GUIDANCE DOCUMENT DEC 12, 2014

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Hazardous Waste Contingency Plans

Office of Land Quality / Compliance and Response Branch

(317) 234-8603 • (800) 451-6027 www.idem.IN.gov 100 N. Senate Ave. Indianapolis, IN 46204

Hazardous Waste Contingency Plans

Contingency Plan Preparation Guidance

Federal and State hazardous waste regulations (40 CFR 265 Subpart D--Contingency Plan and Emergency Procedures (40 CFR 265.50 through 265.56), referenced by 329 IAC 3.1-10-1), require that large quantity hazardous waste generators (by reference in 40 CFR 262.34) and treatment, storage and disposal facilities (TSD's) must have, and be prepared to implement, a Contingency Plan which is designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

The following discussion provides guidance on key elements of the contingency plan. Also attached is a suggested outline for a contingency plan and a model plan. This guidance applies to generators and to facilities under interim status. Site-specific requirements for permitted facilities will be developed during the Part B permitting process.

The plant-specific Contingency Plan will, of course, be organized and worded as is best suited to the facility. The Plan, and all parts, should be specific regarding what to do, who to notify, and in the case of off-plant assistance, what those groups will and will not do during the emergency.

Although the contingency plan provides a plan of action during and following an emergency situation, training is necessary and required to ensure that the correct actions are taken during an emergency. In addition to the training given to all personnel, the emergency coordinators should receive specialized training for this role. A crew of employees should also be specially trained to assist the emergency coordinator in dealing with an emergency.

Contingency Plan Implementation

The contingency plan is a document which sets out an organized, planned, and coordinated course of action to be followed in case of a fire, explosion, or release of hazardous waste or its hazardous constituents which could threaten human health or the environment. The plan need not address all product spills but must address spills of materials which are hazardous wastes.

The contingency plan must be implemented for an on-site, as well as an off-site release that could threaten human health and the environment, even if the emergency coordinator does not believe that the wastes will leave the site. The contingency plan was designed to deal with threats to facility personnel, as well as with threats to people outside the facility. The preamble to Subpart D of the federal regulations notes that the Agency did not intend to require implementation for releases of "insignificant amounts" of hazardous waste, such as very small spills or a leaking valve.

At a minimum, the plan must map out general strategies to deal with both sudden and non-sudden events. Such strategies must involve outlining a series of steps to be taken in response to an incident and should include decision points where outside assistance may be required and the circumstances under which evacuation of the facility is advisable. The following criteria should be used in the contingency plan implementation decision process:

1. The contingency plan must be implemented if an imminent or actual incident could threaten the environment or human health.

    a. Spills

        The spill could result in release of flammable liquids or vapors creating a fire or gas explosion hazard.

        The spill could cause the release of toxic liquids, vapors or fumes.

        The spill can be contained on-site but the potential exists for groundwater pollution due to aquifer contamination.

        The spill cannot be contained on-site resulting in off-site soil contamination and/or ground or surface water pollution.

    b. Fires

        The fire could cause the release of toxic vapors or fumes.

        If the fire spreads, it could ignite materials at other locations at the site or cause heat-induced explosions.

        The fire could spread to off-site areas.

        Use of water or water and chemical fire suppressant could result in contaminated run-off.

    c. Explosions

        An imminent danger exists that an explosion could occur, resulting in a safety hazard due to flying fragments or shock waves.

        An imminent danger exists that an explosion could ignite other hazardous waste at the facility.

        An imminent danger exists that an explosion could result in release of toxic material.

        An explosion has occurred.

Emergency Coordinators

The facility must select at least one (1) employee who is either on the facility premises during normal operational periods or is available to respond to an emergency by reaching the facility within a short period of time. This employee must be designated the primary emergency coordinator. The emergency

coordinator is responsible for coordinating all emergency response measures, and being thoroughly familiar with:

-- The facility's contingency plan;

-- All operations and activities at the facility;

-- The location and characteristics of waste handled;

-- The location of all records within the facility; and

-- The physical layout of the facility.

The selected emergency coordinator must have the authority to expend funds and recruit employees to implement the Contingency Plan. The owner/operator should also select alternate emergency coordinators if for some reason the designated emergency coordinator may be unavailable.

Emergency Response Procedures for Spills, Fires, and Explosions

The appropriate level of response to a particular incident is largely a matter of professional judgment. However, the full range of response methods to be employed in a variety of potential situations can be anticipated and, thus, should be outlined as emergency procedures. The level of detail appropriate for these response procedures is dependent upon a number of factors including:

-- The type of waste handled.

-- The potential for fires, explosions, or releases.

-- The immediate health and safety effect of the incident upon personnel.

-- The potential hazard to the outside environment.

The contingency plan must contain elements which address emergency procedures to be undertaken:

-- Immediately upon discovery of an emergency.

-- During emergency control phase.

-- Immediately following attainment of control.

