

#### 4.4 Preparedness and Prevention

Ref: 40 CFR Part 270.28  
40 CFR Part 270.14(b)(6)

Facilities must be 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.

Post closure facilities may request a waiver of the preparedness and prevention requirements. GCD is not seeking a waiver of all the requirements.

##### Equipment Requirements

The facility has equipment on site to adequately deal with most routine occurrences including inspections, visual monitoring, mowing, minor fence repairs, and minor grass fires. Outside contractors or emergency responders (as appropriate) may be used for activities such as groundwater monitoring, heavy mowing, severe erosion control, or larger fires.

##### Aisle Space Requirements

Aisle space for emergency vehicles is not applicable due to the nature of the waste and the form of containment. Given that the closed impoundment does not contain liquids or combustible materials, the conditions stipulated in 40 CFR Part 264.35 for required aisle space do not apply to GCD's post closure activities. Specifically, spills, fires and decontamination are highly unlikely scenarios at a closed impoundment containing solidified inorganic contaminants. Even the unlikely event of a grass fire in the vicinity of the closed impoundment would not cause the threat of post closure escape of hazardous constituents.

For these reasons, GCD requested a waiver of the aisle space requirements in a Term 2 NOD response to the DEQ dated June 2, 2004. That waiver request was granted in DEQ's response (line item 10) dated August 2, 2004.

GCD does, however, provide ample *non-emergency* access for maintenance contractors and site personnel performing inspections and monitoring duties.

##### Preventive Procedures

The closed surface Impoundment is fenced to prevent access to the site, in addition to other security measures described in Section 4.2.

The closed Impoundment is visually inspected on a periodic basis. Discrepancies are to be remedied or corrected in a timely manner. Inspection Plan details are provided in Section 4.3.

The groundwater is monitored on an annual basis as described in the *Groundwater Protection* section, Section 4.9, of this permit application.

#### Runoff

The closed surface Impoundment is shaped to control run-on and runoff. The final cover is crowned with a minimum 2 feet clay cap covered with a minimum 2 feet topsoil and vegetative cover. The crowned design, depicted in Figure 8, prevents inundation from run-on and inspections ensure continued positive drainage. Runoff from the closed impoundment runs radially off the closure cap of the closed impoundment flowing overland into natural low-lying areas and drainage ditches that provide positive drainage for the entire property. Figures 2 and 4 depict the surface drainage patterns around the closed impoundment. Dense vegetative growth over the closed impoundment provides erosion and sediment control.

#### Water Supply

Water for normal use and emergencies is supplied by the Town of Quapaw. The supply is from three (3) wells capable of producing a total of 1,400 gallons per minute. The storage in town is 70,000 gallons. Surrounding industrial facilities are fed through two (2) eight (8) inch lines and a six (6) inch line from the storage facility. In the surrounding area, water can be provided in excess of 1,000 gallons per minute at a sustained pressure of sixty (60) pounds for an eight (8) hour duration.

#### Equipment and Power Failure

The facility does not have emergency generators to provide power for electric facilities during power interruptions. Regardless, the closed impoundment is not affected by power outages.

#### Personnel Protective Equipment (PPE)

Protective equipment is available to all GCD employees as needed. Independent contractors, such as those performing groundwater monitoring, are responsible for providing their own PPE. Equipment required during the post closure period may include:

- Fire hydrants (provided by others)
- Portable fire extinguishers
- First aid supplies
- PPE such as Tyvek® and gloves
- Means of communications

These supplies are maintained by GCD.

Prevention of Reaction of Ignitable, Reactive, and Incompatible Wastes

No reactive, ignitable, or incompatible hazardous wastes were or are stored at the closed impoundment.

Arrangements with Local Authorities

GCD has made efforts to familiarize local fire, police, hospitals, and ambulance services with the facility location, operation and potential contingencies that may occur at the facility. This includes authorities in the towns of Quapaw, Baxter Springs, and Miami.

Contact numbers are as follows:

Baptist Regional Health Center	(918) 542-6611
Baxter Springs Ambulance	(620) 856-2561
Baxter Springs Fire Department	(620) 856-3536
Baxter Springs Police	(620) 856-2112
Miami Fire Department	(918) 542-6685
Miami Police Department	(918) 542-5585
Quapaw EMS	(918) 674-2443
Quapaw Fire Department	(918) 674-2710
Quapaw Police	(918) 674-2516

Training

GCD managers are primarily responsible for post closure activities. Groundwater monitoring is normally subcontracted. Any employee or contractor working on the post closure facility with the potential exposure to hazardous wastes or waste constituents will have annual OSHA Hazardous Waste Operations training covering topics such as RCRA, proper waste handling, exposure, hazardous communications, and spill prevention. In all case, work required by the post closure activities will be conducted by qualified and trained individuals.

*GCD believes these preparedness and prevention measures fulfill the intent and technical requirements of 40 CFR Parts 264 Subpart C.*