soil. Afterwards, soil samples will be taken at approximate 500' intervals along the rail loop road, and analyzed for PCB's only. If any values exceed the listed Table 2 value, after elimination of possible sampling/analysis errors and resampling, that area will be excavated as previously noted.

CERTIFICATION OF CLOSURE

Within 60 days of completion of closure, CHLM will submit to the DEQ a certification that the transfer station has been closed in accordance with the approved closure plan. The certification will be signed by CHLM and an independent registered professional engineer.



CLEAN HARBORS LONE MOUNTAIN, LLC

CHLM Avard Transfer Station

Design and Operations Plan,

Section 14:

Closure Cost Estimate

March, 2018

Introduction

In accordance with 40 CFR 264.142 and the Oklahoma Department of Environmental Quality (DEQ Rules for Hazardous Waste Management (OAC 252:205-15-2(b)(7)),Clean Harbors Lone Mountain, LLC (CHLM) must have a detailed written estimate, in current dollars, of the cost of closing the transfer station portion of the Avard Transfer Facility in accordance with the approved closure plan.

Basis For Closure Cost Estimate

The following closure cost estimate is based on 2017 dollars at the point in the life of the transfer station when the extent and manner of its operation would result in the most expensive closure. The transfer station is also assumed to contain the maximum waste inventory at the time of closure, as stated in the closure plan. The closure cost estimate is based on the costs to CHLM of hiring a third party organization to implement and complete the closure activities specified in the closure plan.

Adjustment To Closure Cost Estimate

During the active life of the facility, CHLM will adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of the standby trust fund established as the financial assurance mechanism. The cost will be adjusted using an inflation factor derived from the Implicit Price Deflator for Gross National Product, or other appropriate measure as defined at 40 CFR 264.142(b).

In the event that modifications to the closure plan result in an increase in the cost of closure, CHLM will revise the closure cost estimate within 30 days after DEQ approval of the modified plan. The revised cost estimate will then be adjusted for inflation annually, as usual.

Retention Of Closure Cost Estimate

CHLM will maintain the current closure cost estimate, as revised or adjusted, at the Avard Transfer Facility offices and/or the CHLM Lone Mountain Facility and/or the corporate headquarters of CHLM in Norwell, Massachusetts.



Item	Item Description	Unit	Quantity	Unit Cost	T	otal Cost
1.0	Road Ballast Removal(Assumed Conaminated) and Resroration					
1.1	Removed and Load 8-inches of Road Ballast	cu. yds	2,200	\$10.00	1	\$22,000
1.2	Transport to Lone Mountain Facility(88 LoadsX60 miles Per Load)	Mile	5,280	\$ 2.50	\$	13,200.00
1.3	Disposal Cost (to Lone Mountain Landrill)	cu. yds	2,200	\$ 72.00	\$	158,400.00
1.3	Place 8-Incres of Topsoli	cyds	2,200	\$ 10.00	\$	22,000.00
1.4	Seed and Fertilize	Acre	3	\$ 6,400.000	\$	19,200.00
1.5	Total Ballast Removal, Transportation and Restoration Cost					\$234,800
2.0	Transfer Building Decontamination				+	
2.1	Removal of Waste from Building (assume Lelvel B)-Haul To LM	cu, vds	1400	\$72.00	,	\$100.800
2.2	Concrete Surface area of container management building to be	square feet	30 181			
2.2	Rinsate production from concrete washing.	gallons/sg ft	0.30		-	
2.0	Rinsate disposal volume - liquid	gallons	30 181	0.30		9 054 3
2.5	Rinsate disposal cost - (WWTP)	gallerie \$/gal	9 054 3	\$ 0.394	\$	3 567 39
2.6	Solids production from concrete washing.	gallons/sg ft	0.04	÷ 0.001	Ť	0,007.000
27	Solids disposal volume (convert gallons to cubic vards)	cu vds	30 181	0.04	1	1 207
2.8	Solids disposal cost	\$/cvd	1.207	\$ 2.29	\$	2.764.58
2.9	Steam cleaner cost - Level C	\$/square ft	30,181	\$ 0.57	\$	17.203.17
2.10	Transportation to Lone Moutain Facility (Solids & Liquids)	Mile	300	\$ 2.50	\$	750.00
2.10	Total Building Decontamination Cost (2.1+2.5 + 2.8 +2.9+2.10)				\$	125,085.14
2.0	Labor Cost				<u> </u>	
3.0	Assume 4 labors @ 8 brs/day (See Note 3)	3 210				
3.1	Labor hours need to decontaminate drum dock	5,219 bours	3 210			
3.2	Labor to decontaminate drum dock concrete	filours \$/br	3 219	\$ 15.00	¢	48 289 60
5.5		φ/11	5,219	φ 13.00	φ	40,203.00
40	Laboratory Costs					
4.0	Number of rinsate samples -liquid	sample	4	\$ 360.00	\$	1 440 00
4.1	Number of soil samles	sample	38	\$ 1 340 00	\$	50 920 00
4.3	Laboratory Costs	Gampio		• 1,010100	ŝ	52 360 00
-10					-	02,000.00
5.0	Certification of Final Closure				1	
5.1	Professional Engineer	man-hour	20	\$ 74.00	\$	1.480.00
5.2	Staff Engineer	man-hour	40	\$ 57.00	\$	2,280.00
5.3	Clerical Administrative	man-hour	20	\$ 25.00	\$	500.00
5.4	Supplies	lump sum	1	\$ 250.00	\$	250.00
5.5	Cost of Professional Certification				\$	4,510.00
						,. ,
6.0	Total Transfer Station Closure Cost				\$	465,044.74
7.0			\$ 465,044.74	0.2	\$	93,008.95
8.0	Total Transfer Station Closure Cost(w/ Contingency)				¢	558 053 60