Immediately upon discovery of an imminent or actual emergency, the first duty of the emergency coordinator is to warn the operating personnel, since they are likely to be the first group exposed to danger. Secondly, appropriate State or local emergency response agencies should be called if their assistance is needed to cope with the emergency.

In the event of a release, fire, or explosion, the emergency coordinator must identify the character, exact source, amount, and extent of any released material. He also must assess possible hazards to the environment and human health. The identification of the discharged material may be accomplished through observation, review of manifests, and if necessary, by chemical analysis, although response

should not be delayed until the analysis is complete.

If the release, fire, or explosion could threaten the environment or human health outside the facility, the emergency coordinator must immediately notify the appropriate local authorities and notify either the on-site scene U.S. Environmental Protection Agency (EPA) coordinator for that geographical area, or the National Response Center at AC 800/424-8802, and the Indiana Department of Environmental Management (IDEM), Office of Emergency Response at AC 317/233-SPIL (7745).

During the emergency control phase, the emergency coordinator must take all reasonable steps necessary to ensure that explosions and releases do not occur, recur, or spread to other hazardous wastes at the facility. These steps include, where applicable, stopping operations. The emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever appropriate. Details should be provided to emergency personnel concerning the types of on-site emergency equipment to be used and the need for personnel protection equipment.

Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material. The recovered material must be handled as a hazardous waste unless it is a characteristic hazardous waste only, which is analyzed and determined not to be hazardous. The emergency coordinator must ensure that in the affected areas of the facility, no waste that may be incompatible with the released material is treated, stored, or disposed until cleanup procedures are completed. All emergency equipment must be cleaned and made fit for its intended use before operations are resumed.

Emergency Equipment

40 CFR 265.52(e), referenced by 329 IAC 3.1-10-1 of the State hazardous waste regulations, specifies that the plan include a list of all emergency equipment at the facility. In addition, the location of this equipment is to be noted and a physical description of each item on the list is to be provided along with a brief outline of the equipment's capabilities. Emergency equipment will vary from facility to facility, but must include the following as required by the regulation, unless none of the hazards posed by waste handled at the facility could require the equipment's use:

-- An internal communication or alarm system capable of providing emergency instructions.

-- A device capable of summoning external assistance (telephone or two-way radio).

-- Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment.

This list will be used by facility personnel during an emergency. The format for the list should, therefore, allow identification of any needed equipment and its location in the easiest possible manner. It is suggested that a plot plan showing the locations of the equipment also be included in the Plan.

Evacuation Plan

The Contingency Plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. Where no possibility exists that facility evacuation could ever be

necessary, this plan element may be omitted. Situations which would warrant partial or complete evacuation are as follows:

-- Explosions resulting in airborne debris including container fragments and hazardous waste.

-- Spills or chemical reactions resulting in toxic vapors or fumes.

-- Fire when it cannot be contained and is spreading to other parts of the facility, or when fire could generate toxic vapors or fumes.

-- All incidents where necessary protective equipment is not available to emergency response personnel.

The evacuation plan must ensure the safe egress of facility personnel. The evacuation plan must indicate a recognizable signal to start evacuation, evacuation routes, and alternate evacuation routes (in case primary exit routes are blocked by releases of hazardous waste or fires).

Required Reports

Within fifteen (15) days after an incident requiring implementation of the contingency plan, the owner or operator must submit a written report on the incident to the EPA Regional Administrator, and the Commissioner of the Indiana Department of Environmental Management, which includes:

-- Name, address, and telephone number of owner/operator.

-- Name, address, and telephone number of the facility.

-- Date, time, and type of incident.

-- Name and quantity of materials involved.

-- An assessment of actual or potential hazards to human health or the environment.

-- Estimated quantity and disposition of recovered material that resulted from the incident.

Before operations are resumed in the affected areas of the facility, the owner/operator must notify the Regional Administrator and appropriate State and local authorities that the facility is in compliance with follow-up procedures to an emergency, prior to resuming operations in the affected areas.

Amendment of the Contingency Plan

The contingency plan must be reviewed, and immediately amended, whenever the following situations apply: applicable regulations are revised; the plan fails in an emergency; the facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases; the list of emergency coordinators changes; or the list of emergency equipment changes.

For More Information

Contact the Compliance Branch, Office of Land Quality at 317-232-8603, or the IDEM toll-free number 1-800-451-6027.

