Site Name: Westlake Landfill
Type of Response: Remedial (PRP)
Address of Site: 13570 St. Charles Rock Road
Bridgeton, MO

CERCLA ID#: MOD079900932
USEPA Site ID#: 0714
Start Date: 27 October 2013
End Date: 31 December 2013

This HASP is for use by EPA OSCs and other applicable EPA personnel for responses or operations conducted under the NCP. The NCP states in 40 CFR 300.150(a) that "Response actions under the NCP will comply with the provisions for response action worker safety and health in 29 CFR 1910.120…" The NCP also states in 40 CFR 300.135(l) that "The OSC/RPM is responsible for addressing worker health and safety concerns at a response scene, in accordance with section 300.150." Accordingly, the OSC has determined that a HASP is required for this site in accordance with the NCP and 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response (HAZWOPER).

EPA's health and safety responsibilities under the NCP do not relieve other employers working at this site from meeting their responsibilities under HAZWOPER for their employees' health and safety. In accordance with the NCP 40 CFR 300.150(e)], "All government agencies and private employers are directly responsible for health and safety of their own employees."

All employers that participate in this HASP acknowledge that they comply with any applicable requirements under 29 CFR 1910.120 (HAZWOPER), 29 CFR 1910 Subpart I (Personal Protective Equipment and 29 CFR 1910 Subpart Z (Toxic and Hazardous Substances).

As required by paragraph (b) of HAZWOPER, EPA has a written safety and health program which by incorporation includes this HASP, other safety and health programs (PPE, respiratory protection, medical surveillance, site control, spill containment), the organizational structure, and a comprehensive workplan. Any aspects of the various programs, the organizational structure, or the comprehensive workplan that are refined at the site level are captured in this HASP.

This HASP will be kept on site per paragraph (b)(4)(i) of HAZWOPER and addresses all of the elements required in paragraph (b)(4)(ii)(A – J) of HAZWOPER:

(A) Safety and health risk or hazard analysis
(B) Employee training assignments
(C) Personal protective equipment (PPE)
(D) Medical surveillance requirements
(E) Air monitoring, personnel monitoring, and environmental sampling
(F) Site control measures
(G) Decontamination procedures
(H) Emergency response
(I) Confined space entry procedures
(J) Spill containment program

| HASP Prepared by: | Signature: | Date: |
|---|---|---|
| James Johnson | | |



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## A. SITE INFORMATION: ROLES AND RESPONSIBILITIES

| |
|---|
| **Site Name:** Westlake Landfill |
| **Site Address:** 13570 St. Charles Rock Road, Bridgeton, MO 63044 |
| **Date of Activities:** 10/27 – 12/31/2013 |
| **Site Description Including History:** The Westlake Landfill is an on-going Superfund remedial project. EPA representatives are on-site overseeing Potentially Responsible Parties (PRP) actions. A detailed history of the site and current actions can be found in attachment 1. |
| **Scope of Work:** EPA personnel will be conducting oversight of PRP actions. |

| Site Roles/Responsibilities | | | |
|---|---|---|---|
| **Site Role/Responsibility:** | **Employer:** | **Name:** | **Title:** |
| EPA OSC/Site Safety Officer | US EPA – see attachment II | OSC on site for weekly actions. | OSC |
| EPA Observer | US EPA | Not applicable | ORD/RPM |

## B. SITE TASKS AND DESCRIPTIONS

Identify the individual tasks or activities that are required to complete the scope of work. A JHA (Section C) must be completed for each task listed below.

| Site Tasks and Descriptions | | |
|---|---|---|
| **Task Number:** | **Task Titles:** | **Task Descriptions:** |
| 1 | PRP project oversight | N/A (No JHA required at this time, if needed the HASP will be updated to reflect this update) |
| | | |

Additional tasks and JHAs can be found in Attachment 1 which contains the specific health and safety plans for PRP personnel respectively. EPA personnel will follow these plans, as appropriate and applicable, during the performance of any of the tasks listed therein.

## C. EVALUATION AND HAZARD CONTROL

A detailed evaluation of potential hazards can be found as part of attachment 1. The tasks being performed by EPA personnel do not warrant specific evaluations, but will be addressed as updates to this HASP as appropriate.

## D. PERSONAL PROTECTIVE EQUIPMENT (PPE)

| Site Roles/Responsibilities | |
|---|---|
| **Site Role/Responsibility:** | **PPE requirements** |
| EPA OSC/Site Safety Officer | Steel toe boots, hard hat, safety glasses or goggles, vest and a Thermoluminescent Dosimeter |
| EPA Observer | Observer role will use above PPE if applicable |



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## E. SITE CONTROL

| Work Practices and Control Measures |
|---|
| **Procedures for Restricting Access to the exclusion zone (EZ) and contamination reduction zone (CRZ):** |
| Described in detail in attachment 1. |
| **Work Shift Schedules:** |
| Approximately 7:00am to 6:30pm |
| **Other Safe Work Practices:** |
| EPA personnel will be aware of potential hazards associated with onsite road traffic. |

| Standard Hand Signals | |
|---|---|
| **Hand Signal:** | **Meaning:** |
| Thumbs up | I'm OK/I agree |
| Thumbs down | I don't agree |
| Hands across throat | Out of air/trouble breathing |
| Grab hand/arm | Come with me |
| Hands on head | I need assistance |

**Site Maps:**

Site maps can be found in attachment 1.

