

Russell, Merlin

From: Kurt Fogleman <kfogleman@perma-fix.com>
Sent: Tuesday, January 07, 2014 4:01 PM
To: Breland, Jabe; Russell, Merlin
Subject: Contingency Plan Update
Attachments: Perma-Fix of Florida Contingency Plan.pdf

Please see the attached contingency plan revision for Perma-Fix of Florida. Please let me know if you have any comments – I have yet to distribute it to response agencies. I have updated emergency equipment maps with locations of the new shower and eyewash combination installations. I have updated the contact information for the primary emergency coordinator as well.

Thanks,
Kurt

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CONTINGENCY PLAN

019C – Revision 16

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA 32653
(352) 373-6066**

DEP/EPA ID#: FLD 980 711 071

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TITLE: PERMA-FIX OF FLORIDA CONTINGENCY PLAN

PROCEDURE No.: 019C - REV. 16

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PREPARED BY: _____
KURT FOGLEMAN, EH&S MANAGER

DATE

APPROVED BY: _____
RAYMOND WHITTLE, GENERAL MANAGER

DATE

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1.0 SCOPE AND OBJECTIVES

This Contingency Plan (hereafter referred to as "the Plan") describes an organized course of action to be taken by Facility personnel or outside organizations in response to possible hazardous waste emergencies at the Perma-Fix of Florida, Inc. (PFF) facility (Facility). In addition, the Plan lists emergency equipment to be maintained on-site and designates the primary and alternate Emergency Coordinators. This Plan is designed to fulfill the Resource Conservation and Recovery Act (RCRA) Subpart D requirements of 40 CFR Part 264.

The Plan is designed to be a stand-alone document that provides instructions and guidance for responding to Facility emergencies. The Facility was designed and will be operated in a manner to prevent spills, fires, and explosions, in accordance with all permits and licenses. Personnel are trained to immediately implement and execute the Plan whenever there is an imminent or actual fire, explosion, or release of hazardous waste or hazardous waste constituents. Additionally, the Plan will be implemented in the event of natural disasters or bomb threats.

Updated copies of the Plan are posted within the Facility and maintained in the Facility Operating Record. Copies of the Plan and subsequent updates have been supplied to the state and local agencies that may be called upon to assist in the event of an actual emergency at the Facility. A copy of this Plan will be submitted to other agencies after receiving approval by the Florida Department of Environmental Protection (FDEP) of this Plan.

2.0 FACILITY OPERATIONS

PFF currently conducts a commercial waste bulking, storage, and transfer facility operation at its Gainesville, Florida facility. Waste managed on-site includes a wide variety of hazardous, industrial, mixed (i.e., a combination of hazardous and low-level radioactive), and non-hazardous wastes. PFF separately blends hazardous and mixed wastes into fuels for reuse (i.e., energy recovery) in permitted, off-site incinerators, industrial furnaces, boilers, etc. PFF also consolidates, repackages, and sorts waste materials for shipment and off-site treatment and/or disposal.

Permitted activities at the Facility include a variety of chemical and physical waste treatment activities. Specifically, PFF receives, stores, and treats hazardous waste. PFF is currently permitted for the following treatment operations: thermal desorption, chemical and physical extraction (extraction methods include water washing, high pressure steam, blasting, grinding, spalling etc.), chemical oxidation/reduction, size reduction and separation techniques, lab-pack decommissioning, neutralization, mercury amalgamation, deactivation, stabilization, microencapsulation, and macroencapsulation.

Existing treatment operations at the Facility include the Perma-Fix I® (PF-I) (chemical stabilization) and Perma-Fix II® (PF-II) (thermal desorption; chemical oxidation/reduction) processes, as well as treatment of hazardous debris in accordance with the alternative debris treatment standards specified in 40 CFR 268.45 (namely physical abrasion, chemical washing, and encapsulation). In addition, PFF is planning solvent recycling activities (distillation), which are exempt from RCRA permitting requirements. Complete details of these processes may be found in Part II Section I of PFF's RCRA permit application (dated December 2009). Figure CP-1 is a Site Plan showing the locations of hazardous waste management areas at the Facility. Figure CP-2 shows the location of the facility on a street map.

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Liquid scintillation fluid (LSF) is an example of one waste stream received at PFF. LSFs are generally received in vials and/or bulk from off-site generators. The vials are crushed, and the scintillation fluid is captured and consolidated into containers ranging from 5-gallon to 550-gallon, or pumped into a 3,000-gallon aboveground storage tank or pumped into DOT-approved containers. The containers are stored in the Processing and Storage Building (see Figure CP- 1). The scintillation fluid is then fuel blended and shipped off site for energy recovery. The broken vials are washed with an ethanol solvent and disposed as a non-hazardous solid waste.

PF-I and PF-II processes are conducted in the Treatment and Operations Building. Debris washing activities are conducted in a segregated area within the LSV processing area. The PF-II process, macroencapsulation, and solvent recycling activities are or will be carried out inside the Treatment and Operations Building. Fuel blending (bulking and de-watering) operations are conducted in the Processing and Storage Building.

Used oil is stored in the LSV Processing and Storage Warehouse (see Figure CP-1) in DOT approved containers. The used oil is generally fuel blended. Spent fluorescent lamps destined for recycling and various non-hazardous wastes are also stored in the LSV Processing and Storage Warehouse.

Additional information regarding facility operations relevant to contingency plan implementation are addressed in the procedures noted below.

3.0 EMERGENCY COORDINATORS

This Plan identifies a primary emergency coordinator and alternate emergency coordinators as indicated in Attachment CP-1. The individuals identified are familiar with all aspects of PFF operations, trained in Contingency Plan implementation, and are capable of making appropriate decisions under emergency circumstances. The primary and alternate emergency coordinators have the authority to commit the resources of PFF required to implement the Plan. The emergency coordinators have the authority to shut down and restart processing areas and evacuate plant personnel. An emergency coordinator will be able to reach the Facility in a short period of time, should it be necessary to respond after regular business hours. If the evacuation of surrounding areas is advisable as determined by the Emergency Coordinator, immediate notification will be made to appropriate local authorities and the Emergency Coordinator (or his/her designee) will be available to assist appropriate officials decide whether surrounding areas should be evacuated.

4.0 IMPLEMENTATION

The Plan will be implemented whenever an incident or emergency at the Facility threatens or has the potential to threaten human health, the environment, and public or private property. The designated emergency coordinator will implement the Plan in the event of an imminent or actual emergency. The emergency coordinator will also provide coordinated assistance to the internal personnel and outside organizations responding to the emergency incident. Criteria for implementation of the Contingency Plan at the Facility include the following scenarios and potential emergencies:

4.1 Fires and/or Explosions

- A large fire has been discovered and the fire is not extinguished using portable fire extinguishers;

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- Facility personnel have exhausted locally available fire extinguishers on a small fire and the fire continues to burn or spread;
- A fire causes the release of toxic fumes affecting the surrounding area;
- Use of water or chemical fire suppressant could result in contaminated runoff;
- An imminent danger of an explosion exists; and/or,
- An explosion has occurred.

4.2 Spills or Releases

- A spill exceeds the size or seriousness that can be controlled and remediated by Facility personnel using portable equipment available in the immediate area of a spill or release; and/or,
- A spill or uncontrolled reaction has caused or could cause the release of hazardous waste or hazardous waste constituents to the air, surface water, or soil.

4.3 Natural Disasters

A hurricane, tornado, or severe weather event is forecast for the immediate area of the Facility or has occurred at the Facility.

4.4 Bomb Threat

A bomb threat concerning the Facility is received by Facility personnel or by other persons who make the event known to Facility personnel.

4.5 Emergency Response Procedures

4.5.1 Notification

Facility personnel will immediately notify the emergency coordinator by telephone or intercom when an actual or imminent emergency is identified. If the emergency occurs after regular business hours, the emergency coordinator (or designated alternate) will be immediately notified using the telephone numbers listed in the Emergency Coordinator Contact List (Attachment CP-1).

