

TABLE OF CONTENTS

General Facility Information 68

Intent and Purpose 69

Internal Emergency Notification Process 69

Identification of Hazardous Materials 69

 Control Procedures 72

 Fires/Explosion 72

 Spills. 75

Post-Emergency Equipment Maintenance 76

Coordination Agreements 77

Contingency Plan Revisions/Amendments 77

Figure 1: Site Location Map 70

Figure 2: ABC Facility Emergency Equipment Locations 71

Figure 3: ABC Facility Evacuation Plan 74

Exhibit 1: Waste Characteristics Table 78

Exhibit 2: Emergency Response Coordinators 79

Exhibit 3: Emergency Telephone List 80

Exhibit 4: Reporting Form for Emergency Events 81

Exhibit 5: Emergency Report 82

Exhibit 6: Emergency Equipment 83

Exhibit 7: Emergency Response Contingency Plan Distribution 85

Exhibit 8: Distribution Letter 86

ABC FACILITY HAZARDOUS WASTE CONTINGENCY PLAN

General Facility Information

The scope of this Contingency Plan for the ABC Facility includes a less than 90-day drum accumulation area. The information contained herein is submitted in accordance with OAC rules [3745-65-50 to 3745-65-56](#).

The address of the ABC Facility is:

**ABC Facility
123 Blank Road
Cleveland, Ohio 44____.**

The property consists of approximately four acres with two separate buildings (A and B) with approximately 87,000 square feet under roof. Operations at the site started in 1975 and the facility currently employs 50 people. This facility produces sponges for commercial and residential use. **Figure 1** provides the location of the ABC facility.

Manufacturing processes at the ABC Facility, located in Building B, include taking cellulose pulp paper and mixing it with caustic, sodium sulfite and carbon (for bubble texture) to make sponges. Repair operations to the manufacturing equipment occur in the manufacturing areas. Hazardous wastes generated from the manufacturing and repair operations include waste which is hazardous due to ignitability, corrosivity, toxicity and/or it is a listed hazardous waste **Exhibit 1** provides a detailed list of all hazardous waste generated at the ABC Facility.

Hazardous wastes are collected in drums that, when full, are placed in the less-than-90-day accumulation area. The drum accumulation area is located inside the northwest corner of Building B (**Figure 2**). Several of the waste streams are collected in satellite accumulation areas throughout the manufacturing process and within the main repair operations area. The location of these satellite areas are noted on **Figure 2** and the specific types of wastes accumulated in each satellite area are noted in **Exhibit 1**.

The ABC Facility is considered a large quantity generator.

Site Contact:

**Mr. John Doe
123 Blank Road
Cleveland, Ohio 44____.
216-xxx-xxxx**

Intent and Purpose

The following contingency plan has been prepared for the ABC Facility. The purpose of this plan is to protect the safety and welfare of the employees and community in the event of an emergency incident and to comply with federal and state laws pertaining to hazardous waste generators with respect to preparedness and prevention for emergency events.

The contingency plan is intended as a guide of emergency procedures in the event of fire, explosion, spill or release of hazardous waste. This document is also intended as a reference source to familiarize local emergency response agencies, fire and police departments and area hospitals on operations relating to hazardous materials/wastes and emergency response at the ABC Facility.

Internal Emergency Notification Process

In the event of an emergency involving hazardous waste or hazardous constituents at the ABC Facility, the employee first identifying the incident will sound the facility emergency alarm and contact the emergency coordinator listed in **Exhibit 2**. The primary emergency coordinator will be contacted first. If he is not available, an alternate emergency coordinator should be called in the order listed.

Note: If the facility is using a communication device which does not directly contact the emergency coordinator, then facility employees must be trained to notify the emergency coordinator immediately if the specific alarm is sounded.

The emergency coordinators have been selected based on their familiarity with the ABC Facility, the contingency plan, operation and activities at the facility, the location and characteristics of the wastes handled, the location of records within the facility, and the facility layout. Emergency coordinators have been supplied a pager, two-way radio, and/or portable cellular phone for notification purposes.

All emergency coordinators have authority to commit any and all necessary resources of the company to carry out the contingency plan in the event of an emergency. **Exhibit 3**, "Emergency Telephone List", provides telephone numbers for organizations (police, fire, etc.) that may be contacted by the emergency coordinator in the event of an emergency.

