designed to extinguish or confine the spread and area of exposure of a fire. The systems may consist of fire hydrants, overhead sprinkler systems, or other types of fire protection systems. A description of the fire protection equipment at Clean Harbors Kansas, LLC is included in Section H, Contingency Plan.

G-4a(5) Testing and Maintenance of Equipment 40 CFR 270.14 (b), 264.33(b)

The facility fire hydrants are tested annually for water flow and pressure. All hydrants are inspected to ensure they are available for emergency use and are not covered by dirt or other foreign material. All hoses and equipment are inspected for integrity and readiness.

Emergency eyewashes, showers, fire extinguishers, sumps, spill kits, alarms, and other emergency equipment are inspected regularly. The inspection criteria and frequencies are outlined in the Inspection Plan in Attachment 3. If problems are found, the corrective action procedures outlined in the Inspection Plan will be implemented.

All equipment will be maintained as necessary to assure its proper operation in time of emergency.

G-4b Aisle Space Requirement: 40 CFR 264.35

Container Management Unit (CMU)s will have access aisles maintained to allow hand held and portable emergency response equipment to be moved. Adequate aisle space is maintained to allow unobstructed movement of personnel, fire protection equipment, or spill control equipment; and is ensured by regular inspections, per the inspection schedule in Section F, Inspection Plan. Container management areas will have a minimum aisle space of two (2) feet as described in Section D.

.

G-4c Documentation of Arrangements with Local Authorities 40 CFR 270.14(b), 264.37

In the event of an emergency which may require notification of outside authorities, the ERC or person designated by the ERC, shall call the appropriate emergency authorities; the KDHE will be notified within 24 hours or in as timely a manner as is possible of any events that result in implementation of this Emergency/Contingency Plan.

A telephone listing of these authorities is provided in Appendix G-B, Emergency Telephone List of Local Authorities. This telephone list will be posted at or nearby every telephone in the active portion of the facility; emergency telephone numbers are also available in office areas. The person initiating the call will provide as much of the following information as is available.

Clean Harbors Kansas, LLC has made arrangements with Wichita Police/Fire Departments, Emergency Services and the Local Emergency Planning Commission to ensure that they are familiar with facility operations. Each agency has been provided a copy of the facility Contingency Plan and are provided with periodic updates as the Plan changes.

Attachment G-B contains the emergency contact phone numbers of local officials. Attachment G-C contains the coordination agreement letters that CHK has provided to local officials and emergency services agencies.

G-5 Preventive Procedures, Structures, and Equipment: 40 CFR 270.14(b)(8)

Various structures have been constructed, safety features have been incorporated, and operating procedures have been developed, to minimize hazards to human health and the environment. Procedures, equipment, and structures utilized to prevent hazards are described in the following sections.

- A description of the Container Management Units is provided in Section D, Use and Management of Containers.

- A list of emergency equipment and a description of the emergency procedures are provided in the Contingency /Emergency Plan, Section H; a copy of this plan will be available at the facility at all times.

- Additional information regarding operating procedures are described in Section C, Waste Characterization, Section F, Inspection Plan, and Section I, Training Program.

Appropriate material handling equipment and devices will be employed in the waste management areas. Applicable safeguards will be observed during repairs performed near ignitable materials (e.g., no smoking, no sparks, no open flames, etc.). Special precautions will be taken to prevent accidental ignition of ignitable wastes or the uncontrolled mixing of incompatible wastes (Refer to G-6 of this section).

G-5a <u>Loading and Unloading Operations:</u> 40 CFR 270.14(b)(8)(i)

Facility operations personnel receive training on proper loading and unloading procedures. This training will include instruction on machinery operation, safety equipment, waste identification, and processing procedures. A description of the personnel training plan (e.g., job-specific training) is provided in Section I, Training Program.

Various structures and equipment are utilized during loading and unloading operations to

prevent environmental and health hazards. Container Management procedures are detailed in Section D, Use and Management of Containers. Standard loading/unloading procedures are described below.

- Bulk Liquid Wastes: Prior to loading or unloading a bulk liquid container (e.g., a tanker truck) the operator will visually check valve position, that hoses are secured, and that any needed hose connection plugs and caps are in place. Following the loading or unloading of a bulk liquid container, the operator will visually check valve position, and that any needed hose connection plugs and caps are in place. Bulk metal containers holding ignitable liquid wastes will be grounded and bonded prior to loading or unloading.

- Containerized Wastes: Elevated docks are provided to facilitate loading and unloading of containerized wastes at the Drum Dock, and at Building J. Trucks are loaded or unloaded using an industrial truck or a drum dolly, or other appropriate container handling equipment. Containers are typically fifty-five (55) gallon drums, although larger and smaller containers may also be handled.

Manual handling of the containers will be minimized. Industrial trucks are capable of lifting and transporting one or more containers at a time. Drum grapplers (e.g., a semi-circular shaped arm attachment to the forks) or fork attachments for the forklift truck will be used for

lifting and transporting individual containers. These drum grasping attachments are capable of securely holding a container during lifting and transporting without requiring additional straps or hooks. The operator is responsible for ensuring that the truck and the dock or ramp are properly aligned before any loading or unloading activities are initiated.

Drum dollies may be used to move individual containers (typically drums). The dollies have forks or a plate that can be inserted beneath the bottom of an individual container to support the container during lifting and transporting. The dollies either have a clip to secure the top of the container, or are shaped in an arc to cradle the container during lifting and transport.

These drum dollies have features capable of holding a container during lifting and transporting without requiring additional straps. Some manual handling of the containers may be necessary.

G-5b <u>Run-off and Run-on:</u> 40 CFR 270.14(b)(8)(ii)

Precipitation and spills in waste management areas will be contained by dedicated secondary containment structures. These structures will prevent run-off to the environment or other facility areas. Secondary containment systems may contain one or more sumps to allow collection and removal of any accumulated liquids. Accumulated liquids will be managed in accordance with Section C, Waste Characterization. Containment systems not protected from

precipitation by a building have been designed to accommodate the intrusion of precipitation from a twenty-five (25) year, twenty-four (24) hour storm event. Drawings showing the design and dimensions of containment systems are provided in Sections D, Use and Management of Containers, of this permit application.

Precipitation falling outside of the containment areas is controlled to prevent run-on of storm water into a waste management unit. Storm water falling into the active areas of the site is managed through a storm water drainage system. Spills of hazardous waste will be promptly controlled and removed, when discovered, to prevent the spread of contaminants. Spill response procedures are provided in Section H, Contingency/Emergency Plan. The spilled material and any absorbent used will be placed into appropriate containers. The waste will be managed in accordance with Section C, Waste Characterization.

G-5c <u>Water Supplies:</u> 40 CFR 270.14(b)(8)(iii)

Operations at CHK will require water for potable and process usage. Water supplies include City of Wichita water as well as ground water available on site. City (potable) water will be used for personnel decontamination (e.g., eye-wash stations, safety showers, and sanitary needs).

Process water is used for waste treatment, equipment decontamination, fire fighting, etc. The process water will be supplied either from the City of Wichita distribution system or from ground water at the facility. Potable and process water are distributed, as needed, throughout the facility. Physical separation will be used to prevent contamination of the water in a delivery system by back-siphoning of contaminants.

G-5d Equipment and Power Failure: 40 CFR 270.14(b)(8)(iv)

Normally, the electrical requirements of CHK will be met with power purchased from the local power utility. There are no processes involving high pressures or reactions that, as a result of a power outage, might "run away" and cause fires, explosions, or other sudden releases of hazardous waste.

In the event of a power outage, facility personnel will proceed as follows.

- Cease operations
- Switch off process equipment
- Close appropriate valves
- Report to their supervisor(s) for further instructions

G-5e <u>Personal Protective Equipment:</u> 40 CFR 270.14(b)(8)(v)

Personal Protective Equipment (PPE) available at the facility will include the following.

- Self-Contained Breathing Apparatus (SCBA): A portable device to supply breathing air will be available on-site.

- Cartridge respirator: Employees will be issued the appropriate mask and cartridges for the work area. Cartridges for the masks will be stocked at the facility.

- Protective clothing: Employees performing specific tasks in HWMUs will be issued hard hats, protective coveralls, safety glasses, chemical resistant steel toe boots, specialized gloves, and hearing protection as appropriate. A supply of the appropriate protective clothing will be maintained at the facility.

Minimum PPE for all personnel within the active portion of the facility is a hard hat and eye protection. This minimum protection level will not apply to personnel within passenger vehicles, the administration building, control rooms, or any other office space within the facility in which the risk of a head or eye injury does not exceed normal office work risks. Personnel within specific waste management units will be provided with a hard hat, eye protection, and chemical resistant boots. Additional PPE will be provided as required for

specific tasks.