The Gainesville Police and Fire Department can be summoned by telephone. Telephones that are configured for dialing an outside line can be activated by dialing “9” for external communication. Telephones are located inside each building containing hazardous waste and are also capable of facility-wide notification on a dedicated paging system.

Additionally, all emergency coordinators have the capability to maintain contact by radio to key members of the process technician team. Copies of the Contingency Plan, which contains the Emergency Coordinator Contact List, are posted in several areas of the Facility in hard cover binders in close proximity to processing, storage, and certain administrative areas.

4.5.2 Identification of Hazardous Materials

As a precaution, all hazardous waste received by PFF is assumed to be ignitable and toxic. All smoke and fumes from fires and explosions will be assumed to be hazardous. The atmosphere around all spills will be assumed to be toxic and potentially reactive until determined to be otherwise. The

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emergency coordinator(s) or his/her alternate will make an inspection of the material(s) involved in an incident and determine the next course of action.

Whenever there is a release, fire, or explosion, the emergency coordinator(s) will (to the extent possible) immediately identify the character, source, amount, and aerial extent of any released materials. He/she may do this by visual observation (e.g., truck placards, container labels), review of facility records, and (if necessary) by chemical analysis. Facility records available for review include manifests, and waste analysis data on-site kept at the file cabinets in the hallway next to the copy room for at least three years, and then kept off-site with Iron Mountain at 5905 NE Waldo Road, Gainesville, Florida. Iron Mountain provides contracted service to archive the documents. The emergency coordinator may consider incident character (i.e., size of spill or type of incident) as well as weather conditions when coordinating response actions.

4.5.3 Hazard Assessment

As part of the Facility training program, Facility personnel are trained to assess the potential emergencies for which they have the capacity to respond. Facility personnel are trained in the use of locally available fire extinguishers and control equipment for minor spills. If more serious events are immediately recognized, or the event exceeds the capabilities of portable extinguishing or spill control equipment, the emergency coordinator will notify local authorities and activate the on-site fire alarm. Upon arrival of the local authorities, the emergency coordinator will provide information regarding the Facility and available materials to prevent the spread of contamination. The local fire or emergency response official, upon arrival at the Facility, shall have primary control and authority during an emergency situation at the Facility.

The need for partial or full evacuations of the Facility and surrounding areas will be assessed by the emergency coordinator and outside emergency agency personnel.

The affected employees' supervisor will assess medical emergencies. Either the Facility's local medical provider or a local emergency medical facility will treat any employee who is injured to the extent where the injury cannot be remedied by simple first aid.

Bomb threats will be treated as actual emergency events until determined otherwise. The Gainesville Police Department will make further assessments and recommendations to the Facility emergency coordinator.

The emergency coordinator has the authority to notify additional PFF employees as deemed necessary to broaden his/her capability in making assessments by utilizing trained personnel and specialized tools and equipment available to assess the extent and severity of an incident including:

- Photo-ionization detector
- Gas chromatograph
- Mass spectrometer
- Additional miscellaneous lab instruments

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The emergency coordinator, or an individual he/she designates, will assess the potential environmental effects of an incident using the following criteria:

- Potential effects of gases, vapors, and smoke.
- Potential effect of water run-off from fire control.
- Potential effect of fire-fighting foams or chemicals.
- Potential effect on local surface water or groundwater.
- Potential effect on human and animal health or life; inside and outside the facility.

4.5.4 Control Procedures

4.5.4.1 Fire and Explosion

Facility employees are trained in fire prevention and response. Employees are trained to respond to small fires with portable fire extinguishers. The Gainesville Fire Department will respond to structural or large fires. In addition, the entire facility is covered by an on-site fire suppression system supported by a diesel fire pump that feeds an array of wet and dry pipe systems and can distribute an AFFF foam/water mixture at the NFPA-required densities in any of the Facility's waste storage and processing areas. This system is monitored 24 hours a day and also has backup power to maintain all functionality in the event of AC power failure, in accordance with local and NFPA guidelines. Specific instructions for responding to a fire and explosion at PFF are contained in Attachment CP-2A, Emergency Procedures for Fire, and in Attachment CP-2B, Emergency Procedures for Explosion, respectively.

In the event of fire or explosion, the following actions will be immediately taken:

1. All work will cease, and all non-essential personnel will be evacuated to the designated assembly area.
2. All valves and conveyance systems in the LSV processing area that lead to the 3,000-gallon aboveground storage tank and those in the treatment area will be secured. All loading, processing, and unloading operations of the PF-I system, PF-II system, or other site operations in the affected area will be shut down.
3. The emergency coordinator(s) and local authorities will be notified.

4.5.4.2 Minor Spills

Minor spills may occur during waste sampling, equipment maintenance, waste transfer, and treatment operations. Waste is managed throughout the Facility within secondary containment structures. Therefore, minor spills have minimal potential for off-site migration to the local environment. In most cases, these spills occur where adequate ventilation is present to dissipate any harmful vapors. These spills can generally be remediated using absorbent pads or materials.

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4.5.4.3 Major Spills

Major spills may result from overturned containers or ruptures in the storage tank, containers, piping, or hoses. Secondary spill containment has been installed around hazardous waste treatment process areas and storage locations within the Facility.

Specific instructions for responding to a spill or unplanned release at the Facility are contained in Attachment CP-3, Emergency Procedures for a Spill/Unplanned Release. Attachment CP-3 includes a step-action table that summarizes those activities that should be taken immediately upon the discovery of a spill or release in any one of the process areas (e.g., LSV processing, PF-I, PF-II, or other treatment areas on site).

4.5.4.4 Natural Disasters

The most probable natural disasters to affect the Facility would be either a tornado or a hurricane. Warnings of approaching tornadoes and tropical storms/hurricanes will be received from the National Weather Service or local media. A NOAA emergency weather radio is kept in the offices and monitored during business hours for this purpose.

With tornadoes, there is usually little time to make preparations. The only emergency action that can be taken during a tornado warning is to have all employees move to the center of the building they are in. All employees working outside (e.g., in the PSB), will be notified and required to move inside to a safer location.

Early warning is possible with tropical storms/hurricanes. If it becomes apparent that a tropical storm or hurricane may impact the Facility, the following tasks will be completed:

- Daily entries to the operating record will be made documenting the path/progress of the storm. This will include storm-tracking maps from weather agencies, written warnings from weather services, etc.
- If the forecast predicts a tropical storm or hurricane force winds (>39 miles per hour) for the Facility, the following steps will be taken:
 - All double-stacked pallets of drums in the PSB will be placed on the floor.
 - Any empty B-25 containers on site will be placed around the outside of the PSB berm to minimize damage caused by flying debris during high winds.
 - All outside roll-off containers will be inspected to verify that covering tarps are secure.
 - Containers subject to wet weather damage will be covered in plastic (e.g., fiber containers) or moved inside the LSV Storage warehouse.
 - Any equipment/supplies and other loose objects outside the main buildings will be brought inside, such as empty drums, over-packs, forklifts, spill kits, etc.
 - Maintenance will verify that the emergency power generator and portable pumps are serviced and ready for use.

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- Emergency response equipment (respirators, protective clothing, gloves, etc.) that might be needed to respond to a spill/fire/release will be placed in a location easily accessible to responders, such as under the front stairwell.

After the event is over and it is safe to go outside, emergency coordinators will tour the facility to evaluate damage, if any, and implement the Contingency Plan as needed.

4.5.4.5 Bomb Threats

All bomb threats will be reported to the emergency coordinator or company officials and subsequently to the Gainesville Police and Fire Departments. The Facility will be evacuated, and local authorities may conduct a bomb search. The Facility will remain unoccupied until the local authorities and emergency coordinators determine the threat no longer exists.