Identification of Hazardous Materials

The hazardous waste being stored is hazardous due to ignitability, corrosivity, toxicity and/or it is a listed hazardous waste. **Exhibit 1** provides a detailed list of all hazardous wastes generated at the ABC Facility. In the event of a fire/explosion and/or spill, the source will be identified visually to determine:

- the character of the released material;
- the exact source of the released material; and
- the amount of the released material.

If needed, the emergency coordinator will also refer to facility records and employee reports.

Once the material is identified, control measures will be implemented.

FIGURE 1

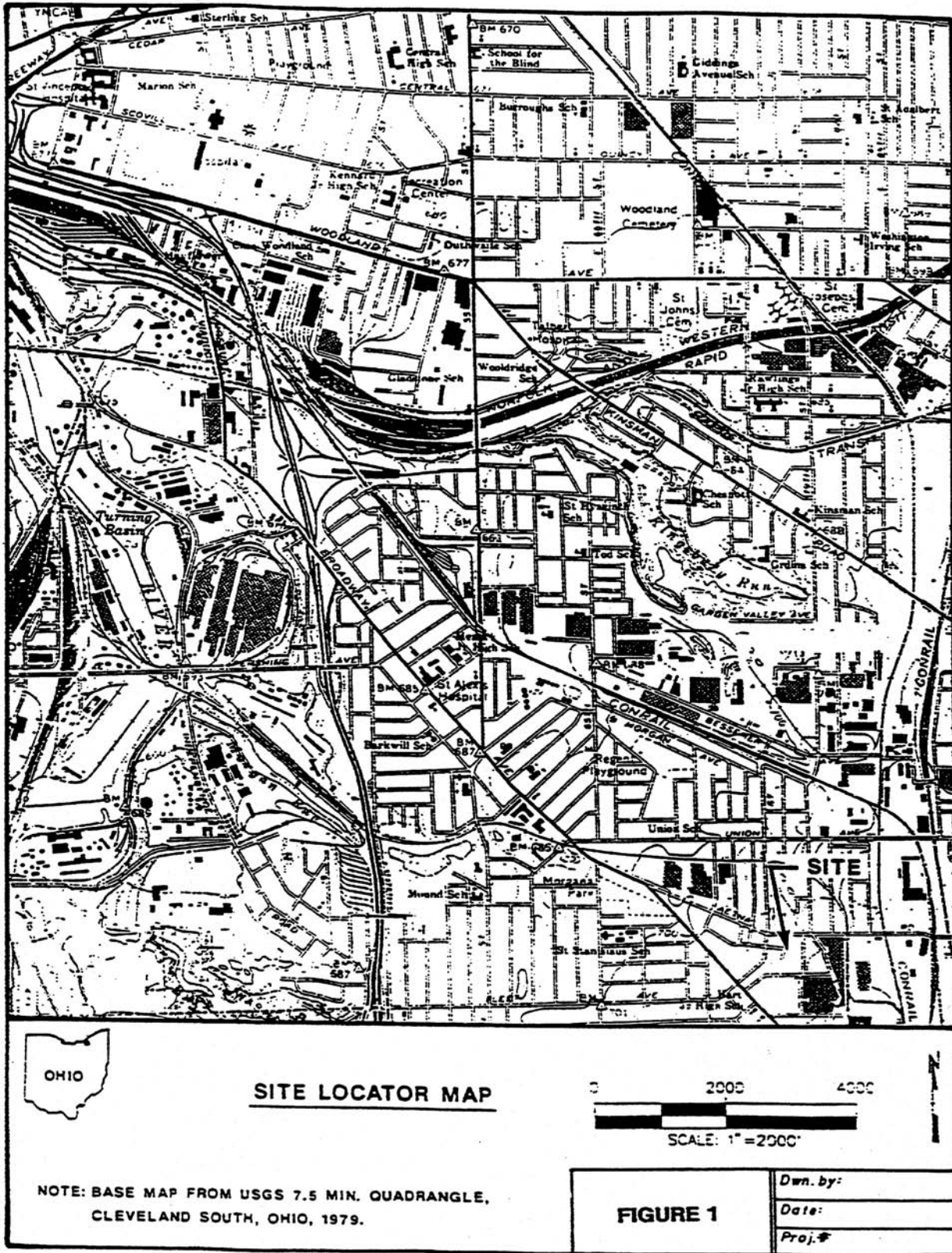