Employees will be trained in proper PPE decontamination during their introductory training.

G-5f <u>Prevention of Releases to Atmosphere:</u> 40 CFR 270.14(b)(8)(vi)

The facility is designed, constructed, maintained, and operated to minimize the possibility of 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 as required by 40 CFR 264.31.

The facility Inspection Plan (Section F), Emergency/Contingency Plan (Section H), and Training Plan (Section I) have been developed to enable the facility to prevent releases including emissions and to respond to any releases that may occur.

Waste management practices designed to minimize potential releases to the atmosphere include procedures as specified in 40 CFR 264.173. Containers remain closed during storage, except when it is necessary to add or remove waste or sample the container. Containerized hazardous waste is managed in a manner that minimizes the potential for rupture of containers or damage to containers which could result in leakage. Ramps and automated transfer equipment facilitate safe movement of waste between management areas.

Container unit management practices are designed to comply with the requirements of 40 CFR Subpart I – Use and Management of Containers. Materials are not intentionally placed in a container management unit if they could cause a release to the atmosphere as the result of a spill, leak or reaction with the contents of another container within close proximity. All spills and other releases from containers held within a container management unit will be removed and/or cleaned up at the earliest practicable time to minimize potential for release to atmosphere by evaporation.

G-6 Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes:

G-6a Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste and Mixing of Incompatible Wastes: 40 CFR 264.17(a), 270.14(b)(9)

Precautions will be taken at the facility during storage, treatment, or handling to avoid the accidental ignition or reaction of waste and mixing of incompatible wastes. These precautions are intended to prevent generation of undesirable heat, pressure, fire, explosion, toxic gases, or fumes which could result in damage to the structural integrity of any portion of the facility or cause a threat to human health or the environment.

Ignitable waste will be protected from open ignition sources such as open flames, metal welding and cutting, hot surfaces, frictional heat, spontaneous ignition (e.g., heat producing

sparks) will be observed during repairs performed near ignitable materials.

Buildings which enclose waste processing operations will be ventilated appropriately to avoid an accumulation of hazardous mists, vapors, dusts, or gases; or of flammable vapors or gases.

G-6b Management of Ignitable or Reactive Wastes in Containers: 40 CFR 264.176, 270.15(c)

Ignitable or reactive wastes in containers may be either solid, sludge, or liquid. Ignitable or reactive wastes in containers will be managed at CHK in a manner that minimizes the possibility of a fire or reaction.

Containers holding ignitable or reactive waste are kept closed at all times except when adding or removing waste or during sampling. Keeping the containers closed in this manner prevents the escape of potentially ignitable fumes that could find a remote ignition source. When it is necessary to conduct a transfer operation, the source and destination container, as well as the transfer device, will be properly grounded to prevent the generation of static electric charge.

Knowledge of the identity and characteristics of potentially ignitable and reactive wastes is key to preventing fire or unanticipated reactions. The information collected on the Waste Material Profile, Attachment G-D, will be used to determine if a particular waste stream is reactive so

chemical reactions), radiant heat, smoking, and sparks (static, electrical, or mechanical). Company policy prohibits the use of an open flame in areas where waste management occurs without issuance of a "Hot Work Permit." Smoking is allowed only in designated areas away from all waste management areas.

Activities generating flames or sparks, such as welding or cutting, in areas where waste management occurs, are permitted only after a "Hot Work Permit" has been issued. The permit is not granted until the area has been inspected, the work area tested for flammable vapors, and all ignitable wastes have been properly removed or protected. Flammable vapor concentrations in the air are determined through the use of a portable or stationary LEL (lower explosive limit) meter.

Grounding equipment is provided to dissipate any accumulation of static charges generated by the movement of liquids. The principles of static grounding and the hazards of flammable liquids are thoroughly explained to all operating personnel during their safety training program. Bulk metal containers (tank trailers and transport tanks) of ignitable liquid wastes will be grounded and bonded before and during transfer of material through pipes or hoses. Drums of ignitable liquid wastes will be grounded and bonded before and during transfer of material between containers. Signs prohibiting smoking will be conspicuously placed within and near the ignitable waste storage areas. Applicable safeguards (e.g., no smoking, no

that appropriate storage and handling decisions can be made. Ignitable or reactive wastes are protected from spontaneous ignition caused by heat-producing chemical reactions by segregating incompatible wastes within the Container Management Building. Segregated secondary containment will prevent mixing of incompatible wastes.

The buildings have been designed to comply with the City Building Code and the appropriate codes of the National Fire Protection Association (NFPA). Interior and exterior walls of the Container Management Building meet the requirements of the applicable Building Code and NFPA codes. Equipment and personnel access doors meet the applicable codes. All containers in the Container Management Building that hold ignitable or reactive wastes are maintained a minimum of 50 feet from the facility property line.

G-6c Management of Incompatible Wastes in Containers: 40 CFR 264.177, 270.15(d)

Clean Harbors Kansas, LLC employs a number of protective measures to prevent the inadvertent mixing or commingling of incompatible wastes in containers. Incompatibility between wastes or a waste and a container will be determined in accordance with Section C, Waste Characterization. No containerized wastes will be mixed with other containerized wastes until it is determined that the wastes are compatible. The compatibility testing is outlined in the Waste Analysis Plan.

Containers of waste received within one truck trailer will be unloaded and managed as described in Section C, Waste Characterization. If, during incoming load analysis, incompatible wastes in a common CMU are identified, the containers holding the incompatible waste will be removed and placed in an appropriate area or provided with a portable containment system. Section D, Use and Management of Containers provides a description of the container storage and processing procedures. Containers of incompatible materials will not be placed in the same containment area, unless one of the incompatible materials is placed on an isolation pallet or is otherwise isolated from the other material. These procedures will minimize the possibility of mixing of the incompatible materials should leaks develop in the containers holding the materials.

Wastes found to be incompatible under the procedures in Section C will not be placed in the same container. Wastes will only be added to containers that are shown to be compatible with the materials of construction of the container.

APPENDIX G-A

SAMPLE INSPECTION LOG SHEETS

Form May be Modified

CleanHarbors ENVIRONMENTAL SERVICES

CONTAINER STORAGE AREA INSPECTION FORM

FormCode COCMPFRM03

Full Name:		**Date:**	5/7/2008
Location:	Bldg xxxx	**Military Time:**	

Instructions: Note condition of inspection items. If item does not apply to an area, mark N/A. All unsatisfactory findings must be explained below. Include any repairs, changes or other remedial actions required or performed.

INSPECTION ITEM	YES	NO	N/A	REASON FOR FAILURE	WORK TICKET STAT
Container Placement and Stacking	●	○	○		
Sealing of Containers	●	○	○		
Labeling of Containers	●	○	○		
Containers	●	○	○		
Pallets	●	○	○		
Doors (indoor area)	●	○	○		
Base / Foundation / Roof	●	○	○		
Berms / Racks	●	○	○		
Debris and Refuse	●	○	○		
Warning Signs	●	○	○		

Aisle Space	◉	○	○		
Loading and Unloading Areas	◉	○	○		
Sumps	◉	○	○		
Alarm and Communication System	◉	○	○		
Storage Capacity	◉	○	○		
Bonding / Grounding	◉	○	○		
Pumps	◉	○	○		
Inventory Age	◉	○	○		
On-Demand Work Ticket (please describe reason below)					
Select Overall Assessment of Inspection Results	Pass				

Submit

Supervisor's Signature _____

SAFETY & SECURITY INSPECTION FORM

FormCode COCMPFRM01

Full Name:		**Date:**	5/7/2008
Location:	Wichita	**Military Time:**	

Instructions: Note condition of inspection items. If item does not apply to an area, mark N/A. All unsatisfactory findings must be explained below. Include any repairs, changes or other remedial actions required or performed.