4.5.4.6 Power or Equipment Failure

In the event of a power failure, all transfer pumps and treatment operations will stop. Existing automatic valves inherent in the design of the fluid transfer pumping equipment prevent reversal of flow in the LSV transfer lines. The container storage facilities and conveyors in the LSV area are not rendered unsafe during a power failure. The emergency coordinator(s) and Facility maintenance personnel will survey potential damage resulting from a loss of power. Equipment will be repaired immediately after power is restored or as soon as possible. If equipment is beyond repair, it will be properly disposed or managed as scrap.

No run-away reactions will occur as a result of suspension of the PF-I process. Equipment damage would not be anticipated as a result of a power outage.

In the event of a power failure, all operations in the PF-II process line will be discontinued. The system is manually loaded and unloaded so backflow or unintended unloading of material will not occur. The process line (including the heating system) will automatically shut off and is not configured to automatically restart (i.e., in the event of a power failure, upon system shut-down, manual operator action is required for reactivation of equipment). Power failure will not be a factor for container treatment operations since these operations are manually operated. Therefore, in the event of a power failure, the process will be shut down, and all container(s) will be closed until safe processing can be resumed. No other facility operations are anticipated to potentially result in safety or damage problems if interrupted by a power outage.

Emergency exit signs and lighting are provided at critical locations throughout the facility and are supplied with battery-backup power units providing up to 90 minutes reserve power. The Facility is not equipped with automatic emergency backup generators. However, a portable gas-powered electric generator is located on site.

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Equipment failure and malfunction will be recorded in the operating record. Maintenance personnel will check and repair malfunctioning equipment as needed. Equipment and instrument calibration will be performed as needed by qualified individuals to minimize the potential for equipment failure, or use of equipment in an “out of calibration” condition. The facility inspection schedule and inspection log sheets provide a mechanism for inspection of tanks and accessories and minimizes the potential for equipment failure and potential releases to the environment. Most equipment failures would not result in any release of hazardous constituents to the environment. In addition, storage and treatment areas are provided with secondary containment systems designed to prevent migration of released materials to environmental media. In the event that equipment failure results in a release, the incident response procedures outlined in this Contingency Plan are designed to address the most likely possible scenarios.

5.0 PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, OR RELEASES

In the event of a fire, explosion, or release, transfer pumps, electric motors, heating units, mixing equipment and other equipment items will be shut off to eliminate the possibility of recurrence. The emergency coordinator shall institute this as necessary. The storage tank is equipped with a high-level alarm system to prevent overfilling. The proper functioning of this system also will mitigate the possibility of a recurrent emergency situation. The automatic power shut-off system for the PF-II process line will minimize the potential for recurrence of any fire, explosion, or release.

Plant personnel will tour affected areas of the Facility every two hours, inspecting for possible recurrences of fire or material release until the “all clear” determination has been announced.

6.0 STORAGE AND TREATMENT OF RELEASED MATERIAL

If PFF halts operations in response to a fire, explosion, or release, the emergency coordinator must monitor for potential leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever appropriate.

Immediately after an emergency, the emergency coordinator must provide for the treatment, storage, or disposal of recovered waste, contaminated soil, or surface water, or any other material that results from a release, fire, or explosion at the Facility. If the recovered material cannot be processed on-site, it will be characterized and disposed of properly in an approved off-site hazardous or non-hazardous waste management facility, as applicable. Collected waste, contaminated soil/surface water, or other material resulting from release response will be stored in a designated storage area (prior to treatment on-site or shipment off-site) based on the identity of the waste and conditions at the Facility. In most cases, the material will be containerized and stored in container storage areas used for management of the original waste. If incident conditions preclude storage in standard storage areas, temporary areas will be designated in accordance with the requirements of 40 CFR 262.34. In some cases, liquid waste may be collected directly onto a tanker and shipped off-site for proper disposal.

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7.0 EMERGENCY EQUIPMENT

A list of emergency equipment available on-site is provided in Attachment CP-5, Emergency Equipment List. Locations of the facility's emergency equipment are shown on CP-6, Emergency Equipment Locator Map. Available equipment includes fire extinguishers, portable pumps, forklift, empty containers, shovels, brooms, and absorbent.

The emergency coordinator will supervise Facility personnel in the cleanup and treatment of hazardous wastes after the emergency is mitigated. If an outside emergency response/cleanup contractor is required, the emergency coordinator will interface with the outside contractor to ensure proper response or cleanup in accordance with procedures in the Contingency Plan and with Facility permits and licenses.

Corrosive materials will be neutralized in place, then absorbed and containerized. All others will be absorbed (if liquid) and containerized, followed by waste characterization, and, if necessary, analysis and shipment off-site for disposal. Large volumes of liquids may be pumped into containers or tanker trucks for appropriate management.

8.0 INCOMPATIBLE WASTE

The emergency coordinator will ensure that (in the affected area(s) of the Facility) no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed. Depending on the situation, this may require isolation of certain classes of material on-site, or loading and shipping certain classes of material off site.

9.0 POST-EMERGENCY EQUIPMENT MAINTENANCE

All emergency equipment listed in Attachment CP-5 and used during an emergency will be replenished or cleaned and inspected for integrity before operations are resumed.

After an incident, non-disposable emergency equipment listed in this Contingency Plan will be cleaned and made fit for its intended use before operations are resumed. Equipment used for emergency response will be decontaminated by steam cleaning, water washing, or other appropriate method. Used fire extinguishers will be re-charged, and depleted supplies will be restocked. Appropriate decontamination methods will be chosen based on the manufacturer's recommendation and/or the type/quantity of contamination present. Disposable equipment will be properly managed, and decontamination residues will be managed in accordance with 40 CFR 262.34.

10.0 CONTAINER SPILL AND LEAKAGE

Leaking containers will be overpacked into non-leaking secondary containers until processed; or the material in the leaking container will be transferred into another appropriate DOT container. No attempt will be made to repair leaking containers. Waste that leaked from a container will be absorbed and managed and disposed of appropriately.

The PF-I and PF-II processes will be conducted in an area equipped with secondary containment. Debris treatment, as well as container treatment activities, is conducted within secondary containment. Spills will be managed in the same manner as tank releases discussed below. Incidental spills will be removed from

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containment upon detection. Containment areas are subject to routine inspections to facilitate the detection of and timely response to leaking containers or accumulated liquids.

11.0 TANK SPILLS AND LEAKAGE

The bulk storage tank at the Facility is located within secondary containment. Spills will be absorbed and managed as hazardous waste for proper disposal. If the tank itself develops a leak, the remaining waste will be pumped from the tank into containers, or directly into a tanker truck. The tank will then be assessed by a Florida registered professional engineer and either repaired or closed in accordance with the approved closure plan contained in the Facility's Part B permit.

The PF-II system is also equipped with secondary containment. Spills will be managed in the same manner as tank releases discussed above. Incidental spills will be removed in a timely manner. Additionally, these areas are subject to routine inspections to facilitate the detection of and timely response to leaking containers or accumulated liquids.

12.0 COORDINATION AGREEMENTS

Arrangements have been made with the following state and local authorities to provide emergency assistance to the facility:

<u>NAME OF ORGANIZATION</u>	<u>FUNCTION</u>
• City of Gainesville Fire and Rescue Department	• Respond to fires, explosions, spills, or releases
• City of Gainesville Police Department	• Primary responder for plant security & traffic control
• Alachua County Sheriff's Office	• Secondary responder for plant security & traffic control
• North Florida Regional Medical Center	• Emergency medical treatment
• State of Florida DEP Emergency Response Unit	• Assist in emergency response coordination efforts

Coordination agreements are intended to document each emergency response organization's ability and willingness to assist the PFF facility in the event of an emergency incident.

Complete copies of the Plan after approval from FDEP will be sent to the local police and fire departments, nearby hospital, emergency response contractor, and state and local emergency response teams to familiarize them with the Facility and those actions needed in case of an emergency. Documentation indicating that copies of the previous plans have been submitted to these organizations is maintained in the Facility Operating Record. Also, documentation of each organization's acceptance or refusal to enter into a coordination agreement is maintained in the Facility Operating Record. Example copies of these documents are provided as Attachments CP-9 and CP-10, respectively. In addition, the local hospital has been advised about the properties of hazardous waste handled at the facility and the types of injuries/illnesses that could result from fires, explosions, or releases at the facility.