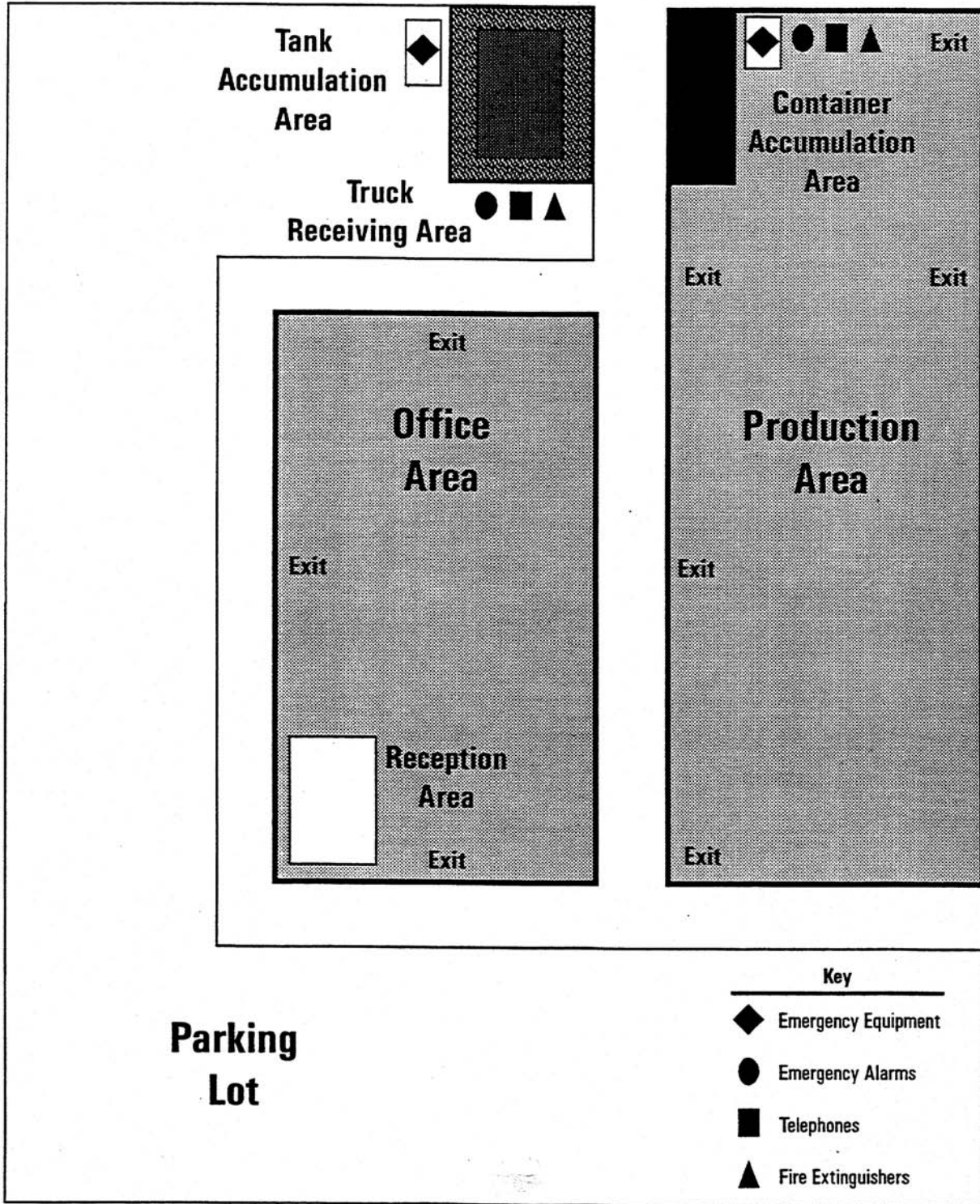


FIGURE 2

ABC Facility Emergency Equipment Locations



Control Procedures [OAC rule [3745-65-52](#)]

This contingency plan will be implemented in the event of a spill of hazardous waste, fire, any explosion, or a combination of these. Additionally, the contingency plan will be implemented if the emergency coordinator determines that a threat to human health or the environment exists. Implementation of this contingency plan is intended to mitigate or protect the facility and neighboring community from injury; contamination of storm sewers with hazardous materials; damage to equipment; damage to the environment; or a combination of these.