Suggested Outline Contingency Plan

1. Facility Identification and General Information

    a. Name of Facility
    b. Address of Facility
    c. Name, Title, Home Address, and Telephone Number (office and home) of Primary Emergency Coordinator
    d. Type of Facility
    e. Site Plan
    f. Description of Generator, TSDF Activities

2. Emergency Coordinator

    a. Primary Coordinator
    b. Alternate Coordinators
    c. Duties and Authority to Commit Resources

3. Implementation of the Contingency Plan

    a. Spills
    b. Fires
    c. Explosions

4. Emergency Response Procedures for Spills, Fires, and Explosions

    a. Immediately upon discovery of an emergency (Notification)
    b. During the emergency control phase (Control and Containment)
    c. Following attainment of control (Follow-up)

5. Emergency Equipment

    a. Emergency Equipment Inventory
    b. Location of Emergency Equipment (Facility Diagram)
    c. Equipment Capabilities
    d. Emergency Equipment Available from Other Sources

6. Coordination Agreements and Telephone Numbers

    a. Police
    b. Fire
    c. Hospital
    d. Other Emergency Response Units
    e. Spill Contractors

7. Evaluation Plan

    a. When to Evacuate
    b. Signals to Begin Evacuation
    c. Primary Evacuation Routes
    d. Alternate Evacuation Routes

8. Required Reports

    a. Incident Report
    b. Notification of Compliance Before Resuming Operations

9. Amendment of Contingency Plan

    a. Revised Regulations
    b. Facility Change
    c. Emergency Coordinator Change
    d. Emergency Equipment Change

Contingency Plan*

Perfect Craft Manufacturing Co.
1988 Diamond Boulevard
Nature Valley, Indiana 46100

IND000123456

*This model contingency plan is for guidance purposes only.

1. Facility Identification and General Information

Name: Perfect Craft Manufacturing Company
Location: 1988 Diamond Boulevard,
Nature Valley, Indiana

Operator: Mr. Dan Dearthy
123 Tobacco Road
Nature Valley, Indiana 46100
Telephone: AC 317/555-5000 (office)
AC 317/555-8217 (home)
AC 317/555-2310 (cell)

Emergency Coordinators:

Mr. Fred Gordon
456 Contingency Lane
Nature Valley, Indiana
Telephone: AC 317/555-0000 (office)
AC 317/555-8127 (home)
AC 317/555-3014 (cell)

Mr. John Davis
789 Evacuation Route
Nature Valley, Indiana
Telephone: AC 317/555-5000 (office)
AC 317/555-2188 (home)
AC 317/555-3422 (cell)

Type of Facility

Large quantity generator of hazardous waste with interim status for the on-site storage of hazardous waste in tanks and containers.

Container storage capacity = 4,125 gallons
Tank storage capacity = 10,000 gallons

Facility Site Plan

See Figure 1 on next page.

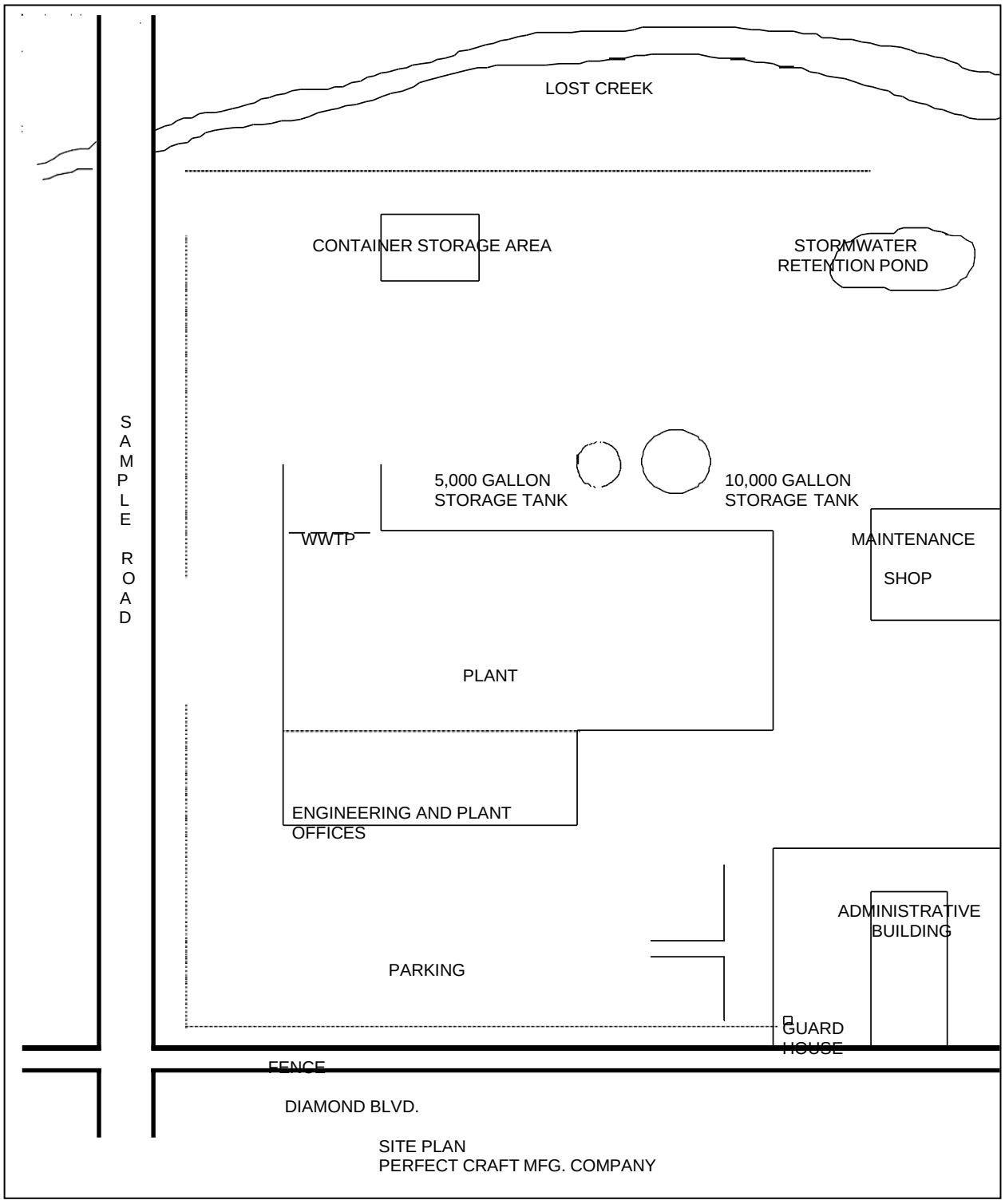
LOST CREEK
CONTAINER STORAGE AREA
STORMWATER
RETENTION POND
SAMPLE ROAD
5,000 GALLON
STORAGE TANK
10,000 GALLON
STORAGE TANK
WWTP
MAINTENANCE
SHOP
PLANT
ENGINEERING AND PLANT
OFFICES
ADMINISTRATIVE
BUILDING
PARKING
GUARD
HOUSE
FENCE
DIAMOND BLVD.
SITE PLAN
PERFECT CRAFT MFG. COMPANY