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Whenever the Plan is amended, copies of the amendments will be provided to these organizations. The invitation for site inspections will be offered whenever there are significant changes to Facility operations, or annually.

13.0 COORDINATION OF EMERGENCY SERVICES

This section of the Contingency Plan identifies outside organizations that are available for emergency response services. Written agreements with these organizations are maintained in the Facility operating record. These service agencies and organizations are to be summoned only by the PFF emergency coordinator or his/her alternate.

The following table summarizes those notifications and actions that should be undertaken in response to emergency situations that could arise at the Facility.

<u>IN CASE OF A</u>	<u>THEN NOTIFY*</u>	<u>SIMULTANEOUS ACTIONS</u>
<ul style="list-style-type: none">• Fire or Explosion	Gainesville Fire Rescue Department Call 911, or (352) 334-5078	<ul style="list-style-type: none">• Evacuate Facility employees to assembly location• Take attendance for missing persons• Emergency coordinator assists ranking Fire official
<ul style="list-style-type: none">• Release of harmful or toxic gases or fumes	Gainesville Fire Rescue Department Call 911, or (352) 334-5078	<ul style="list-style-type: none">• Evacuate Facility employees to upwind assembly location• Take attendance for missing persons• Emergency coordinator assists ranking Fire official

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<u>IN CASE OF A</u>	<u>THEN NOTIFY*</u>	<u>SIMULTANEOUS ACTIONS</u>
<ul style="list-style-type: none"> Spill or release of hazardous materials or hazardous wastes 	Local Hazardous Materials Response Team (Gainesville Fire Rescue HAZMAT Team) Call 911, or (352) 955-1818 <u>OR</u> North Central Florida Regional Planning Council (352) 955-2200 <u>OR</u> Florida DEP State Warning Point (800) 320-0519 or (850) 413-9911 (24 hours)	<ul style="list-style-type: none"> Evacuate Facility employees to Assembly Location (as required) Take attendance for missing persons (if required) Emergency coordinator(s) evaluate the situation and potential hazards Either coordinate in-house spill response (minor spills) <u>or</u> contact outside responders (major spills).
<ul style="list-style-type: none"> Bomb threat or unauthorized trespass 	Gainesville Police Department Call 911, or (352) 334-2400 <u>OR</u> Alachua County Sheriff's Office Call (352) 955-1818	<u>BOMB THREAT</u> <ul style="list-style-type: none"> Evacuate Facility employees to assembly location Take attendance for missing persons Emergency coordinator assists ranking police official <u>TRESPASS</u> <ul style="list-style-type: none"> Emergency coordinator & operations personnel check for tampering, theft, etc. Resecure Facility
* Written reports and additional agency notifications may be required beyond those emergency notifications listed above (e.g., RQ report, or hazardous waste tank release, etc.).		

14.0 EVACUATION PLAN

Potential emergencies requiring evacuation from hazardous waste management areas are primarily fire hazards and the associated potential release of toxic, irritating, or asphyxiating gas/fumes, or bomb threat. In either case, Facility employees will execute the procedures listed below.

All employees are trained in evacuation procedures. Periodic evacuation drills are conducted to familiarize facility personnel of the primary and secondary evacuation routes and assembly locations throughout the Facility. Evacuation routes are shown on Attachment CP-7, Emergency Evacuation Route Map.

Criteria for implementation of the Facility evacuation plan include the following scenarios and potential emergency situations:

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14.1 Fire and Explosion

All Facility employees are trained in the Facility's evacuation plan procedures in the event of a fire or explosion. Employees are instructed to evacuate the Facility using either primary or alternate emergency evacuation routes, as instructed. Employees shall remain at the assembly location until the ranking fire official and/or emergency coordinator have given clearance, unless conditions warrant an off-site evacuation.

14.2 Release of Toxic, Irritating, or Asphyxiating Gases or Fumes

A remote possibility exists for the release of gases or fumes that may cause toxic, irritating, or asphyxiating effects on Facility employees. Employees are instructed to evacuate the Facility and proceed to the designated assembly point for attendance counts. If the primary evacuation routes and assembly point are unusable due to encroaching gases or fumes, employees shall use the secondary evacuation routes and assembly point, depending on wind direction or dispersal of fumes or gases. Employees shall remain at the assembly location until clearance has been given by either the emergency coordinator or ranking emergency official, unless conditions warrant an off-site evacuation.

14.3 Bomb Threat

If a bomb threat is received by the Facility, all employees are instructed to evacuate the Facility via either primary or secondary evacuation routes. All employees will evacuate and proceed to either the primary assembly area or a secondary assembly area designated by the emergency coordinator for an attendance count. Employees shall remain at the assembly location until the ranking police official or the emergency coordinator has given clearance.

14.3.1 Procedure Signals:

An internal announcement is broadcasted using the telephone public address system. All personnel and employees are instructed to evacuate the Facility through the front door or closest exit.

- The emergency coordinator or designee will make the announcement by dialing 80 (eight zero) on the telephone and saying:
“**ATTENTION!!** THE PERMA-FIX EMERGENCY EVACUATION SYSTEM IS NOW BEING EXECUTED. A SITUATION EXISTS REQUIRING IMMEDIATE EVACUATION OF THE FACILITY. PLEASE CALMLY EXIT THE FACILITY AND ASSEMBLE AT THE DESIGNATED AREA.”
- The emergency coordinator(s) shall direct the evacuation. In the event of an issue of accountability, and if conditions allow, the emergency coordinator(s) shall re-enter the Facility to locate personnel. While emergency coordinators are inside the perimeter of the Facility, they shall maintain radio contact with other emergency coordinators and the head counter at all times.
- In a situation that does not warrant re-entry by PFF emergency coordinators, entry of the Facility shall be performed by the local emergency response authorities, with their findings communicated to on-site PFF emergency personnel.

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- Primary evacuation routes have been established and are depicted on Attachment CP-7, Emergency Evacuation Route Map. Additionally, secondary evacuation routes have been established in order to provide employees with an alternate route to the assembly location so that an attendance count may be taken. Secondary routes are utilized in the event that primary routes are unusable due to fire, heat, smoke, fumes, or asphyxiating gases. Attachment CP-8 illustrates the areas where potential facility hazard locations could exist.
- Evacuation Route Maps are posted at strategic locations throughout the Facility to guide employees to assembly location by illustrating the established primary and secondary evacuation routes.
- Upon complete evacuation of the Facility, all employees will immediately assemble in the parking lot adjacent to the east side entrance (or alternate assembly location) as directed by the emergency coordinator. In the event that toxic or irritating gases are generated, the emergency coordinator shall direct further evacuation from the area to a safe upwind location. Authorized emergency response personnel remaining in the area will be required to don appropriate personal protective equipment.
- The head counter or designee shall account for all PFF and non-PFF personnel by using a current employee list and sign-in roster, and shall communicate by radio to the emergency coordinator(s) when an issue of accountability exists. The radio is located by the downstairs fax machine in the office area. (VERIFY RADIO IS SET TO CHANNEL 2.) When all personnel have been accounted for, the head counter will then report personnel accountability to the emergency coordinator(s).
- All employees will remain at the assembly point location until instructed otherwise by the emergency coordinator or outside authority.
- The emergency coordinator will advise the appropriate responding agencies if there is a need for the evacuation of the surrounding area.

15.0 REQUIRED REPORTS

The time, date, and details of any incident that requires implementation of the Plan will be documented and kept in the Facility operating log. Within 15 days after an incident, a written report will be submitted to the FDEP. The report will include:

- (1) Name, address, and telephone number of the owner or operator;
- (2) Name, address, and telephone number of PFF;
- (3) Date, time, and nature of incident (e.g., fire, explosion);
- (4) Name and quantity of material(s) involved;
- (5) The extent of injuries, if any;
- (6) An assessment of actual or potential hazards to human health or impacts to the environment, where applicable; and,
- (7) Estimated quantity and disposition of recovered material that resulted from the incident.

