**TULSA DISPOSAL, LLC**

**TULSA, OKLAHOMA**

**TAB IX**

**CONTINGENCY PLAN**

In Compliance With

40 CFR 270.14 (b) (7)

Revised October 2015

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9.0 - CONTINGENCY PLAN

ODEQ Item Number B-7

40 CFR 270.14(b)(7)

Tab IX provides contingency and emergency response information for Tulsa Disposal, LLC (the Facility) as required by 40 CFR 270.14(b)(7). This Contingency Plan will be included with the Final Renewal Permit for the Facility, but is also intended to serve as a stand-alone document for use by emergency responders.

# GENERAL

This Contingency Plan was prepared based on current conditions at the Facility. Current conditions consist of the Corrective Measure approved by the Oklahoma Department of Environmental Quality (ODEQ) on October 13, 1998, and that is currently operating at the Facility. The Corrective Measure activities include groundwater recovery system operation and monitoring and are part of the Facility’s approved Resource Conservation and Recovery Act (RCRA) corrective action. The Corrective Measure was implemented to prevent further migration of contaminants, and to limit the threat to human health and the environment.

As described in Tab VI, all waste handling at the Facility ceased in June 1996. With the exception of the Corrective Measure, all waste processing and handling equipment was removed as outlined in Appendix 3, Attachment 4.

## Name and Address of Facility

The name and address of the Facility is:

Tulsa Disposal, LLC

5354 West 46th Street South

Tulsa, Oklahoma 74107.

## Facility Type

The Facility is an inactive waste handling facility with an ongoing corrective action program under RCRA.

## Current Owner and Operator

Tulsa Disposal, LLC

42 Longwater Drive

Norwell, Massachusetts 02061

## Corrective Action Status

The approved Corrective Measure consists of one containment trench along the north and west perimeter of the Facility and one recovery trench near the VOC source area at SWMU 1. The groundwater extraction trenches were completed on July 2, 1996, as an Interim Measure and began operating on October 9, 1996. A description of corrective measures is included in Tab XIII of the Application.

As part of the Corrective Measure, semi-annual monitoring is conducted at the Facility. The groundwater and Corrective-measure monitoring consists of measuring flow volumes from the two groundwater extraction trenches, measuring groundwater levels, collecting groundwater samples, analyzing groundwater samples for VOCs and operation and maintenance of the system.

Impacted groundwater recovered from the containment and recovery trenches and generated during semi-annual groundwater sampling events is temporarily stored on site in one 500,000-gallon storage tank. The groundwater is treated through the carbon adsorption system and batch-discharged to the Publicly Owned Treatment Works facility.

## Hazardous Spill History

In August 1991, Hydrocarbon Recycling Inc. notified the Oklahoma State Department of Health (OSDH) of a potential release from the Solvent Plant formerly located at the Facility. Information regarding this potential release and subsequent investigations is discussed in the RCRA Facility Investigation report (October 1994). Insofar as is known, no other reportable hazardous spills have occurred at the Facility.

## Emergency Response Authorization

The Facility Contact (identified in Appendix 1, Table 1) shall act as the primary Emergency Response Coordinator (ERC). In the event that the ERC is unavailable, the persons listed in Table 1 shall assume the duties of the ERC (in the order listed). The ERC has full authority to act on the Facility’s behalf in responding to any emergency at the site.

Appendix 1, Table 2 presents a list of agencies and agency contacts to be notified in the event of an emergency requiring a response as described below.

## Security

Current security at the Tulsa Facility consists of a six-foot-high perimeter chain link fence. Gates are securely locked and checked during inspections as scheduled and described in Tab VIII.

# ANTICIPATED EMERGENCIES

Based on the current corrective actions at the Tulsa Facility, the following will be considered potential emergencies and/or a threat to human health and the environment.

1. Violent storms;
2. Fire;
3. Leaks from the 500,000-gallon groundwater recovery holding tank and associated piping; and
4. Human contact with impacted groundwater.

# INCIDENT PREVENTION

## Violent Storms

Violent storms include tornadoes and thunderstorms with lightening. The following measures will be implemented to prevent harm to individuals at the Facility:

1. Weather forecasts will be monitored by personnel working at the Facility for severe storm warnings issued by the National Weather Service (NWS); and
2. In the event of a storm warning or observed violent weather, personnel working at the Facility will seek shelter in a place of safety.

For tornadoes, there is no structurally secure place of safety at the Facility; consequently, if a funnel cloud is observed or a tornado warning is issued, personnel will evacuate and secure the site.

## Fire

The following fundamental and appropriate precautions for fire prevention will be maintained when personnel are on site:

1. Smoking is prohibited; ‘No Smoking’ signs are prominently posted where required;
2. Non-sparking tools and grounding of electrical units will be used during corrective activities;
3. All electrical components within the plant conform to the National Electric Code (1981) and are installed and maintained in a safe manner; and
4. Fire fighting equipment includes hand held fire extinguishers located throughout the site as well as in buildings. Water for fire fighting is available from three city hydrants on the east side of the plant (Appendix 2, Figure 5).

## Leak Prevention

The potential for leaks at the Facility is estimated to be low. One 500,000-gallon holding tank used as storage for recovered groundwater is maintained on site. The following measures will be used to prevent leaks from the tank and/or associated piping.

1. The tank and associated piping will be examined routinely in accordance with the General Inspection Schedule (Tab VIII) for punctures, cracks, and overall external condition;
2. If a problem is encountered during the tank examination, maintenance will be performed immediately;
3. The 500,000-gallon-tank is double-walled, which provides secondary containment; and
4. Tank water levels are monitored by personnel during routine inspections and corrective action activities.