Figure 1

Description of Generator and TSD Activities

Manufacturer of custom fiberglass boats and custom metal boat trailers. Processes include the hand lay-up of fiberglass hulls; the building and finishing of teakwood decks; metal fabricating; phosphating and painting; and cyanide, chromium electroplating of small parts.

Hazardous wastes are generated from various processes in the plant.

Fiberglass Operations:	Waste Acetone (F003) Waste Acetone still bottoms (F003)
Wood Finishing:	Waste Toluene (F005)
Metal Finishing (Painting):	Waste Toluene (F005)
Electroplating:	Sludge from treatment of rinse waters (F006) Spent cyanide plating bath solutions (F007) Bottom sludge from cyanide plating bath solutions (F008)

Perfect Craft Manufacturing Company has interim status for the storage of waste acetone (liquid and still bottoms) and cyanide plating baths and bottom sludges in 55-gallon containers. Wastewater treatment sludge is also stored on the pad in 20 cu/yd roll-off containers.

Waste toluene is stored in a 10,000-gallon aboveground tank located just northeast of the main plant. Waste mineral spirits are stored in a 5,000-gallon aboveground tank located next to the 10,000 gallon tank.

2. Emergency Coordinators

Principle: Mr. Fred Gordon
Contingence Lane
Nature Valley, Indiana
Telephone: AC 317/555-5000 (office)
AC 317/555-8372 (home)
AC 317/555-1489 (cell)

Alternate: Mr. John Davis
789 Evacuation Route
Nature Valley, Indiana
Telephone: AC 317/555-5000 (office)
AC 317/555-2188 (home)
AC 317/555-8743 (cell)

The emergency coordinator serves as chief of the emergency crew, which is on each operating shift. These personnel have received intensive additional emergency training above regular plant emergency training.

One of the emergency coordinators is always "on call", i.e., can be reached by home or cell telephone.

Mr. Dan Dearthy, President and facility operator, has given authority to the above mentioned emergency coordinators to expend funds and recruit trained employees in the event an incident requires implementation of the Contingency Plan.

Both selected emergency coordinators are senior management personnel and are responsible for hazardous waste management at the site. The emergency coordinators are thoroughly familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout.

3. Implementation of the Contingency Plan

The Contingency Plan will be implemented if an incident might threaten human health or the environment. The emergency coordinator has full authority to make this decision.

Implementation of the contingency plan is not limited to incidents at the regulated storage units, but includes incidents at all hazardous waste generation and accumulation points throughout the plant. Furthermore, the contingency plan must be implemented whenever an incident might involve hazardous waste anywhere on the plant property. Depending upon the degree of seriousness, the following potential emergencies might call for the implementation of the contingency plan:

-- Spills

A spill of waste acetone or waste toluene from containers or tanks which can be contained on-site but the potential exists for groundwater pollution due to aquifer contamination.

A spill of any on-site generated or stored hazardous waste from containers or tanks which cannot be contained on-site resulting in off-site soil contamination and/or ground or surface water pollution.

-- Fires

A fire which could cause the release of toxic vapors or fumes from hazardous waste.

If the fire spreads, it could ignite materials at other locations at the site or cause heat-induced explosions.

A fire which could spread to off-site areas.

Use of water or water and chemical fire suppressant could result in contaminated run-off.

-- Explosions

An imminent danger exists that an explosion involving hazardous waste could occur, resulting in a safety hazard due to flying fragments or shock waves.