In case of occurrence of a fire or explosion from the facility that could threaten the environment or human health outside the facility, it will be reported verbally to the FDEP within 24 hours, and a written report will be provided within 5 days, as required by 62-4.160.17(b), F.A.C. The verbal report will include the name,

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address, I.D. number, and telephone number of the facility; its owner or operator; the name and quantity of materials involved; the extent of any injuries; an assessment of actual or potential hazards; and the estimated quantity and disposition of recovered material. The written submission will contain:

1. A description and cause of the fire or explosion at the facility.
2. If not corrected, the expected time of correction, and the steps being taken to reduce, eliminate, and prevent recurrence of the fire or explosion.

The Plan will be reviewed and immediately amended, if necessary, whenever:

- The Plan fails in an emergency;
- The list of emergency equipment changes;
- Changes occur in the Facility's design, construction, operating, maintenance, or other circumstances that materially increase the potential for fires, explosions, or releases of hazardous waste, or changes, the response necessary in an emergency;
- The list of emergency coordinators changes; or,
- The Facility permit is revised.

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FIGURE CP-1
SITE PLAN

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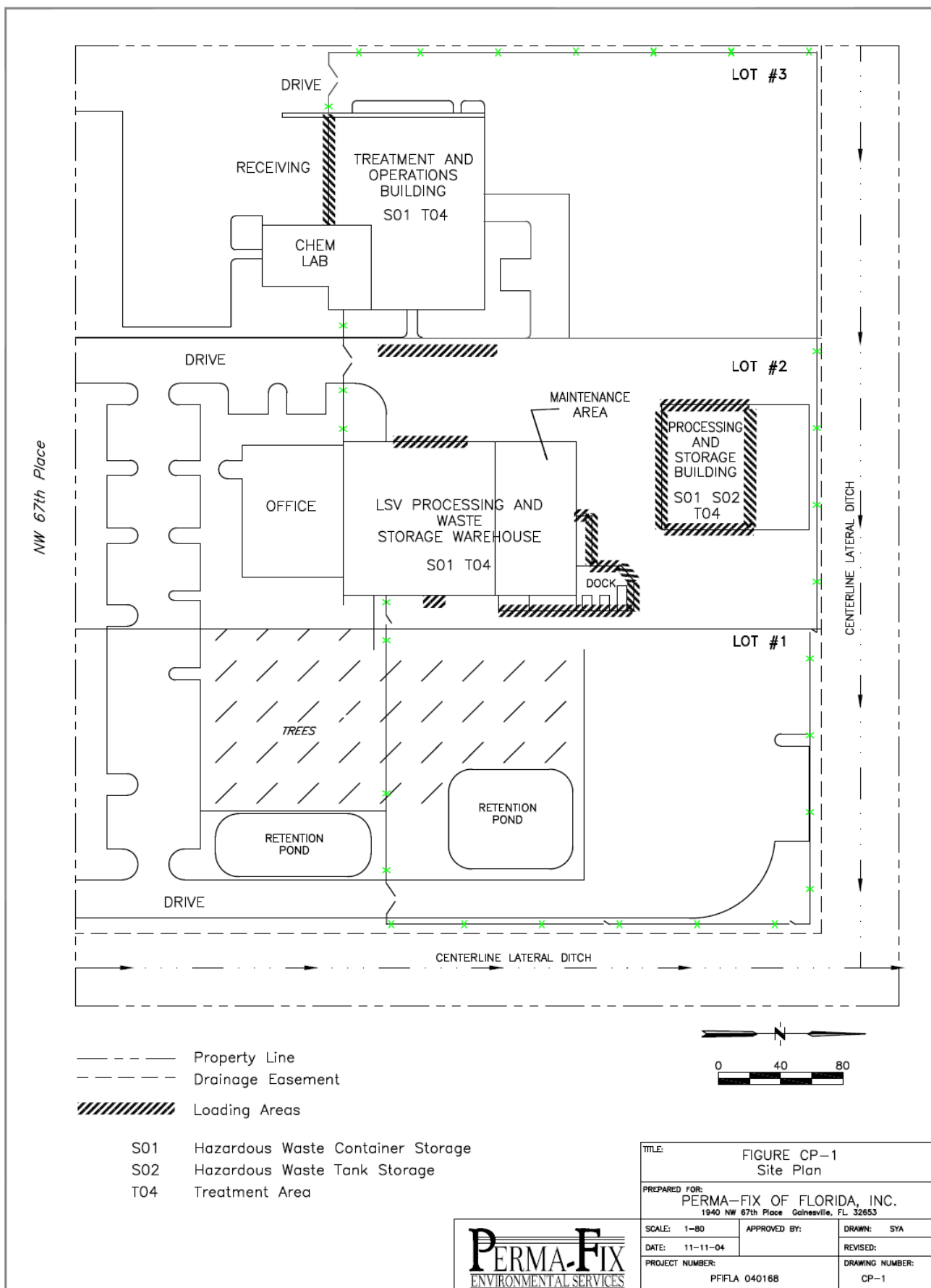


FIGURE CP-2
STREET MAP

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ATTACHMENT CP-1
EMERGENCY COORDINATORS

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**ATTACHMENT CP-1
EMERGENCY COORDINATORS****Primary Emergency Coordinator**

Name:	Randy Self
Position/Title:	Treatment Coordinator
Work Telephone Number:	(352) 395-1368/373-6066
Home Telephone Number:	(352) 301-5336
Mobile Telephone Number:	(352) 317-3243
Zip Code for Home Address:	32606

Alternate Emergency Coordinators*

Name:	Dwayne Singleton
Position/Title:	Industrial Coordinator
Work Telephone Number:	(352) 395-1362/373-6066
Home Telephone Number:	(352) 376-9624
Mobile Telephone Number:	(352) 219-8640
Zip Code for Home Address:	32606

Name:	Raymond Whittle
Position/Title:	General Manager
Work Telephone Number:	(352) 395-1353/373-6066
Home Telephone Number:	(904) 964-7475
Mobile Telephone Number:	(904) 364-7057
Zip Code for Home Address:	32091

Name:	Andy Owens
Position/Title:	Quality Assurance Manager
Work Telephone Number:	(352) 395-1357/373-6066
Home Telephone Number:	(352) 373-2166
Mobile Telephone Number:	(352) 284-8064
Zip Code for Home Address:	32641

Name:	Mike Owens
Position/Title:	Maintenance Coordinator
Work Telephone Number:	(352) 395-1360/373-6066
Home Telephone Number:	(904) 684-3108
Mobile Telephone Number:	(386) 937-6770
Zip Code for Home Address:	32148

Name:	Kurt Fogleman
Position/Title:	Environmental Health & Safety Manager
Work Telephone Number:	(352) 395-1356/373-6066
Home Telephone Number:	(352) 331-6221
Mobile Telephone Number:	(352) 222-8032
Zip Code for Home Address:	32606

Name:	Tristan Timm
Position/Title:	Radiation Safety Officer
Work Telephone Number:	(352) 395-1345/373-6066
Mobile Telephone Number:	(352) 228-1556
Zip Code for Home Address:	32605

* Alternate Coordinators are listed in the order in which they will assume responsibility as alternates.

NOTE: The work address for all Coordinators is 1940 NW 67th Place, Gainesville, Florida 32653.

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ATTACHMENT CP-2A
EMERGENCY PROCEDURES FOR FIRE

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ATTACHMENT CP-2A EMERGENCY PROCEDURES FOR FIRE

The following actions should be taken upon discovery of a fire anywhere within the Facility's processing areas.