This section of the contingency plan addresses control procedures relative to hazardous waste emergency episodes within the container accumulation area:

Container Accumulation Area: The hazardous waste container accumulation area is located within the Northwest corner of Building B. Due to the accumulation of ignitable hazardous waste, the area is located greater than 50 feet from the property line. The area can potentially store 1,500 gallons. The largest container is 55 gallons. This area consists of a concrete pad with a three-inch berm for secondary containment, and a collection sump.

The concrete has been sealed with a chemically resistant sealer which is reapplied per the manufacturer's specifications. Documentation of this maintenance is kept on file at the facility.

Drums of each waste stream are placed in separate designated aisles in the accumulation area on wooden pallets. Drummed materials may be stacked two high, if necessary. A minimum of two (2) feet is maintained as aisle space between the pallets. All drums are placed on the pallets so that the hazardous waste labels can be seen. The emergency equipment is located in a cabinet which is secured with a tear-away tag. The contents and capabilities of the equipment in the cabinet are noted in [Exhibit 6](#). The location of the cabinet as well as the communication device and fire extinguishers are noted on [Figure 2](#).

Control Procedures: Fire/Explosion [OAC rule [3745-65-52](#)]

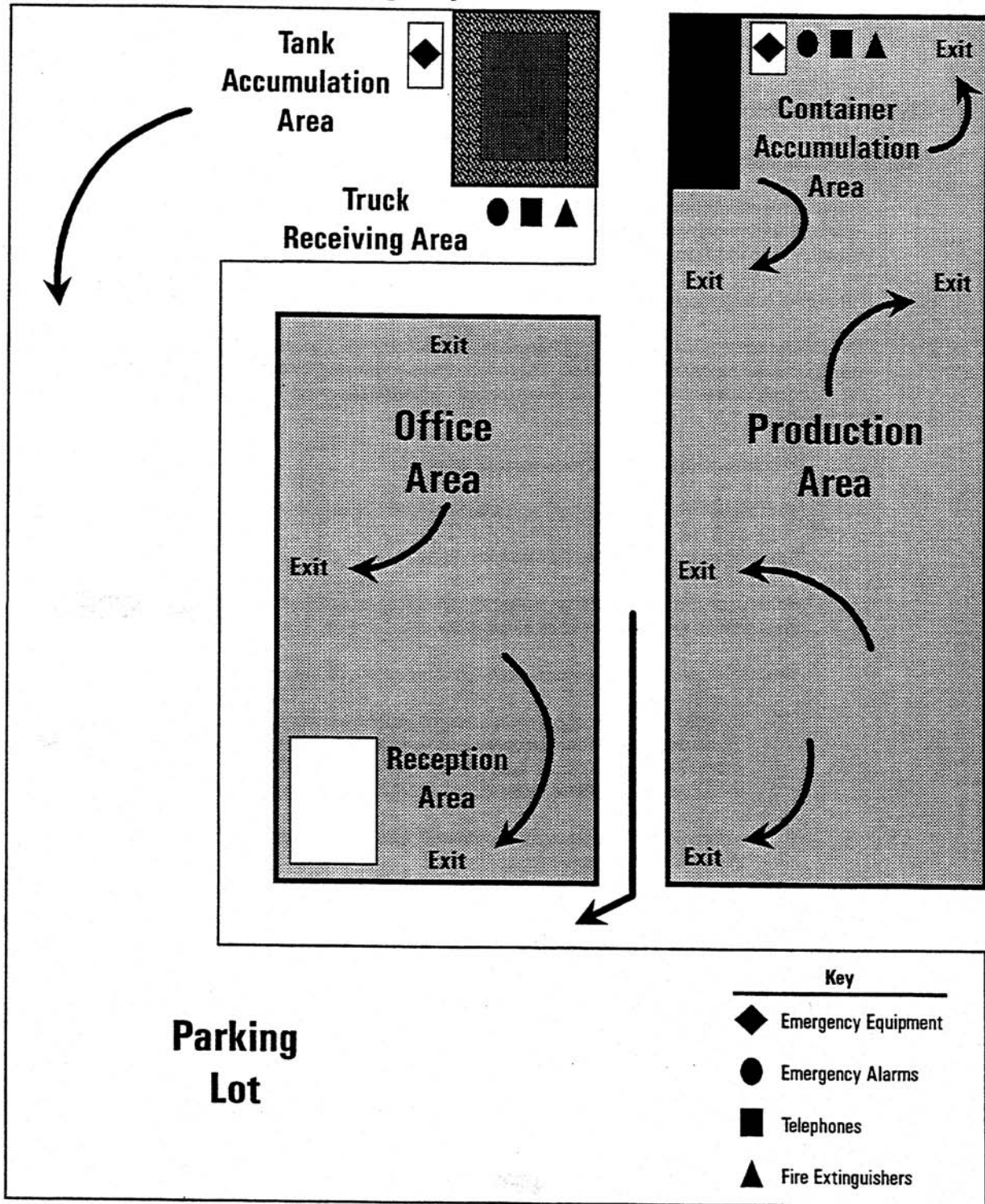
The following actions will be taken if the container accumulation area is affected by fire or explosion:

1. The facility emergency alarm is sounded either from pull boxes located in the container accumulation area, or by telephone or internal communication to the main office. Work in all areas will be shut down until the area is safely restored.
 2. The emergency coordinator will be contacted.
- » In the event of a fire:
- a. If the employee has had the appropriate training, the employee may use nearby fire fighting equipment to provide early containment of the fire to significantly reduce the total damage.

HOWEVER, FIRE FIGHTING ACTIVITIES THAT MAY CAUSE INJURY TO THE PERSONS INVOLVED SHOULD NOT BE PERFORMED.

- b. If ABC personnel cannot safely and effectively perform corrective action in the event of a fire and/or explosion, the emergency coordinator must:
 - i. Assess possible hazards to human health and the environment that may result from the fire and/or explosion. This includes:
 - A. Person(s) injured and seriousness of injury.
 - B. Location of any spill or leak, material involved, and source.
 - » Type of material that has spilled, is leaking and/or is involved in the fire/explosion.
 - » The approximate amount of material spilled, an estimate of the liquid discharge rate and the direction of the liquid flow.
 - ii. Contact the local fire department and other emergency response organizations as listed under **Exhibit 3**.
3. Operating equipment will be shut down as necessary and practical.
4. If the emergency coordinator determines that an area or site evacuation is required, the appropriate person must be notified to sound the proper alarm. The evacuation plans are shown on **Figure 3**.
5. All injured persons will be removed and medical treatment will be administered by trained personnel.
6. During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur, or spread to other hazardous material/waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing and isolating applicable containers.
7. The emergency coordinator must evaluate the facility's emergency equipment to determine if ABC personnel can handle the corrective action and clean-up. A list of the emergency equipment is found under **Exhibit 6**.
8. If ABC personnel can safely and effectively perform corrective action and clean-up, the following steps are to be taken under the authorization of the emergency coordinator (ONLY AFTER THE RESPONSE PERSONNEL PUT ON THE APPROPRIATE PROTECTIVE CLOTHING):
 - a. Eliminate all possible sources of ignition.
 - b. Clean up the released/affected media from the fire or explosion per the spill control procedures listed on page x.
9. For fires and explosions, the emergency coordinator must make the necessary reports as outlined in **Exhibits 4 and 5**.