An imminent danger exists that an explosion could ignite other hazardous waste at the facility.

An imminent danger exists that an explosion involving hazardous waste could result in the release of toxic material.

An explosion has occurred.

4. Emergency Response Procedures for Spills, Fires, and Explosions

Immediately Upon Discovery of an Emergency

An employee discovering a spill, fire, or an imminent danger of explosion involving hazardous waste that is not easily controllable with equipment and materials at hand must contact the emergency coordinator. The emergency coordinator will immediately respond to the call and assess the situation. If the emergency can be controlled without evacuating the plant, emergency crew members will be contacted to respond to the incident. If the emergency coordinator determines that the incident requires evacuation of the plant, he will immediately activate the internal alarm. (NOTE: All Perfect Craft Manufacturing Company employees are instructed to activate the internal alarm system, if the incident is an obvious immediate threat to fellow employees or the environment.)

All employees hearing the alarm must close down their equipment and proceed to the administration building to await further instructions.

Members of the emergency crew will proceed to the plant engineering office to await further instructions from the emergency coordinator.

The emergency coordinator will concurrently assess the situation by identifying the character, exact source, amount and extent of any released material. He will also make an assessment of possible threats to human health and the environment.

If the incident could threaten the environment or human health outside the Perfect Craft Manufacturing Company property, the emergency coordinator will contact the Nature Valley Fire Department, the Nature Valley Police Department, and Pity Hospital if injuries have occurred from the incident.

The emergency coordinator will call the National Response Center, telephone AC 800/424-8802, and report the incident. The report will include the following:

-- Name and telephone number of the reporter.

-- Name and address of this facility.

-- Time and type of incident

-- Identification and quantity of materials involved.

-- The possible hazards to the environment and human health outside the facility.

In addition, the emergency coordinator will contact the Indiana Department of Environmental Management (IDEM), Office of Emergency Response at AC 317/233-SPIL (7745).

A designated member of the emergency crew will conduct a roll call for all employees who reported to the administration building and engineering office.

During the Emergency Control Phase

The emergency coordinator will take all necessary measures to contain the hazard within the facility property, and to prevent its spread to other nearby properties, with the assistance of the emergency crew and emergency personnel assigned by the various parties contacted.

Emergency crew members are instructed to carry respirators or self-contained breathing apparatus (SCBA)'s and wear boots, gloves, and safety glasses prior to responding to an emergency.

In case of a spill of flammable or toxic solvent waste, absorbent material will be placed on the spill by the emergency crew. If the spill is from a leaking or damaged container, it will immediately be over packed. In case of a spill of waste toluene from the tank, the emergency crew will dike around the tank with absorbent material. If the spillage is due to the tank being ruptured, an outside spill contractor will be contacted immediately to empty the tank. (See Figure 2 for more detailed instructions).

In case of a spill or release of waste cyanide, the alarm will sound an intermittent bell. In such a situation, the emergency crew is instructed to evacuate the area and join all other employees at the administration building. The Nature Valley Fire Department will immediately be requested to respond.

In case of a fire or explosion, emergency crew personnel are instructed that if the fire cannot be readily controlled with available equipment, the area must be immediately evacuated. (See Figure 3 for more detailed instructions).

Following Attainment of Control

Following containment and control of the emergency, the emergency coordinator, along with the emergency crew, will provide for collection, treatment, and disposal of the waste and contaminated soil, water, or other materials by the emergency crew or outside contractor, as appropriate.

The emergency coordinator will ensure that all emergency equipment is restored to full operational status by the emergency crew.

The emergency coordinator will investigate the cause of the emergency and will take steps to prevent a recurrence of such or similar incidents.

The emergency coordinator will make sure that cleanup and restoration have progressed at least to the point of not jeopardizing the health and safety of the employees, and that EPA staff and local authorities have been notified before permitting resumption of the operations affected by the emergency.

5. Emergency Equipment

Internal Communication/Alarm System

The main plant building is equipped with ten (10) wall-mounted switches tied into an electric bell alarm system. Ten (10) switches are located in production areas, adjacent to each of ten (10) work stations, and one each at the container storage pad and tank storage area. The switches are red and clearly marked for rapid identification.

Emergency Response
Procedures Tank and
Container Spills

1. Determine source of spill and stop all flows to the tank.

2. Identify the waste material spilled and determine the hazards involved in terms of potential for fire, hazardous gas release, corrosion, explosion, and water pollution.

3. Evacuate all endangered or unnecessary personnel. In case of the release of toxic or flammable gases, determine if off-site evacuation is advisable. Remove nearby wastes that may be incompatible with the spilled material.

4. All spill response personnel are to wear protective equipment, including respirators and/or SCBA's, and are to stay upwind of the spill to the extent that is possible.

5. Contain the spill to the smallest area possible. Examples of equipment available for spill containment are absorbent and spark proof shovels.

6. After the spill is contained, treat the spill with neutralizing agents to lessen risks of fire, corrosion, explosion, or other hazards. Apply non-reactive sorbent materials.