## Human Contact with Impacted Groundwater

To minimize the potential for personnel to come in contact with impacted groundwater, the following measures will be adhered to:

1. All personnel will be properly trained in sampling techniques and operation and maintenance as they relate to corrective action activities on site. This will be done as outlined in the Waste Analysis Plan (Tab VII)or Sampling and Analysis Plan (Appendix 3, Attachment 3);
2. All sampling personnel will have completed the 40-Hour Health and Safety Course in accordance with 29 CFR 1910.120; and
3. Appropriate Personal Protective Equipment (to be determined by the on-site Field Manager) will be worn by personnel during corrective action activities.

# EQUIPMENT

## Warning Signs

ODEQ and RCRA regulations require that Warning Signs be posted at each entrance of the Facility. These signs read “Warning - Unauthorized Personnel Keep Out”.

## Emergency and Safety Equipment

Safety equipment and basic first aid supplies as determined by the ERC will be brought on site by personnel conducting site inspections and semi-annual corrective action activities such as groundwater sampling. Should an injury occur, the immediate well-being of the injured party is the prime consideration. Emergency phone numbers and the route to the nearest hospital will be available on site. Emergency phone numbers and directions to the nearest hospital are included in Appendix 1, Table 2, and a map in Appendix 2, Figure 6.

# EMERGENCY PROCEDURES FOR ANTICIPATED EVENTS

## Violent Storms

In the event of inclement weather, any personnel on site will adhere to the following procedures.

1. Personnel on site will take shelter immediately in a place of safety. For tornadoes, this means evacuating and securing the Facility. For thunderstorms, a vehicle is the appropriate place of safety;
2. If necessary and time allows, the proper local authorities will be contacted;
3. The acting ERC, Site Supervisor, and appropriate emergency personnel should be contacted following the weather event if damage or human injury occurs;
4. Following the weather event, the ERC will inspect the Facility and the groundwater treatment and recovery system for damage; and
5. In the event of damage, the ERC will prepare a preliminary assessment report describing the damage and outlining a schedule for damage repair. This will be prepared within 24 hours of the event.

## Fires

Should a fire occur at the Facility, the acting ERC and/or the personnel on site will comply with the following procedures:

1. Contact the local Fire Department;
2. Evacuate the Facility; and
3. Contact the ERC and Site Supervisor.

## Leaks

In the event of a leak from the 500,000-gallon holding tank, the ERC or acting ERC and/or personnel on site will be responsible for the following:

1. Take immediate response action to stop flow or release of spilled material;
2. Activate necessary containment procedures using absorbent pads as a dike preventing flow to drains or waterways;
3. Notify Site Supervisor and Emergency Response Coordinator (ERC); and
4. Acquire any additional assistance needed to prevent harm to human-health and the environment.

The ERC or acting ERC is responsible for the activities listed below:

1. Assist in spill control if required;
2. Coordinate cleanup with outside assistance if required;
3. Arrange for disposal of any proper contaminated materials;
4. Notify governmental agencies as required by existing rules and regulations; and
5. Preparing an incident report if required.

## Human Contact with Impacted Groundwater

Should on-site personnel come in contact with impacted groundwater, the personnel will adhere to the following procedures:

1. The area of the body that came in contact with the impacted groundwater will be rinsed thoroughly with deionized water;
2. If appropriate, personnel should seek medical treatment for injuries sustained; and
3. The ERC and Site Supervisor should be contacted.

## Evacuation

The ERC, acting ERC, or most senior person at the Facility will determine if an evacuation is required based on the nature of the emergency. The Facility area should be evacuated in the event of an emergency such as a major fire or a major storm (such as a tornado).

When an evacuation is deemed necessary, all personnel on site will leave the Facility. In the event of violent weather, personnel will seek shelter. The acting ERC will make sure all personnel are accounted for. Additional action after a Facility emergency evacuation will depend on the nature of the emergency.

# MANAGEMENT

## Arrangements with Local Agencies

The Tulsa Fire Department has agreed to respond to an emergency at the site in accordance with its policy for such service to properties outside the city limits. Law enforcement and traffic control will be provided by the Tulsa County Sheriff’s Department. The Sheriff’s Department will limit access to the Facility by blocking West 46th Street during an emergency. Other agency assistance may be coordinated through the Tulsa Area Emergency Management Agency (LEPC). The appropriate local agencies (Appendix 2, Table 2) will be given a current copy of this Emergency Response Plan.

The Concentra Urgent Care – Town West minor emergency clinic, located at 5682 West Skelly Drive, will be used for medical services in the event of a medical emergency. Concentra Urgent Care - Town West will receive one copy of this Emergency Response Plan.

In the event that an ERC is not present, the operator or operator-helper (Acting ERC) shall have full authority to call upon the Fire Department, Sheriff’s Department, or any other emergency agency for assistance.

## Distribution of the Contingency Plan

One copy of this contingency plan will be maintained in the plant office at all times; all designated ERC’s will have a copy. Copies of the plan will be provided to LEPC, the City of Tulsa Fire Department, the Tulsa City-County Health Department, the Tulsa County Sheriff’s office and a local emergency care center.

## Plan Update and Review

The plan will be updated when:

* The facility changes its design, construction, operation, maintenance or other circumstances that potentially change the response necessary in an emergency.
* The list of emergency coordinators changes.
* The plan fails in an emergency.

Revisions to the plan will be initiated immediately upon updating. Appropriate authorities will be notified of the revisions and assumed acceptable unless a written response of objection is received.