 Table 1

 Closure Cost Estimate for Transfer Station

Notes:

1) Closure plan assumes the following conditions:

a) 20% of all containers will contain solids having no free liquids an can be landfill disposed.

b) 60% of all containers will contain solids or sludges which can be stabilized and landfilled.

c) 10% of all containers will organic liquids which will be shipped off-stie for use as fuel.

d) Assumes Rinsate & 10% of all containers will contain inorganic liquid which can be treated in the wastewater treatment system.

2) Concrete surfaces will be washed and rinsed with residual liquid and solid production being the same for tanks containment area. Liquids will be treated through the wastewater treatment system and solids will be landfilled.

3) Costs assume a 4-man crew working 8 hours/day at a rate of 300 square feet/day.

4) Rinsate samples will be analyzed for Oil & Grease, Phenols, RCRA metals, TOX, TOC, and cyanides as required by closure plan.

5) Soil samples will analyzed for Appendix IX constituents.



CHLM Avard Transfer Station

Design and Operations Plan,

Section 15:

Financial Assurance For Closure

And Liability Requirements

March 2018

Financial Assurance For Closure

Clean Harbors Lone Mountain, LLC (CHLM) has established an appropriate financial assurance mechanism to ensure that closure of the Avard transfer station can be completed in accordance with the performance standard of 40 CFR 264.111 and the approved Closure Plan. Six (6) options exist under 40 CFR 264.143 (a) through (f) as means of providing financial assurance for closure.

After DEQ approval of the Closure Plan contained in the Avard Transfer Station Development & Operational Plan Renewal, CHLM will continue to maintain and properly fund the financial assurance mechanism. Copies of the standby trust agreement and the irrevocable letter of credit (or other appropriate mechanism) are attached, and any renewals or changes will be submitted to the DEQ and maintained by CHLM.

Liability Requirements

CHLM has established appropriate liability coverage for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from the operations of the Avard Transfer Facility. The liability coverage will be maintained in amounts equal to or in excess of the regulatory levels under 40 CFR 264.147(a). CHLM has obtained a liability insurance policy for the purposes of compliance with the regulatory requirements. The certificates of insurance are attached for reference.

Coverage for non-sudden accidental occurrences under 40.CFR 264.147 (b) is not needed at the Avard transfer station because there are no land disposal or miscellaneous disposal units at the facility. However, the insurance policies maintained by CHLM cover numerous facilities throughout the United States, including Avard, and the policies include coverage for non-sudden accidental occurrences (see attached certificate).