INSPECTION ITEM	YES	NO	N/A	REASON FOR FAILURE	WORK TICKET STAT
Perimeter Fences	●	○	○		
Gates	●	○	○		
Warning Signs	●	○	○		
Exit Signs	●	○	○		
Exits / Firelanes / Evacuation Routes Clear?	●	○	○		
Lighting System	●	○	○		
Emergency Lighting System	●	○	○		
Accessibility of Safety Equipment/Protective Gear (helmets, faceshields,goggles,boots,gloves,clothing,duct tape, ab. pads)	●	○	○		
Adequate Supply of Safety Equipment/Protective Gear	●	○	○		
Condition of Safety Equipment/Protective Gear	●	○	○		

Breathing Apparatus Accessibility	◉	◯	◯		
Breathing Apparatus Adequate Supply/Full Charge	◉	◯	◯		
Breathing Apparatus Condition	◉	◯	◯		
First Aid Kits	◉	◯	◯		
Blood Borne Pathogen Kits	◉	◯	◯		
Emergency Eyewashes	◉	◯	◯		
Emergency Showers	◉	◯	◯		
Internal/External Communications (Phones/Radios)	◉	◯	◯		
Fire Extinguishers	◉	◯	◯		
Absorbent Supply	◉	◯	◯		
Recovery Drum Supply	◉	◯	◯		
Respirators and Cartridges	◉	◯	◯		
Fire Suppression System (monitors, pull stations, alarms) Accessibility	◉	◯	◯		
Fire Suppression System Operable?	◉	◯	◯		

Water Lines / Hydrants	◉	◯	◯		
Alarm Systems	◉	◯	◯		
Fire Blankets	◉	◯	◯		
Strainers on Fire Suppression System	◉	◯	◯		
Surveillance System/Guard Service	◉	◯	◯		
Supplied Air Delivery System and Reserve	◉	◯	◯		
Wind Sock	◉	◯	◯		
Decontamination Equipment	◉	◯	◯		
Portable Sump Pumps	◉	◯	◯		
Gasoline Pumps	◉	◯	◯		
Loud Speakers	◉	◯	◯		
Chocked Wheels on Parked Vehicles	◉	◯	◯		
Cylinders Secure	◉	◯	◯		
Ventilation Operable	◉	◯	◯		

Fall Protection	●	○	○		
Electrical Boxes	●	○	○		
Emergency Contact Info Posted	●	○	○		
Hearing Protection Available	●	○	○		
Housekeeping	●	○	○		
Portable Compressor	●	○	○		
Lime Supply	●	○	○		
QC Lab Hood	●	○	○		
Rolloff Parking Area	●	○	○		
Dumpster / Outside Contianers	●	○	○		
Stormwater Collection System	●	○	○		
Rally Point	●	○	○		
Visitors Log	●	○	○		
Contingency Plan	●	○	○		

Wind Instrument	◉	○	○		
On-Demand Work Ticket (please describe reason below)					
Select Overall Assessment of Inspection Results	Pass				

Submit

Supervisor's Signature _____

Appendix G-B

Emergency Telephone Listing of Local Authorities

Emergency Telephone Listing of Local Authorities

Clean Harbors Kansas, LLC
2549 North New York Avenue
Wichita, Kansas, 67219

Office Telephone No.: 316-269-7400

Agency	Office Telephone	Emergency Telephone
Sedgwick Co. EMS	316/383-7994	911
St. Francis Emergency Center	316/268-5052	316/268-5052
Wichita Fire Dept.	316/268-4451	911
WFD HazMat Team	316/838-8655	911
Wichita Police Dept.	316/268-4239	911
KDHE	785/296-1079	785/296-0614
EPA Region VII	913/281-0991	913/281-0991
National Response Center (NRC)	800/424-8802	800/424-8802
Derby Refinery After 5:00 PM	316/262-5703	316/267-1981
Union Pacific	316/268-9433	316/268-9433

Appendix G-C

Coordination Agreement Letters

Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

May 16, 2012

Via Christ Emergency Services
929 N. St. Francis Street
Wichita, KS 67214

Certified mail number 7008 1830 0003 3581 6872

RE: Facility Contingency/Emergency Plan
Clean Harbors of Kansas LLC
EPA ID # KSD007246846

Dear Emergency Responder,

The Clean Harbors of Wichita Contingency Plan has been modified as part of the ongoing Part B permit renewal.

Please replace your present copy of the Clean Harbors of Wichita Contingency Plan with this version.

Please complete and return the attached Facility Contingency /Emergency Acknowledgement letter plan in the self addressed envelope included in this mailing.

If, after review of the information presented, you have any questions please feel free to contact Mr. Brian Key at 316-269-7400 or myself at 513-681-6242 ext. 6364.

Respectfully submitted

Stephen Bley
Regulatory Compliance Manager

Cc: File
Brian Key

Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

May 16, 2012

Clean Harbors of Wichita
2549 North New York Ave.
Wichita, KS 67219

Certified mail number 7008 1830 0003 3581 6865

RE: Facility Contingency/Emergency Plan Acknowledgement letter

This letter is to acknowledge receipt of the updated Facility Contingency/Emergency Plan by the Via Christ Emergency Services.

_____

Signature of recipient Date

_____

Name of recipient and title

Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

May 16, 2012

City of Wichita Police Department
455 N. Main Street
Wichita, KS 67202

Certified mail number 7008 1830 0003 3581 6858

RE: Facility Contingency/Emergency Plan
Clean Harbors of Kansas LLC
EPA ID # KSD007246846

Dear Emergency Responder,

The Clean Harbors of Wichita Contingency Plan has been modified as part of the ongoing Part B permit renewal.

Please replace your present copy of the Clean Harbors of Wichita Contingency Plan with this version.

Please complete and return the attached Facility Contingency /Emergency Acknowledgement letter plan in the self addressed envelope included in this mailing.

If, after review of the information presented, you have any questions please feel free to contact Mr. Brian Key at 316-269-7400 or myself at 513-681-6242 ext. 6364.

Respectfully submitted

Stephen Bley
Regulatory Compliance Manager

Cc: File
Brian Key

Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

May 16, 2012

Clean Harbors of Wichita
2549 North New York Ave.
Wichita, KS 67219

Certified mail number 7008 1830 0003 3581 6841

RE: Facility Contingency/Emergency Plan Acknowledgement letter

This letter is to acknowledge receipt of the updated Facility Contingency/Emergency Plan by the City of Wichita Police Department.

_____

Signature of recipient Date

_____

Name of recipient and title

Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

May 16, 2012

Sedgwick County Emergency Medical Services
PO BOX 607
Wichita, KS 67201

Certified mail number 7008 1830 0003 3581 6834

RE: Facility Contingency/Emergency Plan
Clean Harbors of Kansas LLC
EPA ID # KSD007246846

Dear Emergency Responder,

The Clean Harbors of Wichita Contingency Plan has been modified as part of the ongoing Part B permit renewal.

Please replace your present copy of the Clean Harbors of Wichita Contingency Plan with this version.

Please complete and return the attached Facility Contingency /Emergency Acknowledgement letter plan in the self addressed envelope included in this mailing.

If, after review of the information presented, you have any questions please feel free to contact Mr. Brian Key at 316-269-7400 or myself at 513-681-6242 ext. 6364.

Respectfully submitted

Stephen Bley
Regulatory Compliance Manager

Cc: File
Brian Key

Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

May 16, 2012

Clean Harbors of Wichita
2549 North New York Ave.
Wichita, KS 67219

Certified mail number 7008 1830 0003 3581 6827

RE: Facility Contingency/Emergency Plan Acknowledgement letter

This letter is to acknowledge receipt of the updated Facility Contingency/Emergency Plan by the Sedgwick County Emergency Medical Services.

_____

Signature of recipient Date

_____

Name of recipient and title

Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

May 16,2012

Sedgwick County Local Emergency planning Committee
525 N. Main Street Room B-10
Wichita, KS 67202

Certified mail number 7008 1830 0003 3581 6803

RE: Facility Contingency/Emergency Plan
Clean Harbors of Kansas LLC
EPA ID # KSD007246846

Dear Emergency Responder,

The Clean Harbors of Wichita Contingency Plan has been modified as part of the ongoing Part B permit renewal.

Please replace your present copy of the Clean Harbors of Wichita Contingency Plan with this version.

Please complete and return the attached Facility Contingency /Emergency Acknowledgement letter plan in the self addressed envelope included in this mailing.

If, after review of the information presented, you have any questions please feel free to contact Mr. Brian Key at 316-269-7400 or myself at 513-681-6242 ext. 6364.

Respectfully submitted

Stephen Bley
Regulatory Compliance Manager

Cc: File
Brian Key

Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

May 16, 2012

Clean Harbors of Wichita
2549 North New York Ave.
Wichita, KS 67219

Certified mail number 7008 1830 0003 3581 6827

RE: Facility Contingency/Emergency Plan Acknowledgement letter

This letter is to acknowledge receipt of the updated Facility Contingency/Emergency Plan by the Sedgwick County Emergency planning Committee.