7. Decontaminate area affected by spill by removal of spilled and sorbent materials and contaminated soil.

8. Clean up, restore, or replace spill response equipment and return it to its original location.

Figure 2
Emergency Response Procedures
Tank and Drum Storage Fire

1. Determine what is on fire by location, drum label, inventory, log, or other means.

2. Determine if persons are endangered by the fire or if the fire could spread to other wastes.

3. Evacuate all endangered persons. In case of release of toxic gases or where there is potential for explosion, determine if off-site evacuation is advisable.

4. Define the limits of the fire. Estimate the potential dangers due to location with respect to other wastes in the immediate vicinity. Call the local fire department if they may be needed.

5. Fire fighting personnel are to wear full protective clothing and breathing apparatus as is appropriate.

6. Firefighting should be done at a maximum allowable distance staying upwind and from a protected location, if possible.

7. All fires shall be dealt with using fog protection (i.e., water spray). Small fires such as a single barrel fire can be approached with portable extinguishers, dirt, or sand to extinguish flames by smothering.

8. All large fires will require fog line protection with approaches made behind heavy equipment (e.g., front end loader) to smother fire and protect personnel.

9. Extra caution is to be taken with containerized material fires for signs of rupture or explosion due to heat releasing hot liquids, flammable vapors, or poisonous gases.

10. After fire, clean up affected areas. Run-off from water used in firefighting should be treated as a hazardous waste and disposed of properly.

11. Clean up all firefighting equipment and return it to its original location in a state of readiness.

Figure 3

Outside telephones are located throughout the main plant, maintenance shop, engineering offices administration building, and drum pad. The telephone numbers of the emergency coordinators, the Nature Valley Fire Department, and the Nature Valley Police Department are displayed prominently near all the telephones. The telephones have internal intercom capabilities.

Fire Control Equipment

To provide rapid response to fires, wall-mounted, hand-held fire extinguishers are centrally located at each of eight (8) areas within the main plant, maintenance shops, and drum storage pad. Because the primary danger of fire is from flammable liquids, carbon dioxide extinguishers are used. An automatic sprinkler system runs throughout the main plant. The sprinkler system is of the foam-water type.

Capabilities: Response to small fires.

Spill Control Equipment

Each working area within the plant and the drum storage pad is equipped with a supply of spill absorbing materials, shovels, and an emergency shower and eye fountain to wash off personal spills. The maintenance shop contains a large supply of absorbent material, shovels, over pack drums, and brooms for spill control.

Capabilities: Response, containment, and cleanup of spills throughout the facility.

Personal Protective Equipment

The maintenance shop also contains a large supply of coveralls, boots and gloves for emergency crew members. Also, each emergency crew member is assigned and test fitted in a full face respirator with appropriate cartridges.

Capabilities: To provide emergency crew members with protection when responding to emergency spills.

First Aid

The administration building houses a fully stocked first aid station.

Capabilities: To provide first aid for minor injuries which occur during normal situations or during emergencies.

Scott Air Packs

Self-contained breathing apparatus (SCBA) are located at the wastewater treatment area, maintenance shop, and administration building. SCBAs are to be used by trained personnel and only in extreme emergencies.

Capabilities: For the use of emergency crew members in extreme emergencies for rescue operations.

Figure 4 provides a facility plot plan showing the location of the above-mentioned emergency equipment.

6. Coordination Agreements and Telephone Numbers

Nature Valley Police Department (AC 317/265-7890)

The NVPD has received a copy of the contingency plan along with a layout of the facility. In a letter to the NVPD, Perfect Craft Manufacturing Company identified types of hazardous waste handled, places where workers are normally working, entrances, and evacuation routes. The NVPD personnel have received a special briefing on the hazards of cyanide waste spills and have worked out community evacuation routes and procedures.

Nature Valley Fire Department (AC 317/265-3456)

The NVFD has received a copy of the contingency plan. The fire department has visited the site and observed site access routes, the locations of high risk areas, and have inspected fire protection capabilities including the sprinkler system. These inspections are conducted twice per year. In addition, the fire department has conducted training exercises for the emergency crew using ignitable materials. The NVPD personnel have received a special briefing on handling of cyanide waste spills.

Pity Hospital (AC 317/265-5678)

Hospital personnel have received a special briefing on the health hazards of toxic solvent waste and cyanide waste and on treatment for exposure to these wastes. Also, the hospital has a Contingency plan calling for decontamination of victims.

Acme Trucking, Inc. (AC 317/265-8810)

A contractual agreement (copy attached) has been reached with Acme Trucking, a licensed hazardous waste transporter, to provide a 10,000-gallon tanker any time within one (1) hour's notice in case the waste naphtha or waste toluene tanks required emptying.

7. Evacuation Plan

Facility personnel will be evacuated if the emergency coordinator decides that their personal safety is in danger.

If evacuation is necessary, the facility alarm system will be activated, resulting in a continuous bell ring.