ABC Facility Emergency Evacuation Plans



Control Procedures: Spills [OAC rule [3745-65-52](#)]

The following actions will be taken in response to a spill of hazardous material:

1. The facility emergency alarm is sounded either from pull boxes, or by telephone or internal communication to the main office. Work in all areas will be shut down until the area is safely restored.
2. The emergency coordinator will be contacted.
3. The emergency coordinator must immediately identify the character, exact source, and extent of any released materials. This information must be obtained without entering the contaminated area. The Emergency Coordinator will obtain the following information:
 - a. Person(s) injured and seriousness of injury.
 - b. Location of the spill or leak, material involved, and source.
 - c. Type of material that has spilled or is leaking.
 - d. The approximate amount of material spilled, an estimate of the liquid discharge rate and the direction of the liquid flow.
4. Emergency response employees will only respond to chemical incidents where proper chemical identification and concentrations can be determined.
5. The emergency coordinator must evaluate the facility's emergency response equipment to determine if ABC personnel can handle the corrective action and clean-up. A list of the emergency response equipment is found under **Exhibit 6**.
6. For small spills: If ABC personnel can safely and effectively perform corrective action and clean-up, the following steps are to be taken under the authorization of the emergency coordinator (ONLY AFTER THE RESPONSE PERSONNEL PUT ON THE APPROPRIATE PROTECTIVE CLOTHING):
 - a. Immediately set up a barrier to alert unauthorized personnel to keep out, if evacuation has not occurred.
 - b. Eliminate all possible sources of ignition and leakage.
 - c. Immediately begin containment by placing absorbent material on the spill within the secondary containment.
 - d. Set up decontamination zone to ensure proper decontamination procedures.
 - e. Use shovels and/or heavy equipment available at the facility to place contaminated absorbent into open top D.O.T. approved drums.

Appendix 3

- f. Any drummed cleanup materials are to be managed as hazardous waste until proper analysis has shown otherwise.
 - g. Drums of cleanup material are to be properly labeled.
 - h. Assigned personnel are to continue to cleanup and remove all residue until all contamination hazards are eliminated.
7. For large spills: If ABC personnel cannot safely and effectively perform corrective action in the event of a spill, the emergency coordinator must:
- a. Assess possible hazards to human health and the environment that may result from the spill.
 - b. Contact the local fire department and other emergency response organizations as listed under **Exhibit 3**.
8. During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires and explosions and releases do not occur, recur, or spread to other hazardous material waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing and isolating containers.
9. For small or large spills, the emergency coordinator must make the necessary reports as outlined in **Exhibits 4 and 5**.
10. After cleanup has occurred, the emergency coordinator must ensure that, in the affected area of the facility:
- a. No waste may be incompatible with the released material stored.
 - b. All emergency equipment listed in the emergency response contingency plan is cleaned and fit for its intended use before resuming operations.
 - c. All disposable equipment used during the incident is replaced with new equipment in the appropriate area.

Post-Emergency Equipment Maintenance [OAC rule [3745-65-56](#)]

Immediately after an emergency event requiring the implementation of the contingency plan, all emergency equipment utilized will be inspected for proper function, completeness and condition. The equipment used for spill clean-up will be documented on the emergency report form (see **Exhibit 5**). The equipment will be evaluated for hazardous characteristics, decontaminated, or properly disposed of in containers. Decontamination procedures include a pressurized water rinse, scrubbing equipment with brushes and water-compatible solvent cleaning solutions or steam cleaning. If the equipment remains contaminated, additional decontamination efforts will be completed. Contamination will be determined through visual observation and sampling, if necessary (see **Exhibit 5**).

Rinseates from equipment decontamination will be collected in containers. The rinseates which contacted hazardous waste and resulting residue will be managed as hazardous waste unless laboratory results indicate otherwise. Other rinseates will be managed in accordance with all applicable laws.

Processes which generate hazardous wastes that were affected must not be resumed until the equipment has been properly decontaminated and has been checked for proper operation.

Coordination Agreements [OAC rule [3745-65-52](#)]

The contingency plan promotes routine contact with the area police and fire departments and hospitals. **Exhibit 7** provides a list of contacts for the contingency plan distribution. **Exhibit 8** provides a sample distribution letter that accompanies the Contingency Plan distribution.

NOTE: Copies of all letters and the certified mail receipts should be kept in the contingency plan as an attachemnt to the document that the facility attempted to comply with this regulatory requirement.

The [local] fire station is the responding authority in the event of a fire at the ABC facility. The fire department makes periodic inspections of the ABC facility and is apprised of facility arrangements. The fire department has full authority as soon as they arrive at the site. The ABC facility utilizes the [local] hospital whenever medical emergencies occur.