_____

Signature of recipient Date

_____

Name of recipient and title

Appendix G-D

Sample Waste Material Profile

WASTE MATERIAL PROFILE SHEET

Clean Harbors Profile No. CH480725

A. GENERAL INFORMATION

GENERATOR EPA ID #/REGISTRATION # ***MAD999999999*** GENERATOR NAME: ***E Commerce Test Account 1***

GENERATOR CODE (Assigned by Clean Harbors) ***ECOMT1*** CITY ***Braintree*** STATE/PROVINCE ***MA*** ZIP/POSTAL CODE ***02184***

ADDRESS ***1501 Washington Street*** PHONE: **(803) 691-3525**

CUSTOMER CODE (Assigned by Clean Harbors) ***ECOMT1*** CUSTOMER NAME: ***E Commerce Test Account 1***

ADDRESS ***1501 Washington Street*** CITY ***Braintree*** STATE/PROVINCE ***MA*** ZIP/POSTAL CODE ***02184***

B. WASTE DESCRIPTION

WASTE DESCRIPTION:

PROCESS GENERATING WASTE:

IS THIS WASTE CONTAINED IN SMALL PACKAGING CONTAINED WITHIN A LARGER SHIPPING CONTAINER ?

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE
- SOLID WITHOUT FREE LIQUID
- POWDER
- MONOLITHIC SOLID
- LIQUID WITH NO SOLIDS
- LIQUID/SOLID MIXTURE
  - % FREE LIQUID
  - % SETTLED SOLID
  - % TOTAL SUSPENDED SOLID
- SLUDGE
- GAS/AEROSOL

NUMBER OF PHASES/LAYERS

1 2 3

% BY VOLUME (Approx.)

TOP	***0.00***
MIDDLE	***0.00***
BOTTOM	***0.00***

VISCOSITY (If liquid present)
- 1 - 100 (e.g. Water)
- 101 - 500 (e.g. Motor Oil)
- 501 - 10,000 (e.g. Molasses)
- > 10,000

COLOR

ODOR
- NONE
- MILD
- STRONG

Describe:

BOILING POINT °F (°C)
- <= 95 (<=35)
- 95 - 100 (35-38)
- 101 - 129 (38-54)
- >= 130 (>54)

MELTING POINT °F (°C)
- < 140 (<60)
- 140-200 (60-93)
- > 200 (>93)

TOTAL ORGANIC CARBON
- <= 1%
- 1-9%
- >= 10%

FLASH POINT °F (°C)
- < 73 (<23)
- 73 - 100 (23-38)
- 101 -140 (38-60)
- 141 -200 (60-93)
- > 200 (>93)

pH
- <= 2
- 2.1 - 6.9
- 7 (Neutral)
- 7.1 - 12.4
- >= 12.5

SPECIFIC GRAVITY
- < 0.8 (e.g. Gasoline)
- 0.8-1.0 (e.g. Ethanol)
- 1.0 (e.g. Water)
- 1.0-1.2 (e.g. Antifreeze)
- > 1.2 (e.g. Methylene Chloride)

ASH
- < 0.1
- 0.1 - 1.0
- 1.1 - 5.0
- 5.1 - 20.0
- > 20
- Unknown

BTU/LB (MJ/kg)
- < 2,000 (<4.6)
- 2,000-5,000 (4.6-11.6)
- 5,000-10,000 (11.6-23.2)
- > 10,000 (>23.2)

Actual:

D. COMPOSITION (List the complete composition of the waste, include any inert components and/or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL	MIN	–	MAX	UOM

DOES THIS WASTE CONTAIN ANY HEAVY GAUGE METAL DEBRIS OR OTHER LARGE OBJECTS (EX., METAL PLATE OR PIPING >1/4" THICK OR >12" LONG, METAL REINFORCED HOSE >12" LONG, METAL WIRE >12" LONG, METAL VALVES, PIPE FITTINGS, CONCRETE REINFORCING BAR OR PIECES OF CONCRETE >3")?	YES	NO
If yes, describe, including dimensions:		
DOES THIS WASTE CONTAIN ANY METALS IN POWDERED OR OTHER FINELY DIVIDED FORM?	YES	NO
DOES THIS WASTE CONTAIN OR HAS IT CONTACTED ANY OF THE FOLLOWING; ANIMAL WASTES, HUMAN BLOOD, BLOOD PRODUCTS, BODY FLUIDS, MICROBIOLOGICAL WASTE, PATHOLOGICAL WASTE, HUMAN OR ANIMAL DERIVED SERUMS OR PROTEINS OR ANY OTHER POTENTIALLY INFECTIOUS MATERIAL?	YES	NO
I acknowledge that this waste material is neither infectious nor does it contain any organism known to be a threat to human health. This certification is based on my knowledge of the material. Select the answer below that applies:		
The waste was never exposed to potentially infectious material.	YES	NO
Chemical disinfection or some other form of sterilization has been applied to the waste.	YES	NO
I ACKNOWLEDGE THAT THIS PROFILE MEETS THE CLEAN HARBORS BATTERY PACKAGING REQUIREMENTS.	YES	NO
I ACKNOWLEDGE THAT MY FRIABLE ASBESTOS WASTE IS DOUBLE BAGGED AND WETTED.	YES	NO

SPECIFY THE SOURCE CODE ASSOCIATED WITH THE WASTE. SPECIFY THE FORM CODE ASSOCIATED WITH THE WASTE.

CleanHarbors

Clean Harbors Profile No. CH480725

E. CONSTITUENTS

Are these values based on testing or knowledge? Knowledge Testing

If constituent concentrations are based on analytical testing, analysis must be provided. Please attach document(s) using the link on the Submit tab.

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval of your waste profile. Please note that the total regulated metals and other constituents sections require answers.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL	UOM	NOT APPLICABLE
D004	ARSENIC	5.0				
D005	BARIUM	100.0				
D006	CADMIUM	1.0				
D007	CHROMIUM	5.0				
D008	LEAD	5.0				
D009	MERCURY	0.2				
D010	SELENIUM	1.0				
D011	SILVER	5.0				
	VOLATILE COMPOUNDS					
D018	BENZENE	0.5				
D019	CARBON TETRACHLORIDE	0.5				
D021	CHLOROBENZENE	100.0				
D022	CHLOROFORM	6.0				
D028	1,2-DICHLOROETHANE	0.5				
D029	1,1-DICHLOROETHYLENE	0.7				
D035	METHYL ETHYL KETONE	200.0				
D039	TETRACHLOROETHYLENE	0.7				
D040	TRICHLOROETHYLENE	0.5				
D043	VINYL CHLORIDE	0.2				
	SEMI-VOLATILE COMPOUNDS					
D023	o-CRESOL	200.0				
D024	m-CRESOL	200.0				
D025	p-CRESOL	200.0				
D026	CRESOL (TOTAL)	200.0				
D027	1,4-DICHLOROBENZENE	7.5				
D030	2,4-DINITROTOLUENE	0.13				
D032	HEXACHLOROBENZENE	0.13				
D033	HEXACHLOROBUTADIENE	0.5				
D034	HEXACHLOROETHANE	3.0				
D036	NITROBENZENE	2.0				
D037	PENTACHLOROPHENOL	100.0				
D038	PYRIDINE	5.0				
D041	2,4,5-TRICHLOROPHENOL	400.0				
D042	2,4,6-TRICHLOROPHENOL	2.0				
	PESTICIDES AND HERBICIDES					
D012	ENDRIN	0.02				
D013	LINDANE	0.4				
D014	METHOXYCHLOR	10.0				
D015	TOXAPHENE	0.5				
D016	2,4-D	10.0				
D017	2,4,5-TP (SILVEX)	1.0				
D020	CHLORDANE	0.03				
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008				

OTHER CONSTITUENTS	MAX	UOM	NOT APPLICABLE
BROMINE			
CHLORINE			
FLUORINE			
IODINE			
SULFUR			
POTASSIUM			
SODIUM			
AMMONIA			
CYANIDE AMENABLE			
CYANIDE REACTIVE			
CYANIDE TOTAL			
SULFIDE REACTIVE			

HOCs

NONE

< 1000 PPM

>= 1000 PPM

PCBs

NONE

< 50 PPM

>=50 PPM

IF PCBS ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?

YES NO

ADDITIONAL HAZARDS

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES NO (If yes, explain)

CHOOSE ALL THAT APPLY

DEA REGULATED SUBSTANCE	EXPLOSIVE	FUMING	OSHA REGULATED CARCINOGENS
POLYMERIZABLE	RADIOACTIVE	REACTIVE MATERIAL	NONE OF THE ABOVE

CleanHarbors

Clean Harbors Profile No. CH480725

F. REGULATORY STATUS

YES NO USEPA HAZARDOUS WASTE?

YES NO DO ANY STATE WASTE CODES APPLY?

Texas Waste Code

YES NO DO ANY CANADIAN PROVINCIAL WASTE CODES APPLY?