STEP	ACTION	
1	Sound alarm using the intercom and by word of mouth, and quickly evaluate the extent of the emergency. The alarm should alert the emergency coordinator. If after hours, contact primary or alternate emergency coordinator using phone numbers in Attachment CP-1 posted by phone.	
2	If the situation allows it, actuate the kill switch to disconnect the power to all process equipment. This should stop the flow of potentially ignitable and/or reactive materials. Lights should remain on inside the process area.	
3	Follow the specific instructions of the emergency coordinator who will direct any internal efforts to contain, control or extinguish the fire, if the emergency coordinator is present.	
4	If the primary or alternate emergency coordinator is not present, attempt to contain the fire as follows; otherwise, the primary or alternate emergency coordinator will conduct evaluation:	
	If the fire is a...	Then respond by following these steps...
	Large fire (i.e., it cannot be extinguished without outside assistance)	a Call the Fire Department – 911
		b The primary or alternate emergency coordinator should contact the following as necessary: <ul style="list-style-type: none"> Gainesville Police Department 911 Gainesville Fire Rescue Department (352) 995-1818
		c Evacuate personnel from the affected area to the designated evacuation assembly area.
		d Prevent entry into affected area if it would jeopardize the safety of an employee
		e If the situation allows it, prevent the spread of fire beyond the immediate area using fire extinguishers until outside assistance arrives.
		f Follow directions given by ranking fire official.
		g Close appropriate valve on the storm water outfall(s), or use absorbent materials or mechanical means to prevent any contaminated fire-fighting water from exiting the facility, if it is safe to do so.
		h If hazardous materials are involved in the fire, provide the MSDS or chemical information for the materials to the Fire Department.
		i After the fire is extinguished, the emergency coordinator should evaluate the situation and determine whether an emergency response contractor is needed for environmental cleanup.
		j Collect all contaminated absorbents in containers, and close and label the containers. Contained liquids may be pumped into a tank truck or containers.
		k Resume operations only after the Fire Department and emergency coordinator have made a full inspection and have determined that the area is fit for restarting operations.
		l Make proper notifications and prepare a written report regarding the incident.

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ATTACHMENT CP-2A (continued)

STEP	ACTION		
	If the fire is a...		Then respond by following these steps...
	Small isolated fire (i.e., one that can be extinguished without outside assistance)	a	Attempt to use fire extinguishers to control the fire.
		b	Use dry chemical, foam, or CO ₂ fire extinguishers for fighting fires. Do not use water on electrical fire or liquid fires. <ul style="list-style-type: none"> • Class C extinguishers: For use on electrical fires • Class B extinguishers: For use on flammable liquid fires.
			c Direct the stream from the extinguisher at the base of the fire from upwind and the sides. Do not stand downgradient of the fire.
		d	If the scope of the incident exceeds the capabilities of the portable fire extinguishers, activate dedicated fire suppression system.
		e	If efforts to extinguish the fire are not immediately effective, the emergency coordinator should contact the following as necessary: <ul style="list-style-type: none"> • Gainesville Police Department 911 • Gainesville Fire Rescue Department (352) 955-1818
			f After the fire is extinguished, the emergency coordinator must conduct an inspection before resuming operations.
		g	Prepare a fire report.
5	Refer to Attachment CP-4 for reporting requirements (if applicable).		

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ATTACHMENT CP-2B

EMERGENCY PROCEDURES FOR EXPLOSIONS

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**ATTACHMENT CP-2B
EMERGENCY PROCEDURES FOR EXPLOSIONS**

The following actions should be taken if an explosion occurs at the Facility.

STEP	ACTION
1	Notify the Emergency Coordinator immediately if an explosion occurs at the facility. Also, provide any information pertaining to injury to employees, if available.
2	The Emergency Coordinator will notify the appropriate agencies listed in Attachment CP-5.
3	If it is safe to do so, retrieve any injured personnel and arrange for their medical help.
4	If the explosion has resulted in a fire, implement procedures listed in Attachment CP-2A.
5	If the explosion has resulted in a spill, implement procedures listed in Attachment CP-3.
6	Resume operations only after the Emergency Coordinator or his designee has made an inspection of the affected area(s) and has determined that the area(s) is fit for restarting operations.
7	Prepare a report on the explosion event.
8	Submit a written report, if applicable, to appropriate agencies listed in Attachment CP-5.

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ATTACHMENT CP-3
EMERGENCY RESPONSE PROCEDURES
FOR SPILL/UNPLANNED RELEASE

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ATTACHMENT CP-3 EMERGENCY RESPONSE PROCEDURES FOR SPILL/UNPLANNED RELEASE

Minor spills may occur during sampling, equipment maintenance, transfer, and treatment operations. In most cases, these spills will occur where adequate ventilation is present to dissipate any harmful vapors. These spills can generally be remediated using pads and absorbent materials.

Major spills may result from overturned containers or ruptures in storage tanks, containers, piping, and hoses. Secondary spill containment has been installed at hazardous waste process and storage areas. The following actions will be taken in the event of a spill:

Step	Action		
1	Communicate the spill event to others.		
2	Assess the extent and magnitude and source of the event.		
3	Shut down processing operations, if necessary.		
4	Assess immediate health and safety concerns. Evacuate area if necessary.		
5	Attempt to remediate the spill/release as follows:		
	If spill is a...	Then respond by following these steps...	
	Minor spill (<i>may occur during sampling, equipment maintenance...</i>)	a	Remediate using pads and absorbent materials.
		b	Collect all contaminated absorbent and place in closed and labeled container.
	If spill is a...	Then respond by following these steps...	
	Major spill (may result from overturned containers or ruptures in storage tanks, containers, piping, and hoses.)	a	Deny entry into any area that would jeopardize the safety of an employee.
		b	Sound alarm. The alarm should alert the emergency coordinator. If after hours, contact the primary or alternate emergency coordinator using phone number in Attachment CP-1.
		c	Follow the specific instructions of the emergency coordinator, including evacuation of the area (if required).
		d	If it is safe to do so, stop the flow of the released material by closing valves, shutting off pumps, or rotating or “overpacking” ruptured containers.
		e	All loading and transfer activities in the area are to be ceased.

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Step	Action		
		f	Contain the spill as much as possible using the following equipment: <ul style="list-style-type: none"> - Absorbent booms: Use these in tandem (one placed a few inches behind the other) to help control the flow of the material. - Use other absorbent materials: Use a commercial absorbent to soak up spills. - Empty 55-gallon drums can be turned on their sides and rolled to create an “instant” dike. - Use mechanical means: Ditch and shovels, if applicable.
		g	Close appropriate valve on the storm water outfall(s), or use absorbent materials or mechanical means to prevent the spilled material from exiting the facility, if it is safe to do so and the potential exists for spills to flow outside the facility.
		h	If there is a need for outside help, the primary or alternate emergency coordinator will contact the appropriate local authority, agency, or remediation contractor.
		i	Pump free liquids into containers or drums <u>or</u> tanker trucks.
		j	Collect all contaminated absorbent and place it in containers. Close and label containers.
		k	If directed by the Facility Radiation Safety Officer, survey all affected areas and materials for radiation.
		l	Begin equipment and area cleanup.
		m	Arrange for proper management of remediation waste.
		n	Complete a written description of the event while details are still fresh.
		o	Refer to Attachment CP-4 to complete reporting requirements, if applicable.
6	Notify local, state, and/or federal agencies listed in Attachment CP-4, as appropriate.		

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ATTACHMENT CP-4

EMERGENCY NOTIFICATION AND REPORTING INFORMATION

ATTACHMENT CP-4 EMERGENCY NOTIFICATION AND REPORTING INFORMATION

In the event of an emergency that could threaten human health or the environment outside of PFF, the General Manager or emergency coordinator shall immediately notify:

State of Florida Department of Environmental Protection

State Warning Point
1-800-320-0519 (24 hours)
or 1-850-413-9911 (24 hours)
and

Alachua County Environmental Protection Department
(352) 264-6800 (24 hours)

To report a release to the environment above the reportable quantity of a listed hazardous material, the PFF General Manager or emergency coordinator shall immediately notify:

National Response Center (NRC)

800-424-8802 (24 hours)

or

State Warning Point Number

1-800-320-0519
or 1-850-413-9911

If unsuccessful in reporting to the above numbers, call:

U.S. Environmental Protection Agency, Region 4, Atlanta, GA

Emergency Response Center
(404) 562-8700 (24 hours)

Within 15 days after the incident, send written report to:

State of Florida Department of Environmental Protection
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256
Attention: Northeast District Manager

The written report must be submitted to FDEP within 5 days in accordance with 62-4.160(17) if the emergency involves a fire or explosion at the facility that could threaten the environment or human health outside the facility.