The ABC facility has submitted under SARA Title III, emergency and hazardous chemical inventory forms to the local, county and state agencies. The [local] police department is the responding authority should their services be needed at the ABC facility. In addition, the State of Ohio Highway Patrol is aware of the associated activities at the ABC facility.

Contingency Plan Revisions/Amendments [OAC rule [3745-65-54](#)]

This plan must be reviewed and immediately amended, if necessary whenever:

1. applicable rules are changed;
2. the plan fails in an emergency;
3. facility changes in DESIGN, CONSTRUCTION, OPERATION, MAINTENANCE PRACTICES or OTHER CIRCUMSTANCES in a way that increases the potential for fires, explosions or releases of hazardous wastes or hazardous constituents or changes the response necessary in an emergency;
4. the emergency coordinator list changes; or
5. the emergency equipment list changes.

Exhibit 1

ABC Facility Contingency Plan

Hazardous Waste Table

Waste	EPA Codes	Satellite Location	Description
Sulfuric acid	D002	A	Process waste
Sodium hydroxide	D002	B	Process waste
Carbon disulfide	D002	C	Process waste
Sodium hypochlorite	D002	D	Process waste
Chromium	D007	E	Process waste
Xylene	F003, D001	not applicable	Maintenance waste
Methyl ethyl ketone	F003, D035, D001	not applicable	Maintenance waste

Other wastes accumulated in the less than 90 day area:

Universal Waste - Batteries in closed 5-gallon plastic buckets

Used oil in 55-gallon steel drums

Universal Waste - Lamps in the cardboard containers supplied by the recycler

Universal Waste - Thermostats in closed 5-gallon plastic buckets

Exhibit 2

ABC Facility Emergency Response Contingency Plan

Emergency Response Coordinators

Emergency Coordinator	Telephone Numbers	Location
<u>PRIMARY</u>		
(1) John Doe 123 Red Drive Euclid, OH 44____.	Business: 216-xxx-xxxx ext-zzzz Residence: 440-xxx-xxxx Pager: 440-xxx-xxxx	Cleveland Euclid
<u>SECONDARY</u>		
(2) Joe Doe 456 Blue Road Mentor, OH 44____.	Business: 216-xxx-xxxx ext-zzzz Residence: 440-xxx-xxxx Pager: 216-xxx-xxxx	Cleveland Mentor
(3) Jane Doe 789 Green Avenue Parma, OH 44____.	Business: 216-xxx-xxxx ext-zzzz Residence: 440-xxx-xxxx Pager: 440-xxx-xxxx	Cleveland Parma

Exhibit 3

ABC Facility Emergency Response Contingency Plan

Emergency Telephone List

Police Department

Cleveland Police	911 or xxx-xxx-xxxx
Cuyahoga County Sheriff	xxx-xxx-xxxx
Ohio State Highway Patrol	xxx-xxx-xxxx

Fire Department

Cleveland Fire Department	911 or xxx-xxx-xxxx
---------------------------	---------------------

Hospitals

Local Hospital	xxx-xxx-xxxx
Emergency Room	xxx-xxx-xxxx

Other Emergency Services

Ambulance Service	xxx-xxx-xxx
U.S. Coast Guard (Cleveland)	xxx-xxx-xxxx
U.S. Coast Guard (National Response Center)	xxx-xxx-xxxx
Ohio EPA (Emergency Response)	1-800-282-9378
Ohio EPA (District Office)	xxx-xxx-xxxx
County Health Dept	xxx-xxx-xxxx
Local Sewer District	xxx-xxx-xxxx
Electric Company	xxx-xxx-xxxx
Gas Company	xxx-xxx-xxxx

Exhibit 4

ABC Facility Emergency Response Contingency Plan

Reporting Form for Emergency Events

Name, address, and telephone number of owner or operator

Name, address, and telephone number of facility

Date, time, and type of incident (e.g. fire, explosion, etc.)