YES NO IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?

LDR CATEGORY:
VARIANCE INFO:

YES NO IS THIS A UNIVERSAL WASTE?

YES NO IS THE GENERATOR OF THE WASTE CLASSIFIED AS CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG)?

YES NO IS THIS MATERIAL GOING TO BE MANAGED AS A RCRA EXEMPT COMMERCIAL PRODUCT, WHICH IS FUEL (40 CFR 261.2 (C)(2)(II))?

YES NO DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

YES NO IS THIS WASTE STREAM SUBJECT TO THE INORGANIC METAL BEARING WASTE PROHIBITION FOUND AT 40 CFR 268.3(C)?

YES NO DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?

YES NO DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?

YES NO DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE > 77 KPA (11.2 PSIA)?

YES NO IS THIS CERCLA REGULATED (SUPERFUND) WASTE ?

YES NO IS THE WASTE SUBJECT TO ONE OF THE FOLLOWING NESHAP RULES?

Hazardous Organic NESHAP (HON) rule (subpart G) Pharmaceuticals production (subpart GGG)

YES NO IF THIS IS A US EPA HAZARDOUS WASTE, DOES THIS WASTE STREAM CONTAIN BENZENE?

YES NO Does the waste stream come from a facility with one of the SIC codes listed under benzene NESHAP or is this waste regulated under the benzene NESHAP rules because the original source of the waste is from a chemical manufacturing, coke by-product recovery, or petroleum refinery process?

YES NO Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) >10 Mg/year?

What is the TAB quantity for your facility? Megagram/year (1 Mg = 2,200 lbs)

The basis for this determination is: Knowledge of the Waste Or Test Data Knowledge Testing

Describe the knowledge :

G. DOT/TDG INFORMATION

DOT/TDG PROPER SHIPPING NAME:

H. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY ONE TIME WEEKLY MONTHLY QUARTERLY YEARLY OTHER

CONTAINERIZED

0-0 CONTAINERS/SHIPMENT

STORAGE CAPACITY:
CONTAINER TYPE:

CUBIC YARD BOX PALLET

TOTE TANK DRUM

OTHER:

DRUM SIZE:

BULK LIQUID

GALLONS/SHIPMENT: ***0 Min -0 Max*** GAL.

BULK SOLID

SHIPMENT UOM: TON YARD

TONS/YARDS/SHIPMENT: ***0 Min - 0 Max***

I. SPECIAL REQUEST

COMMENTS OR REQUESTS:

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE NAME (PRINT) TITLE DATE

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Appendix H-C, Coordination Agreement Letters

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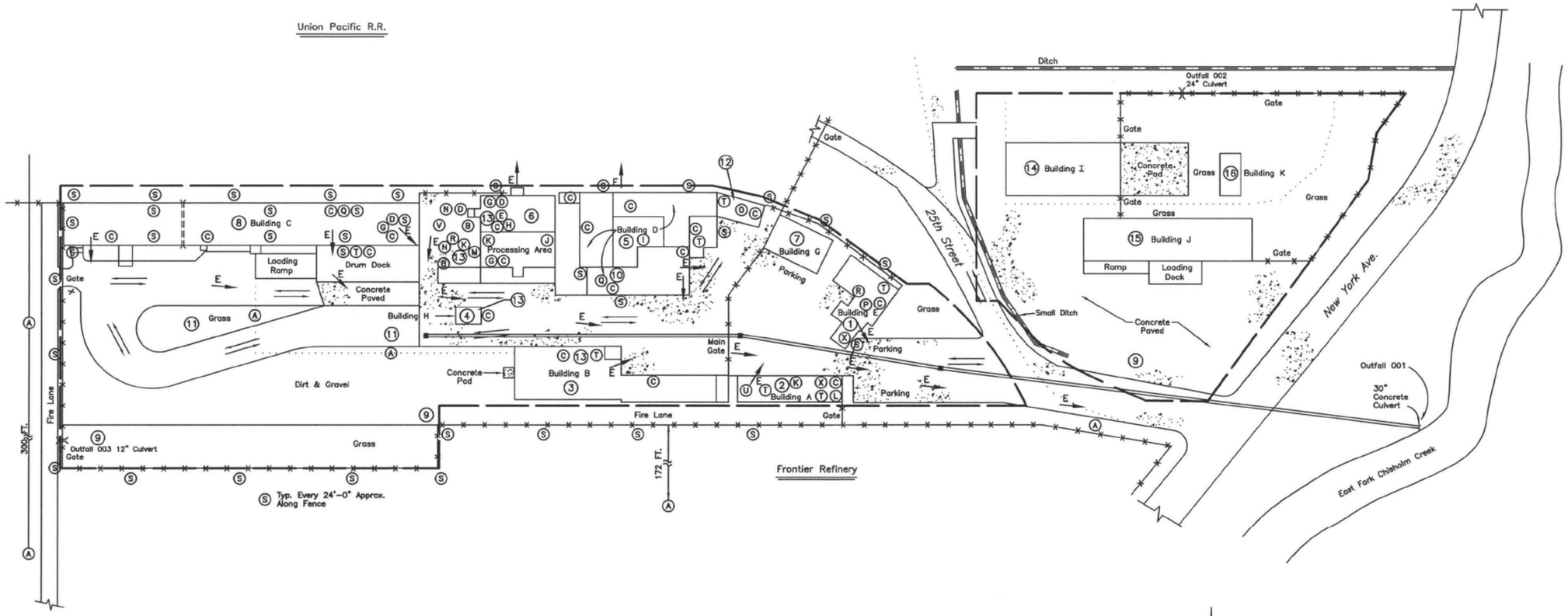
Drawing H-1, Emergency Equipment/Evacuation Routes

Acronym Table

Clean Harbors Kansas, LLC (CHK)
Emergency Response Coordinator (ERC)
City of Wichita Fire Department (CWFD)
Hazardous Materials Response Team (HMRT)
City of Wichita Police Department (CWPD)
National Response Center (NRC)
Reportable Quantity (RQ)
Local Emergency Planning Committee (LEPC)
Kansas Department of Health and Environment (KDHE)
National Fire Protection Association (NFPA)
Personal Protective Equipment (PPE)
Self-Contained Breathing Equipment (SCBA)



Emergency Equipment Legend:

- (A) Fire Hydrant
- (B) Portable 150 Lb. Fire Extinguisher
- (C) Hand-Held Fire Extinguisher
- (D) Emergency Alarm
- (E) Shovel
- (F) Portable P.A. System
- (G) Oil Absorbant
- (H) Empty Drums
- (I) Air Compressor
- (J) Flexible Hose & Quick Cplgs.
- (K) Shower & Eye Wash
- (L) Goggles & Face Shields
- (M) Organic Vapor Masks, SCBA, Body Harness
- (N) Protective Clothes & Boots
- (O) Portable Sump Pump
- (P) First Aid Kit
- (Q) Squeegee
- (R) Hardhats
- (S) No Smoking/Danger Signs
- (T) Telephone
- (U) Foam Equipment
- (V) Vehicles
- (W) Oxygen
- (X) Fire Blanket
- E → Evacuation Route

Building Legend:

1. Administration Offices, Building 'E'
2. Lab/Admin., Building 'A'
3. Building 'B'
4. Operations Office, Building 'H'
5. Building 'D'
6. Process Area
7. Break Room, Building 'G'
8. Hazardous Waste Management, Building 'C'
9. Monitoring Wells
10. Sparging/Hot Room Area
11. Remote Sprinkler Tie In
12. Maintenance
13. Emergency Showers
14. Hazardous Waste Management, Building 'I'
15. Building 'J'
16. Offices, Building 'K'

N

50 0 50 100
SCALE OF FEET

Legend:

- : Railroad Tracks
- : Fence
- : Property Line
- : Secondary Containment Berm or Wall
- : Pavement
- : Drainage Boundary
- : Storm Drain Catch Basins
- : Underground Storm Sewer Line
- : Truck Routes

FIGURE H-1

REV.	DESCRIPTION	DRAWN BY	DATE	APPR. BY
C	RCRA PART B SUBMITTAL UPDATE	K.M.C.	9/3/10	S.A.B.
B	RCRA PART B SUBMITTAL UPDATE	K.M.C.	3/27/09	M.C.
A	RCRA PART B SUBMITTAL	K.M.C.	6/20/08	M.C.

REFERENCE DRAWINGS

CleanHarbors

THIS DRAWING IS THE PROPERTY OF CLEAN HARBORS KANSAS, LLC. ANY INFORMATION CONTAINED THEREON MAY NOT BE COPIED OR USED WITHOUT WRITTEN PERMISSION OF OWNER.