## F. EMERGENCY RESPONSE PLAN

| Emergency Response Procedures |
|---|
| **Accident Reporting/Investigation:** |
| Accidents involving injuries requiring professional medical attention must be reported within one hour of occurrence to the Safety Officer.<br>-First aid cases not involving professional medical attention must be reported within 24 hours after occurrence.<br>-Incidents involving property damage must be reported within 24 hours of occurrence.<br>-After hours illnesses must be reported within 24 hours (i.e. flu, rashes)<br>(See the Injury, Illness, and Exposure Reporting chapter) |
| **Additional Emergency Response Procedures:** |
| Refer to attachment #1 |
| **Procedures for Response Critique and Follow-up:** |
| Follow up with regional health and safety personnel. |

**Emergency Equipment/Facilities and Emergency Contact Information**

No EPA equipment is required for this site. EPA contact information can be found as attachment 3. A detailed list of PRP equipment and contact information can be found in attachment #1.

**Emergency Planning:**

Evacuation routes, safe distances, and places of refuge have been identified and are discussed at the daily safety briefing and can be found in attachment 1.

**Hospital Location and Route:**

SSM DePaul Health Center
12303 DePaul Drive



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St. Louis, MO 63044-2588
Refer to the plan in attachment 1for maps and hospital route.

## G. DECONTAMINATION

EPA personnel should not encounter a need to perform decontamination. If necessary, refer to the health and safety plan for decontamination procedures in attachment #1.

## H. ENVIRONMENTAL AND PERSONAL MONITORING

Environmental and personal monitoring requirements and procedures are listed in attachment #1. EPA personnel will adhere to the requirements, as applicable, found in Attachment #1 that correspond to the tasks being performed.

## I. PERMIT-REQUIRED CONFINED SPACE (PRCS) ENTRY PROCEDURES (IF APPLICABLE)

No confined spaces are expected at this site.

## J. SPILL PREVENTION AND RESPONSE

Refer to attachment #1.

## K. TRAINING

| **Emergency Responder Core Training** | |
|---|---|
| **Health and Safety** | |
| Medical surveillance | First aid (29 CFR 1910.120) |
| Fit test | Radiation safety (EPA Order 1440) |
| 40-hour HAZWOPER training (165.5 or equivalent) or 24-hour HAZWOPER if appropriate | Radiation safety refresher (EPA Order 1440) |
| 8-hour HAZWOPER refresher | Radiation safety/badge training (4 hours) |
| 8-hour HAZWOPER supervisor | Defensive driving (EPA Order 1440.2) |
| Bloodborne pathogens (1910.1030) | Asbestos awareness (EPA Order 1440) |
| CPR | |
| **Site-Specific Training** | |
| Initial site specific training provided by PRP | |
| | |
| | |

| **Site Safety Briefings (Attendees at each site safety briefing must sign an attendance sheet)** | | |
|---|---|---|
| **Date and Time:** | **Topic Addressed:** | **Led By:** |
| Daily | Daily Safety Message | PRP Safety Officer |
| | | |
| | | |

## L. MEDICAL SURVEILLANCE

**Medical Requirements:** OSCs must be in a Medical Surveillance Program in accordance with 29 CFR 1910 and 29 CFR 1926. A medical examination must have been completed within a 12-month period



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prior to on-site activity and repeated annually.

**Episodic Examinations:** Following any accidental or suspected uncontrolled exposure to site contaminants, employees should be scheduled for a special medical examination. In the event of such suspected exposure, an injury report must be completed and sent to the SHEMP Manager (or another designated person) within 24 hours.

**Thermoluminescent Dosimeter (TLD) Requirements:** OSCs must be in a TLD program. TLDs must be worn at all oil and hazardous waste sites and all sites where there is a potential for exposure to ionizing radiation.

For additional information see the Medical Surveillance Program chapter for medical surveillance requirements.

Documentation of EPA training can be found on-line on the EPA Field Readiness Module.

## M. EMPLOYEE EMERGENCY NOTIFICATION PROCEDURES

Emergency notification procedures that do not already exist in the emergency response plan in the HASP are provided below.

| Emergency Notification Procedures | | |
|---|---|---|
| **Employer:** | **Contacts:** | **Telephone Numbers:** |
| EPA Region 7 | Emergency Spill Line | 913-281-0991 |
| | | |
| | | |
| | | |
| | | |

## N. EPA STANDARD OPERATING PROCEDURES

Standard Operating Procedures will be updated as needed for this site.



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**ATTACHMENT #1**

Feezor Engineering, Inc GCPT Health and Safety Plan



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**ATTACHMENT #2**

EPA Westlake Oversight Calendar (November 2013)



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**ATTACHMENT #3**

EPA Contact List



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# HEALTH & SAFETY PLAN

DRAFT

**Date:**
**Amendment Date:**

## Amendment Information:

_____
_____
_____

**U.S. Environmental Protection Agency, Region #7**
**On-Scene Coordinator:** _____

**Other Employers:** _____
**Representatives:** _____

Plan Concurrence:

| | |
|---|---|
| _____<br>USEPA On-Scene Coordinator | _____<br>Date |
| _____ | _____<br>Date |
| _____ | _____<br>Date |