Name and quantity of material(s) involved

Extent of injuries (if any)

Assessment of actual or potential hazards to human health or the environment (if applicable)

Estimated quantity and dispositions of material recovered from the incident

Send To:

1. (Name) _____
U.S. EPA, Region V
Regional Administrator (EPA)
Chicago, IL 60604
2. Chief
Environmental Emergency Branch
U.S. EPA, Region V
3. Director
Ohio EPA
Lazarus Government Building
P.O. Box 1049
Columbus, OH 43216-1049

Exhibit 5

ABC Facility Emergency Response Contingency Plan

Emergency Report Incident No. _____

1. Type of emergency: Fire _____, Spill _____, Other _____
2. Alarm: Date _____, Time _____, Shift _____
3. Alarm sounded: Yes, No, By _____
4. Location of emergency _____
5. Description of emergency and property involved _____

6. Materials involved and their hazards _____

7. Cause of emergency _____
8. If fire, source of ignition _____
9. Narrative account of fire/spill control measures _____

10. Extinguishing agents used (itemize) _____
11. List other equipment used _____

12. All clear announced by _____
13. Alarm station reset _____
14. Emergency equipment restored to operating condition _____

15. Recommendations and remarks _____

16. Report Submitted By _____, Title _____

Exhibit 6

ABC Facility Emergency Response Contingency Plan

Emergency Equipment

Personnel Protective Equipment

<u>Personnel Protective Equipment</u>	<u>Capabilities of Equipment</u>
● Disposable coveralls	***
● Gloves (inner & outer)	***
● Goggles	***
● Face shields	***
● Hard Hats	***
● Ear protection	***
● Duct tape	***
● Air purifying respirators	***
● Disposable air purifying respirator cartridges	***
● SCBA (includes full oxygen tank)	***
● Boots	***
● Fire blanket	***
● Assorted first aid supplies	***
● Safety showers and eye washes	***

Fire Response Equipment

● Sprinkler system (A local alarm will sound when the sprinklers activate; alarms will also sound in the Fire Station and the ABC Facility offices).	***
● Fire extinguishers	***

Spill Response Equipment

● Sorbent booms, pads & pillows	***
● Squeegees, brooms, buckets, mops	***
● Spark-proof shovels	***
● Sorbent sand	***
● Speedi-dry	***
● Acid neutralizing materials	***
● Base neutralizing materials	***
● Empty 55-gallon open head drums	***
● 85-gallon disposable (over pack) drums	***
● Drum repair kit	***
● 1.5" diameter, 35 gpm stainless steel air pump	***

Communication Equipment

- Telephones
- Alarm Pull Boxes Connected to Alarm System
- 2-way radios
- Pagers

***** Facility should consult the manufacturer's specifications for capabilities and limitations. The facility should also be aware that several items listed above require specialized training prior to use. This training should be documented. The specific capabilities must be noted in the plan to comply with OAC rule [3745-65-52\(E\)](#).**

Exhibit 7

ABC Facility Emergency Response Contingency Plan

Emergency Response Contingency Plan Distribution

- On-site Personnel
- Local Fire Department
- Local Police Department
- Local Sheriff Department
- Local Hospitals
- Ohio EPA, Emergency Response
- Local Sewer District

Exhibit 8

ABC Facility Hazardous Waste Contingency Plan

Distribution Letter

ABC Facility
123 Blank Road
Cleveland, OH 44____.

June 18, 2005

Certified Mail
Return Receipt Requested

Chief James Doe
Cleveland Police Department
Cleveland, OH 44____.

Dear Chief Doe:

The ABC Facility is a local sponge specialty company that supplies sponges for commercial and residential use. ABC Facility performs its operations in Cleveland, Ohio. As part of these operations, the ABC Facility generates and manages hazardous wastes. The ABC Facility requests your agreement to respond to hazardous waste emergencies at the ABC Facility, as is appropriate for your function, upon request by ABC Facility personnel.

Enclosed for your information is a copy of the ABC Facility's Contingency Plan which can be used to familiarize your emergency response personnel with the layout of the ABC Facility, properties of hazardous wastes handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes.

Please respond to this request in writing. A self-addressed stamped envelope is also enclosed for your use.

If you should have any questions, please call me at 216-xxx-xxxx.

Sincerely,

The ABC Facility
Mr. John Doe
Primary Emergency Coordinator

Print/Type Name

Signature

Title

Date