DRAWN	CHECKED	SCALE	DATE
K.M.C.	M.C.	AS NOTED	05/16/08

TITLE
CLEAN HARBORS KANSAS, LLC
WICHITA FACILITY
EMERGENCY EQUIPMENT/EVACUATION ROUTES PLAN

DRAWING NO. WICHFIRE
REV. C

Clean Harbors Kansas, LLC
RCRA Permit Application
Section H
Contingency/Emergency Plan

H-1 Introduction:

This Contingency/Emergency plan, when implemented, will minimize hazards to human health and the environment due to events such as fires, explosions, and/or releases of hazardous waste. This plan contains provisions addressing the requirements of 40 CFR Part 270 and 40 CFR Part 264. It is presented in a format designed to be useful for employees and response personnel during an emergency and for employee training purposes.

Copies of the plan will be kept at the facility and provided to the appropriate local authorities and emergency response agencies that may be called upon to provide emergency services. Amendment of the Emergency/Contingency Plan will be performed in accordance with the permit modification requirements of 40 CFR 270.42. The plan will be reviewed and may be amended, if necessary, whenever:

- the permit is revised;
- the plan may be improved by addressing shortcomings noted during practice or actual implementation;

- the list of Emergency Response Coordinators (ERC) changes, or the list of emergency equipment changes;
- the facility changes in a way that materially increases the potential for fires, explosions, releases of hazardous waste or hazardous waste constituents; or
- the facility changes in a way that affects the implementation of the plan.

H-2 General Information: 40 CFR 264.52, 264.53

H-2a Facility name:

Clean Harbors Kansas, LLC

H-2b Owner and Operator of Facility:

H-2b(1) Facility Operator:

Clean Harbors Kansas, LLC

2549 North New York Avenue

Wichita, Kansas 67219

H-2b(2) Facility Owner(s):

Clean Harbors Kansas, LLC

2549 North New York Avenue

Wichita, Kansas 67219

H-2b(3) **Facility Telephone Number:**

Office: 316/269-7400

Note: See Table H-1 for telephone numbers for Emergency Response Coordinators.

H-2c **Location:**

The facility is located at 2549 North New York Avenue in Wichita, Sedgwick County, Kansas, ZIP code 67219.

This address is in the Northeast quarter of the Southeast quarter of Section 4, Township 27 South, Range 1 East.

H-2d **Layout and Site Plan:**

See Figure H.1, Emergency Equipment/Evacuation Routes, Drawing 50-01-03-002.

Note: Full size reference drawings are available for review from the facility, and are included in Section Y of the Part B permit application, Referenced Drawings.

H-2e Description of Facility Operations:

CHK treats, recovers for recycling, and stores for subsequent off-site disposal, hazardous and nonhazardous wastes. Detailed operating and design descriptions are presented in the facility RCRA Permit Application (Parts A and B), which is available for review at the facility. All RCRA regulated storage areas and treatment equipment will have secondary containment structures, which provide adequate run-on and run-off controls.

Figure H.1. Emergency

H-3 Emergency Response Coordinators: 40 CFR 264.52(d), 264.55

The Emergency Response Coordinator (ERC) will be responsible for implementing the Contingency/Emergency plan as necessary in the event of an exigent situation. Each of the personnel listed in Table H-1, Emergency Response Coordinators, are qualified to assume the responsibilities of ERC. Each ERC will be familiar with all aspects of the facility's Contingency/Emergency Plan, operations and activities at the facility, the location and nature of wastes handled, the location of records within the facility, and the facility layout. An attempt will be made to contact the primary ERC in the event of an exigency; if the primary ERC is not available, the alternate ERC(s) will be called until one is reached.

The personnel listed in Table H-1, Emergency Response Coordinators, have full authority to commit all facility resources necessary to carry out the Contingency/Emergency Plan. A letter providing authorization for action by an ERC is provided in Appendix H-B, Emergency Response Coordinator Authorization.

Table H-1

Emergency Response Coordinators

Primary Emergency Response Coordinator

Brian Key
[redacted]

Ex. 6 PII

Work – 316-269-7418
[redacted]

Alternate Emergency Response Coordinator

John Martin
[redacted]

Ex. 6 PII

Work: 316-269-7498
[redacted]

H-4 Implementation:

This Plan will be implemented in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or waste constituents that may threaten human health and the environment. The ERC will be contacted if a fire, explosion, or release of hazardous waste might warrant implementation of this Plan. The ERC will determine whether implementation of the Contingency/Emergency Plan is necessary. Minor events which do not meet these criteria may be resolved with due regard to personnel health and safety without implementation of this plan. The following types of situations may be justification for implementing this plan.

H-4a Fires and/or Explosions:

- Fire that may cause harm to human health.
- Fire that may cause release of toxic fumes.
- Fire that may spread and could possibly ignite other nearby materials, either on-site or off-site, or could cause heat-induced explosions.
- Use of fire suppressants that could result in contaminated run-off.

- Explosion which has or could:
    - result in danger from flying fragments or shock waves
    - ignite other hazardous waste at the facility
    - release toxic fumes.

H-4b <u>Material Releases:</u>

- A release of toxic vapors or a significant volume of flammable liquids or vapors that could present a fire or vapor explosion hazard.
- A release that could result in off-site soil contamination and/or surface water contamination.
- A release that could endanger human health or the environment for other reasons.

H-5 Emergency Response Procedures:

H-5a Notification Procedures: 40 CFR 264.56(a)(2), 264.56(d)

In the event of an emergency which may require notification of outside authorities, the ERC or person designated by the ERC, shall call the appropriate emergency authorities; the KDHE will be notified within 24 hours or in as timely a manner as is possible of any events that result in implementation of this Emergency/Contingency Plan.

A telephone listing of these authorities is provided in Appendix H-B, Emergency Telephone List of Local Authorities. This telephone list will be posted at or nearby every telephone in the active portion of the facility; emergency telephone numbers are also available in office areas. The person initiating the call will provide as much of the following information as is available.

- Name of caller
- Name of facility and telephone number
- Address and location of Facility
- Time and type of incident
- Type and quantity of material(s) involved

- Extent of injuries
- Possible hazards to health and environment outside the facility

The specific authorities to be notified are as follows.

- The Sedgwick County Emergency Medical Service (EMS) will be called to respond to injuries to personnel as needed. Arrangements to treat personnel injuries have been made with Via Christi (St. Francis) Emergency Center.

- In the event of a fire, explosion, or major spill, the City of Wichita Fire Department (CWFD) will be notified as needed. Arrangements have been made with the CWFD Hazardous Materials Response Team (HMRT); the HMRT is prepared to respond to a fire, explosion, or major spill at the CHK facility.

- Similarly, for situations which may require response from the local police (i.e., evacuation), the City of Wichita Police Department (CWPD) will be notified. If the CWPD officials determine that additional assistance is needed, they may contact the Sedgwick County Sheriff, and/or the Kansas Highway Patrol.

In the event that the ERC determines that the facility has had a release, fire, or explosion which could threaten human health or the environment outside the facility, the appropriate local emergency authorities will be notified. The ERC will be available to assist authorities in evaluating the situation regarding potential evacuation of an area outside of the facility. In addition, the National Response Center (NRC) will be notified in the event of a release of a Reportable Quantity (RQ) within a twenty-four (24) hour period.

If there is evidence of a Section 304 RQ release off site, the Local Emergency Planning Committee (LEPC) will be notified in accordance with said section of the Emergency Planning and Community Right-to-Know Act of 1986 (40 CFR 355).

The Kansas Department of Health and Environment (KDHE) will be notified of incidents through reporting as specified in Section H-9.

H-5b Identification of Hazardous Materials: 40 CFR 264.56(b)

Whenever there is a release, fire, or explosion that may threaten human health or the environment, the ERC will immediately attempt to determine the character, exact source, amount, and areal extent of any released materials. Facility records, manifests, truck placards, etc. may be reviewed or inspected in an effort to identify the waste that may be involved in an exigent situation. A chemical analysis may be performed as necessary.

H-5c Hazard Assessment: 40 CFR 264.56(c)

The ERC will assess possible hazards to human health or the environment that may result from the release, fire or explosion. This assessment will consider both direct and indirect effects of the release, fire, or explosion, including:

- the possible effects of any toxic, irritating, or asphyxiating gases that are generated,

- the possibility of fire spreading to other areas or causing a heat induced explosion,
- the risk to which facility personnel might be exposed by attempting to control a fire or release,
- the effects of any hazardous surface water run-off from water or chemical agents used to fight fires, and
- the potential of contaminating surface water or ground water from a spill or release of hazardous material.