ADDITIONAL OUTSIDE ORGANIZATIONS:

Police Departments:	Gainesville Police Department	911 (or 352-334-2400)
	Alachua County Sheriff's Office	911 (or 352-955-1818)
Fire & Rescue:	Gainesville Fire Rescue Department	911 (or 352-334-5078)
Hospital:	North Florida Regional Medical Center	352-333-4000
Local Emergency Planning Committee:	North Central Florida Regional Planning Council	352-955-2200
Outside Cleanup Contractor:	AAG Environmental	1-800-472-9251 352-472-7295
Florida DOH	Bureau of Radiation Control	407-297-2095

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ATTACHMENT CP-5
EMERGENCY EQUIPMENT LIST

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ATTACHMENT CP-5 EMERGENCY EQUIPMENT LIST

<u>Item</u>	<u>Description/Capability</u>	<u>Location(s)</u>
Telephone	Telephone communications for emergency notification	Waste Areas, Laboratory, and Other General Locations
Fire Extinguishers	Dry chemical, CO ₂ - extinguish fires	Throughout Facility, Admin & Processing
Fire Hydrant	Fire hydrant – combat fire	Southwest Corner of Process and Storage Building
Absorbent Material	Vermiculite and absorbent material in spill kits – absorbs liquid spills	Waste Treatment Areas, Container Storage and Tank Storage Areas
Respirators	Full-face chemical cartridge, Self Contained Breathing Apparatus (SCBA)	Waste Treatment Areas, Laboratory, Main Building Storage Areas
Eye Wash	Permanent installation and portable eye wash bottles/stations – flush eyes	Waste Treatment Areas, Laboratory
First Aid Kits	Band-Aids, bandages – provide minor first aid	Laboratories and Container Storage Areas
Fork Lift(s)	Multiple units: 5-, 6-, 15-thousand-pound capacity – assist in moving materials	Designated Equipment Parking Area Adjacent to PSB
Bobcat	Small, bucketed, material-handling machine	Outside Maintenance - West Side
Automatic Fire Suppression	Fire sprinkler system, AFFF system (in LSV PSB, TOB); wet sprinkler system through remainder of building areas	Entire Facility
Protective Apron & Gloves	Cloth, Tyvek, rubber, or nitrile – body protection	Waste Management Areas & Maintenance Area
Safety Glasses and Hard Hats	Personal protective equipment – issued to employees	All Operational Areas
Emergency Exit Lighting & Signs	Emergency egress equipment	Throughout Administrative Offices, Lab, Waste Management Areas

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ATTACHMENT CP-5 (CONTINUED)
EMERGENCY EQUIPMENT LIST

<u>Item</u>	<u>Description/Capability</u>	<u>Location(s)</u>
Portable Radios and/or Cellular Phones	Communication devices	Emergency Coordinators, Process Technicians
Spill Kit(s)	Clean up minor spills	Each Waste Management Area
Emergency Generator	Gas-powered generator – to provide electricity during emergency	Maintenance Area
Shovels, Brooms	To transfer spilled material manually into containers	Kept with Spill Kits, extras kept in Maintenance Shop
Empty Containers	To collect spilled material or PPE used during cleanup	On east side of LSV storage Warehouse
Portable Pumps	To transfer spilled liquids into containers or tanker trucks	Maintenance Area
Absorbent Booms	To prevent spills from entering surface waters or to absorb spilled material from the surface water	Mezzanine above LSV entry/exit Area
Field Monitoring Equipment (e.g., dosimeters, PID)	To assess an emergency and screen releases	Dosimeters in Radiation Lab; PID in office of the EHS Manager

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ATTACHMENT CP-6
EMERGENCY EQUIPMENT LOCATION MAPS

- A: Downstairs Offices and LSV Process Areas**
- B: Upstairs Offices**
- C: TOB (Nelson) Building**
- D: PSB Building**

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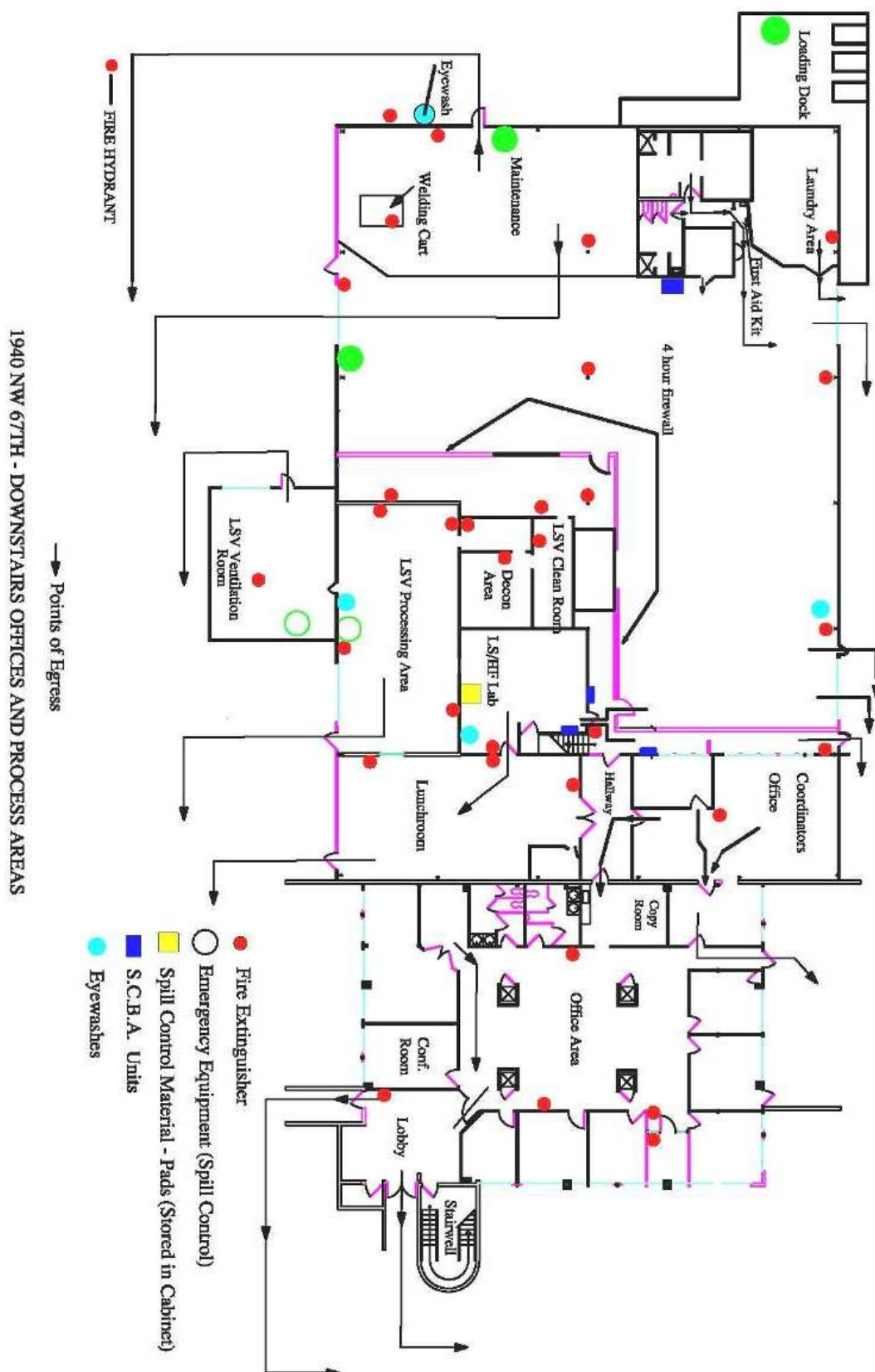
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A – DOWNSTAIRS OFFICES & LSV PROCESS AREAS MAPS