Facility personnel are instructed to immediately shut down all equipment and proceed to the nearest exit and assemble at the rear of the administration building. If the nearest exit is blocked, personnel must use the next nearest available exit. A diagram of available exit routes is located at

each work station (see Figure 5).

Emergency crew members must report to the engineering office to await further instructions from the emergency coordinator.

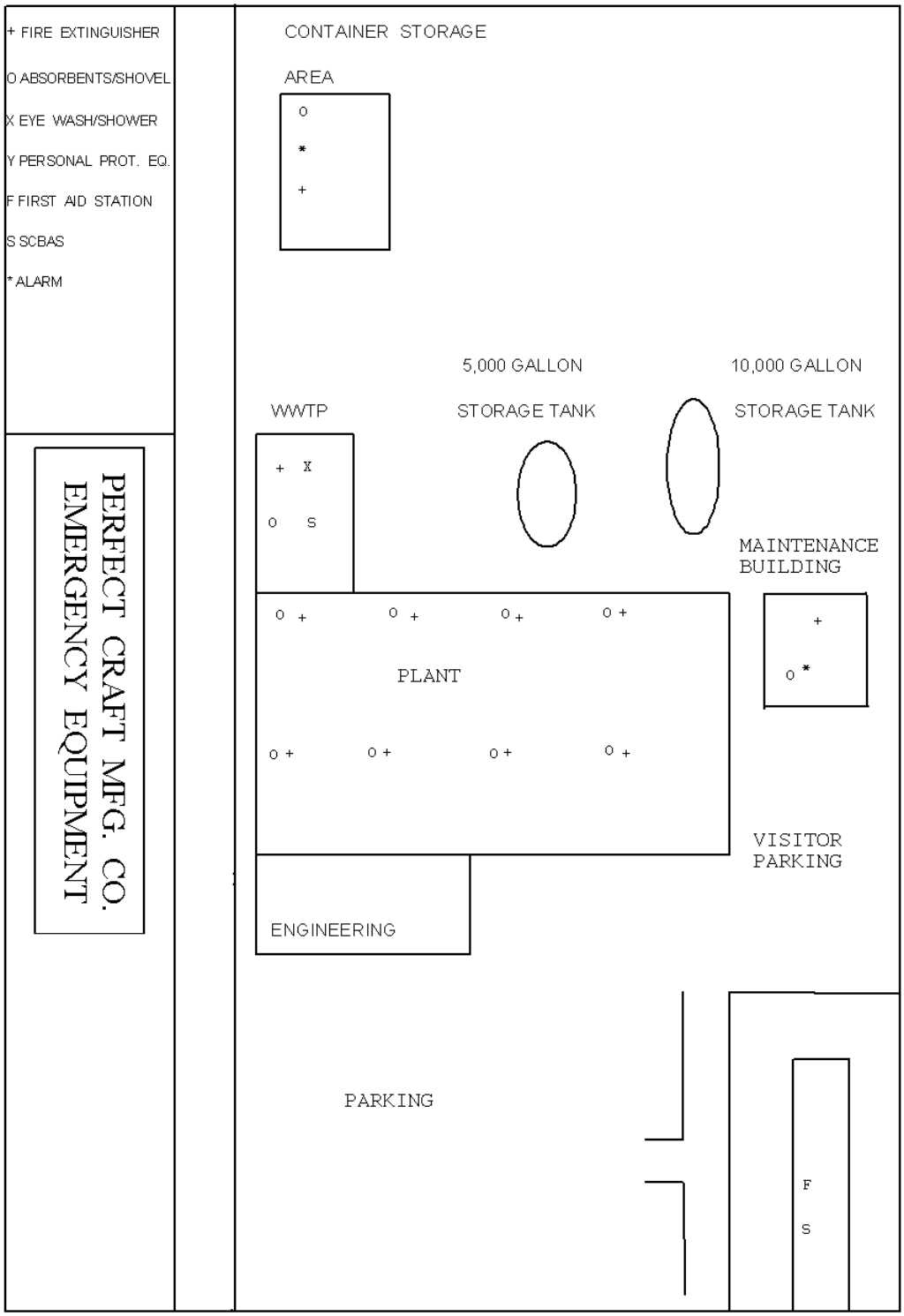
+ FIRE EXTINGUISHER
O ABSORBENTS/SHOVEL
X EYE WASH/SHOWER
Y PERSONAL PROT. EQ.
F FIRST AID STATION
S SCBAS
* ALARM
PERFECT CRAFT MFG. CO.
EMERGENCY EQUIPMENT
CONTAINER STORAGE
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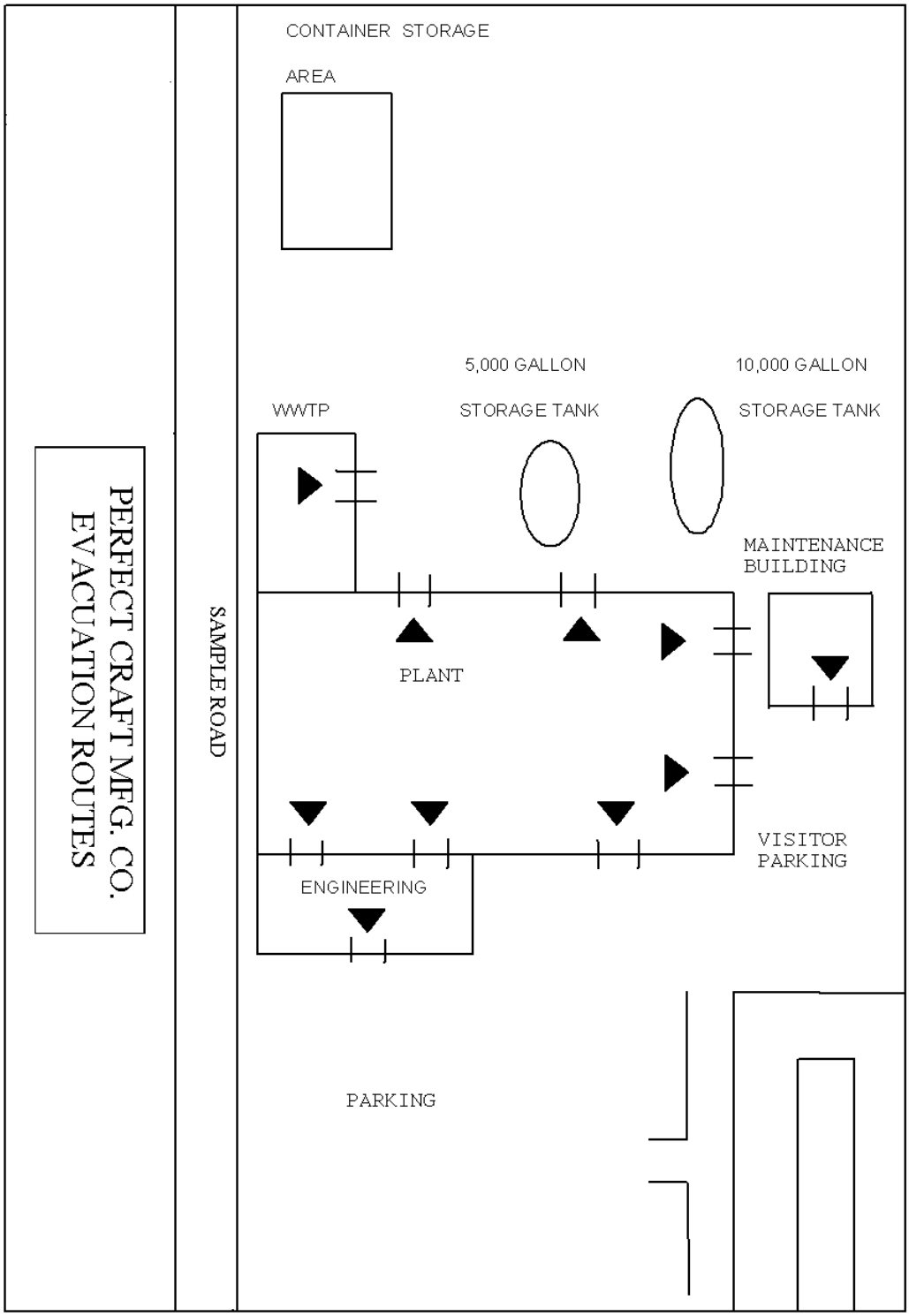
FIGURE 4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AREA
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STORAGE TANK
10,000 GALLON
STORAGE TANK
WWTP
MAINTENANCE
BUILDING
PLANT
VISITOR
PARKING
ENGINEERING
PARKING
SAMPLE ROAD
PERFECT CRAFT MFG. CO.
EVACUATION ROUTES

FIGURE 5

Each employee must immediately report to his/her supervisor upon reaching the administration building.

If the alarm signal changes to an intermittent ring, emergency crew members are instructed to immediately join all other employees behind the administration building.

8. Required Reports

Within fifteen (15) days of any incident requiring implementation of this contingency plan, the emergency coordinator will file a report with the EPA regional administrator and the Assistant Commissioner of the Office of Solid and Hazardous Waste Management (OSHWM). The report will include the following information:

-- Name, address, and telephone number of owner/operator.

-- Name, address, and telephone number of the facility.

-- Date, time, and type of incident

-- Name and quantity of material involved.

-- An assessment of actual or potential hazards to human health and the environment.

-- Estimated quantity and disposition of recovered material that resulted from the incident.

The operator will note in the operating record the time, date, and details of any incident that requires implementation of the contingency plan.

9. Amendment of Contingency Plan

Perfect Craft Manufacturing Company will review, and amend, this contingency plan whenever the following situations apply: applicable regulations are revised; the plan fails in an emergency; the faculty changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases; the list of emergency coordinators changes; or the list of emergency equipment changes.