The ERC will utilize available information to make this assessment, including the quantity of hazardous material involved, the rate of release, and the conditions surrounding the incident.

H-5d <u>Control Procedures:</u> 40 CFR 264.52(a), 264.56

In the event of an emergency, the necessary provisions of this Contingency/Emergency plan will be carried out as described below.

The person who first discovers the incident, if it is safe to do so, will:

- evacuate injured personnel,
- Notify the Emergency Response Coordinator,
- stop the spread of contamination (e.g., turn off a valve on a tank),
- begin primary containment of liquids (i.e., dikes, sumps),
- order the evacuation of other personnel from the area surrounding the incident, if necessary.

Once the ERC has been notified and is on the scene, he/she will then assess the situation further with the information that is available at this time. The ERC will immediately implement, as necessary, the following provisions of this Contingency/Emergency Plan (if not previously implemented).

- Activate internal facility alarms or communication systems to notify all facility personnel of the incident.
- Identify the character, exact source, amount, and areal extent of any released material, if possible.

- Assess the possible hazards to human health or the environment. If the assessment indicates that there is a threat to human health or the environment outside the facility, or if there is evidence of a release of a RQ of hazardous material outside the facility, the ERC will implement the notification provisions of this Contingency/Emergency Plan per 40 CFR 264.56(d).
- Coordinate the evacuation of personnel from immediate danger and coordinate first aid for injured personnel.

After the initial assessment is completed, the ERC will also, as necessary, implement the following procedures.

- Coordinate the appropriate response procedures according to the incident. These procedures are presented in H-5e.
- Initiate remedial actions to reduce the impact of the incident, as appropriate.
- Ensure that any waste generated during clean up is properly managed, and that no waste that may be incompatible with the released material is managed at the affected unit until the cleanup procedures are completed.

Additional responses may be warranted depending on the type of incident. The response procedures outlined in H-5e include the items that the ERC will consider in

determining additional responses. This Plan serves as a guide rather than an unyielding set of procedures. The ERC will consider all options presented in this Plan and implement them as appropriate.

H-5e Emergency Response Procedures: 40 CFR 264.56

H-5e(1) Injuries to Personnel:

The following response actions are to be considered in the event that an injury occurs at the facility.

- Based on the assessment of hazards to health which may be present, and if it is safe to do so, evacuate injured personnel from immediate danger using appropriate Personal Protective Equipment (PPE).
- Perform CPR or artificial respiration, if needed, on the injured.
- Notify Sedgwick County EMS according to notification procedures in Section H-5a.
- Wash eyes, skin, etc. of injured personnel with water, if needed.
- Treat injuries (see Figure H.2 for the location of first aid stations).
- Establish emergency operations center.

- Notify emergency operations center of incoming injured.
- Dispatch site personnel to meet and direct incoming emergency vehicles.

H-5e(2) **Fires/Explosions:**

During an emergency, the ERC will take all reasonable measures necessary to ensure that fires and explosions do not occur, recur, or spread to other hazardous waste at the facility.

The following response actions are to be considered if a fire and/or explosion should occur at the facility.

- Establish an emergency operations center.
- Extinguish any fire with fire extinguishers, if appropriate.
- Call the Wichita Fire Department HMRT.
- Evacuate site according to evacuation procedures in H-8.
- Notify Derby refinery and Union Pacific in the event of an evacuation.
- Contact appropriate local agencies (see H-5 for notification procedures). The telephone list is posted at or near telephones or is available in office areas.
- Notify the KDHE.

- Notify the National Response Center (NRC).
- Dispatch site personnel to meet and direct incoming emergency vehicles.
- Use water spray to cool tanks and containers that are exposed to heat as a result of the fire and/or explosion.
- Protect other operations and vehicles from the incident. This includes, where applicable, stopping processes and operations, collecting and containing released wastes, removing or isolating containers, or moving vehicles.
- Monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment.
- Stop the release of liquid by plugging, patching, or unloading any leaking tanks, pipes, or other equipment.
- Absorb liquid waste with absorbent materials and place in containers for management. Alternatively, larger spills can be pumped into containers or tanks.

H-5e(3) **Releases:**

During an emergency, the ERC will take all reasonable measures necessary to ensure that releases do not occur or recur. The following list contains response procedures to be considered in the event that a release of hazardous waste occurs.

- Evacuate immediate area around incident.
- Attempt to contain spills, if it is safe to do so.
- Transfer leaking or ruptured container(s) to an overpack.
- Establish emergency operations center.
- Determine the source of spill/release and shut down the affected unit to eliminate additional material release.
- Stop additional release of material to the environment and control surface leakage (e.g., pump the spilled material to tanks, transfer contents of tank to another tank, build containment dikes, transfer released materials to containers).
- Clean up the spill using on-site equipment. As appropriate, these procedures will include soaking up liquid with absorbants; removal of standing liquids and/or waste from sumps, trenches, or low points of the floor; removal of material adhering to the surface; and steam cleaning and/or a water rinse.
- If on-site personnel cannot contain/cleanup spill, contact appropriate state and local agencies (see Section H-5a for notification procedures).
- Contact the Wichita Fire Department Hazardous Materials Response Team (HMRT) for RQ spills. The telephone lists is posted next to all phones or in all offices in the facility (see Appendix H-B for phone numbers).
- Evacuate the facility (see H-8 for evacuation procedures and routes).

- Within twenty-four (24) hours, or as soon as practicable after detection of the release, transfer sufficient waste from the tank or container, as necessary, to prevent further release of hazardous waste to the environment and to allow inspection of the unit. Any tank system from which there has been a leak or spill, or which is unfit for use, will be emptied and removed from service in accordance with 40 CFR 264.196.
- After the release is controlled, and it is deemed safe to do so, response personnel will enter the affected building or area to assess damage and to determine the condition of waste containers, and other affected equipment.
- Stop the release of liquid into an area by plugging, patching, or unloading any leaking tanks, pipes, or other equipment.
- Stop the release of liquid from its container by placing the leaking container into an overpack drum.

After an emergency, the ERC will initiate clean-up activities including the treatment, storage, and/or disposal of recovered waste, contaminated soil or surface water, or other material that results from a release, fire, or explosion at the facility.

H-5f <u>Post-Emergency Activities:</u> 40 CFR 264.56(h)(2), (i)

When operations of a waste management unit have been suspended due to an emergency resulting in implementation of this Plan, the unit and all equipment that was used in implementing the Plan will be assessed. Emergency equipment used in response to the emergency must be determined to be fit for reuse or replaced. The Regional Administrator (Region VII) and the KDHE will be notified (per 40 CFR 264.56) when the equipment is fit for use, prior to resuming operation of the affected unit.

The following actions will be considered when decontaminating emergency equipment.

- Provide adequate safety equipment and protective clothing for CHK personnel involved in remedial actions.
- After a fire, explosion, or spill event is controlled and it is deemed safe to do so, enter the affected building or area to assess damage and determine the condition of waste containers, tanks, and other affected equipment.
- Utilize on-site equipment for remedial actions (see H-6 for list of on-site equipment).
- The Tanker Bay in the Processing Area may be used to decontaminate vehicles and equipment (i.e., trucks, portable pumps, etc.). The rinsate will be collected and managed as a hazardous waste.

- Reusable PPE will be decontaminated, as appropriate. PPE which is unsuitable for reuse will be managed for disposal.
- Inspect the affected unit(s) and ensure that no waste that is incompatible with the released material is managed in the unit(s) until cleanup procedures are completed. If incompatible waste is discovered near each other, the incompatible waste will be removed to a safe location away from other incompatible wastes.
- If there is a release to a secondary containment system of a tank or tank system that damages the secondary containment system, the secondary containment system will be repaired before the tank(s) are returned to normal operation. If the secondary containment system cannot be repaired, that tank or tank system will have to be closed pursuant to 40 CFR §264.196(e)(1).
- Note in the operating record the time, date, and details of any incident that required implementing the contingency plan.
- Submit, from CHK or the ERC, a written report of the incident to the Secretary within 15 days after the incident (see H-9 for the detailed reporting requirements).
- Submit, from CHK or the ERC, a written report to the Secretary certifying that any emergency equipment involved in the incident or in the response and remediation are fit for their intended use.

H-6 Emergency Equipment:

Emergency equipment is available at the facility for response to emergency situations. Emergency equipment maintained on site is summarized in Table H-2, Emergency Equipment List. This equipment will be accessible and will be regularly inspected and appropriately serviced. A description of this equipment is listed below.

H-6a Emergency Alarm and Communication Systems:

The facility is equipped with emergency alarm and communication systems to be used to notify and give emergency directions to both on-site and off-site personnel. These systems include:

- a facility-wide alarm system (siren), which is capable of alerting personnel of emergencies;
- a PA system which includes an intercom system accessible by telephones throughout the facility; and
- telephones, which are the primary means of communication within the facility and between the facility and the local emergency authorities.

Table H-2

Emergency Equipment List

Equipment	Capabilities
Fire Extinguishers	Small fire control
Foam Supply	Fire control
Portable Sump Pump	Collection of spills/leaks
SCBA/Respirators	Minimize exposure of personnel
Personal Protective Equipment	Minimize exposure of personnel
Air Compressor	Supplied air line
Containers/Overpacks	Storage of collected material
Absorbants	Spill control
Squeegee, Shovel	Spill collection/containment
Portable P.A. System	Communication

H-6b Fire extinguishers:

There are fire extinguishers located throughout the facility as required by the appropriate local fire code as well as the National Fire Protection Association (NFPA) code. The facility employs Type ABC fire extinguishers which are multipurpose combinations of the extinguisher types listed below.

- Type A is capable of extinguishing fires involving ordinary combustible wastes such as wood, cloth, paper, rubber, and many plastics.
- Type B is capable of extinguishing fires involving flammable liquids, oils, greases, tars, oil base paints, lacquers, and flammable gases.
- Type C is capable of extinguishing fires involving energized electrical equipment.

In Buildings I and J, small containers of dry powder fire extinguisher will be kept on hand in any area where open containers are handled (i.e., Areas I300 and J200). In addition, Buildings I and J will be provided with a foam fire suppression system instead of the water sprinklers provided in other areas of the plant.

H-6c Fire hydrants:

Fire hydrants are available for fire control. They receive their water supply from the City of Wichita Department of Water.

H-6d First Aid Stations:

Cabinets of first aid and medical supplies such as bandages, tape, antibacterial ointments, pain relievers, splints, local and topical anesthetics and eyewash bottles and solution are located throughout the facility (see Figure H.1 for first aid station locations).

H-6e Personal Protective Equipment (PPE):

The PPE listed below is available to facility personnel; PPE is issued as appropriate.

- Chemically resistant garments
- Chemically resistant gloves
- Chemically resistant boots
- Coveralls
- Steel-toed boots
- Hard hats

- Face shields and protective eyeglasses
- Air purifying respirators
- Self-contained air supply (as described below)

H-6f Safety Showers and Eye Wash Stations:

There are two (2) stations located in the facility. They are designed to meet OSHA requirements. Locations for these stations are provided on Figure H.1, Emergency Equipment/Evacuation Routes.

H-6g Self-Contained Breathing Apparatus (SCBA):

SCBAs are available to provide breathing air, which may be needed by some personnel in the event of an emergency situation.

H-6h Other Emergency Response Equipment:

- Portable Pumps - Pumps that handle liquids and sludges are available for recovering any released contaminants.

- Stabilizing agents - Stabilizing materials will be stored in Building B to assist in spill release containment and cleanup.

- Overpack drums - Overpack drums will be available in each Container Storage Building where containerized hazardous waste is stored. Leaking drums may be placed inside these overpack drums for containment.

- Site Equipment - Mobile equipment may be used to respond to hazardous waste releases. Facility equipment typically maintained includes industrial trucks (forklifts) and a multi-purpose vehicle (Bobcat).

H-7 Coordination Agreements: 40 CFR 264.52(c), 264.37

H-7a Emergency Authorities:

Coordination agreements with local emergency authorities have been negotiated; letters to these authorities are presented in Appendix H-C, Coordination Agreement Letters in compliance with 40 CFR 264.37. Copies of this plan will be submitted to the organizations identified in Appendix H-C; amendments to the plan will be forwarded to

these authorities as required. Procedures for notification of emergency authorities are described in Section H-5a.

H-7b <u>Local Contractors:</u>

In the event that on-site cleanup of a spill or release is required, CHK has limited equipment on-site to respond. Outside contractors may be used as needed to respond to a spill or release. In addition, Clean Harbors has a Remedial Services Division that is capable of responding to hazardous waste spills and/or releases.

H-8 Evacuation Plan: 40 CFR 264.52(f)

In each exigent situation, the ERC will determine whether a facility evacuation is necessary to protect the health and safety of facility personnel. The following criteria will be considered in making this decision.

H-8a Criteria for Evacuation:

- Fire and/or explosion that releases vapors or fumes which will endanger the health of facility personnel.
- Fire and/or explosion that could ignite other hazardous wastes and, in turn, endanger facility personnel.
- Spill and/or release that releases vapors or fumes that will endanger the health of facility personnel.

If the ERC determines that a site evacuation is necessary, the following procedures will be followed to implement the evacuation.

- The ERC or person designated by the ERC shall activate the appropriate alarms/sirens indicating that a site evacuation is required. If the alarm/siren system is not functioning, the intercom system will be used.
- All facility personnel shall meet at the appropriate evacuation point(s).
- The ERC or person(s) designated by the ERC will perform a count of all personnel at the evacuation point(s).
- If any persons are not accounted for, the ERC will coordinate efforts to search the appropriate areas to locate the missing personnel.
- Personnel shall evacuate the site according to the evacuation routes shown on Figure H.1. All personnel will be informed of these procedures and routes in their initial training program.

Personnel may return to the site when allowed to do so by the ERC.

H-9 Required Reports: 40 CFR 264.56(j)

H-9a Reports to the Secretary:

If the Contingency Plan is implemented per 40 CFR 264.51(b), CHK will submit a written report to the Secretary within 15 days after the incident in compliance with 40 CFR 264.56(j).

The report will include the following information.

- Name, address, and telephone number of the owner or operator
- Name, address, and telephone number of the facility
- Date, time, and type of incident (e.g., fire, explosion)
- Name and quantity of material(s) involved
- The extent of injuries, if any
- An assessment of actual or potential hazards to human health or the environment, where this is applicable
- Estimated quantity and disposition of recovered material that resulted from the incident
- Notification that the equipment used in response to the incident is fit for its intended use

H-9b <u>SARA Reporting:</u>

As soon as practicable after a release which requires notice under the Superfund Amendments and Reauthorization Act (SARA), CHK or the ERC will provide a written report to the LEPC as required by regulations set forth under that Act.

Appendix H-A

Emergency Response Coordinator Authorization

Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

May 15, 2012

RE: Emergency Coordinator authorization to commit the resources needed to carry out the contingency plan (CFR 40 265.55)

I authorize Brian Key, the Wichita facility Emergency Coordinator, to commit resources in response to a Contingency plan activation.

Sincerely,

Mike Foley
SVP TSDF Operations

Cc;
Brian Key
Part B permit

Appendix H-B

Emergency Telephone Listing of Local Authorities

Emergency Telephone Listing of Local Authorities

Clean Harbors Kansas, LLC
2549 North New York Avenue
Wichita, Kansas, 67219

Office Telephone No.: 316-269-7400

Agency	Office Telephone	Emergency Telephone
Sedgwick Co. EMS	316/383-7994	911
St. Francis Emergency Center	316/268-5052	316/268-5052
Wichita Fire Dept.	316/268-4451	911
WFD HazMat Team	316/838-8655	911
Wichita Police Dept.	316/268-4239	911
KDHE	785/296-1079	785/296-0614
EPA Region VII	913/281-0991	913/281-0991
National Response Center (NRC)	800/424-8802	800/424-8802
Derby Refinery After 5:00 PM	316/262-5703	[redacted]
Union Pacific	316/268-9433	[redacted]

Ex. 6 PII

Note: See Table H-1 for list of ERCs.

Appendix H-C

Coordination Agreement Letters

Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

May 16, 2012

Via Christ Emergency Services
929 N. St. Francis Street
Wichita, KS 67214

Certified mail number 7008 1830 0003 3581 6872

RE: Facility Contingency/Emergency Plan
Clean Harbors of Kansas LLC
EPA ID # KSD007246846

Dear Emergency Responder,

The Clean Harbors of Wichita Contingency Plan has been modified as part of the ongoing Part B permit renewal.

Please replace your present copy of the Clean Harbors of Wichita Contingency Plan with this version.

Please complete and return the attached Facility Contingency /Emergency Acknowledgement letter plan in the self addressed envelope included in this mailing.

If, after review of the information presented, you have any questions please feel free to contact Mr. Brian Key at 316-269-7400 or myself at 513-681-6242 ext. 6364.

Respectfully submitted

Stephen Bley
Regulatory Compliance Manager

Cc: File
Brian Key