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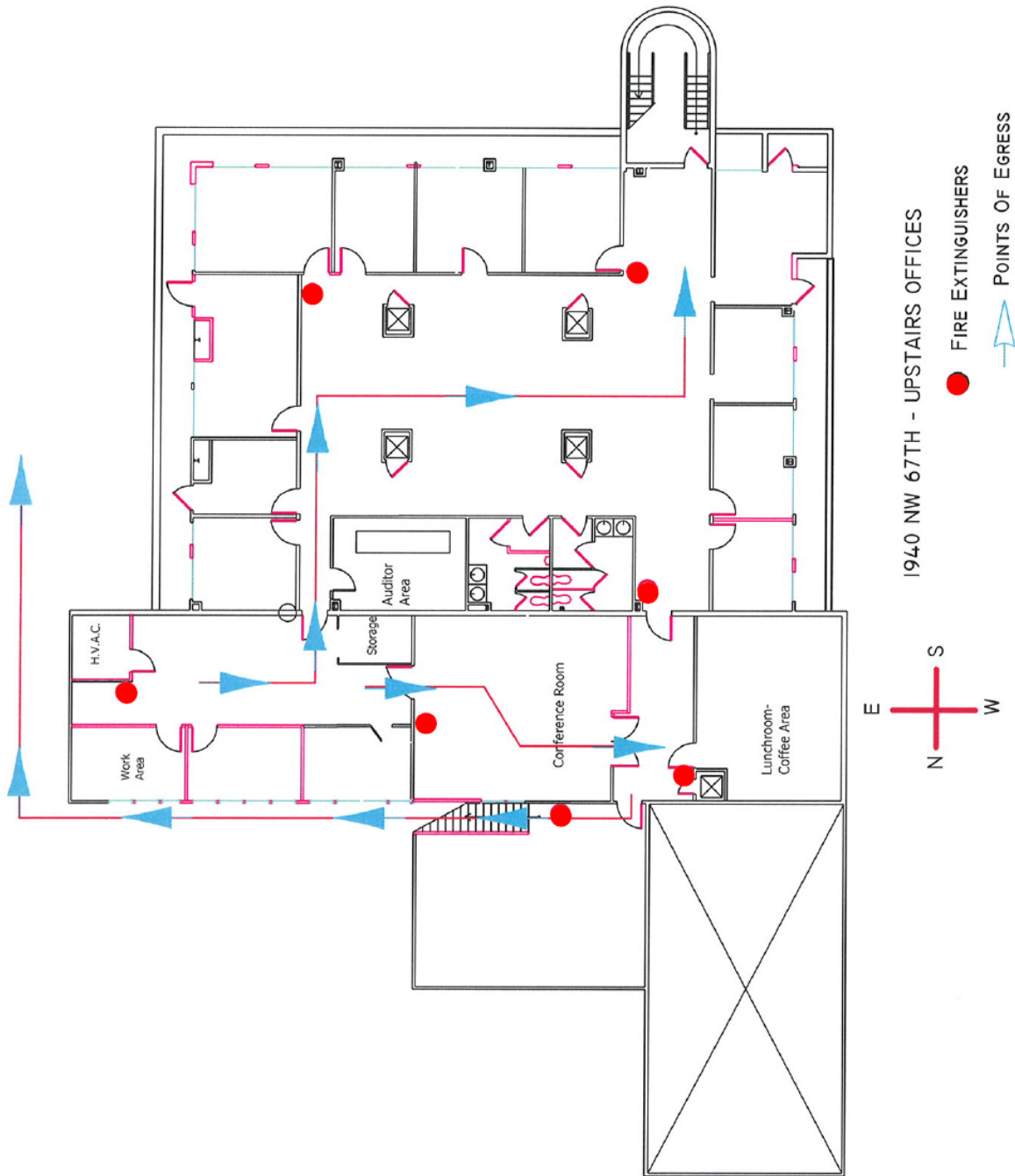
B – UPSTAIRS OFFICES

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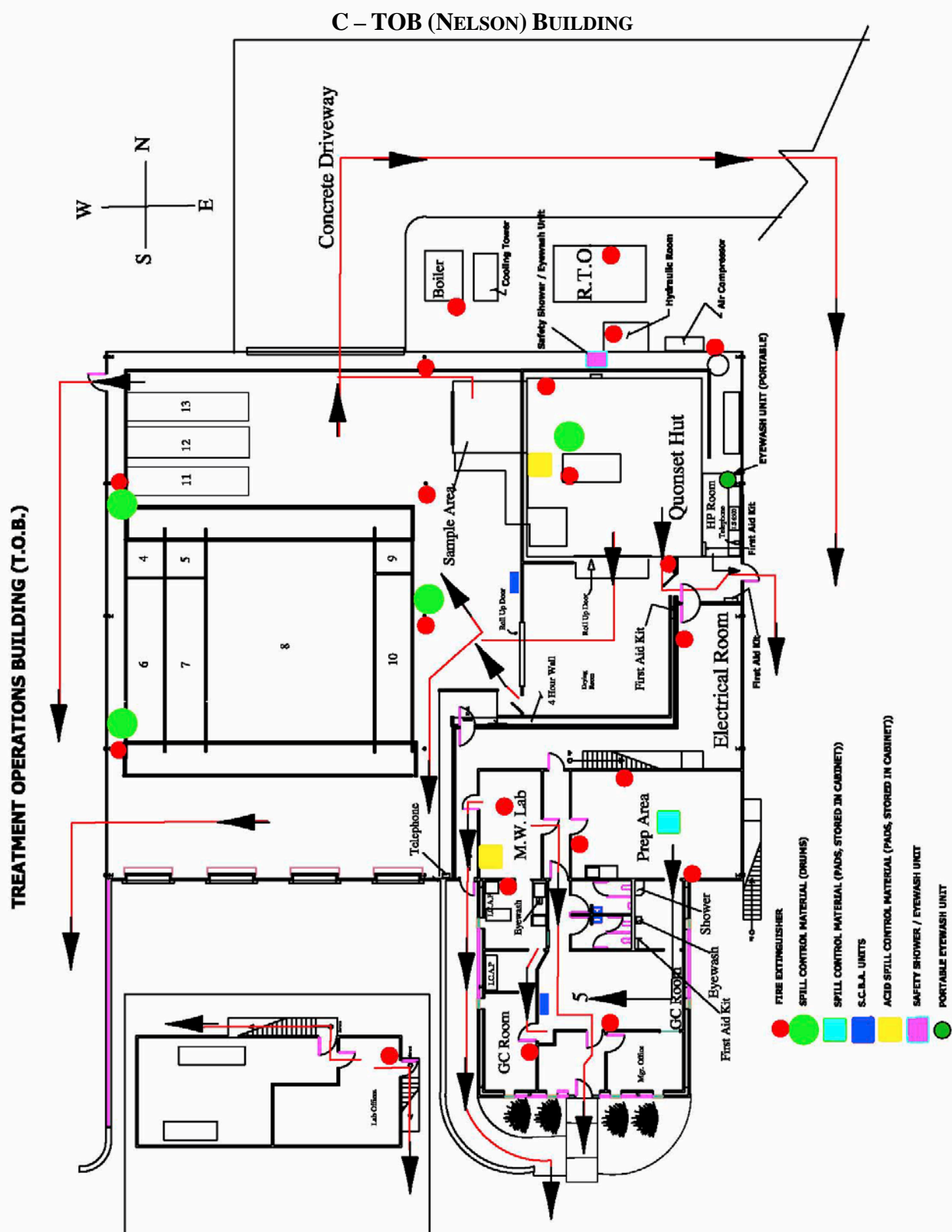
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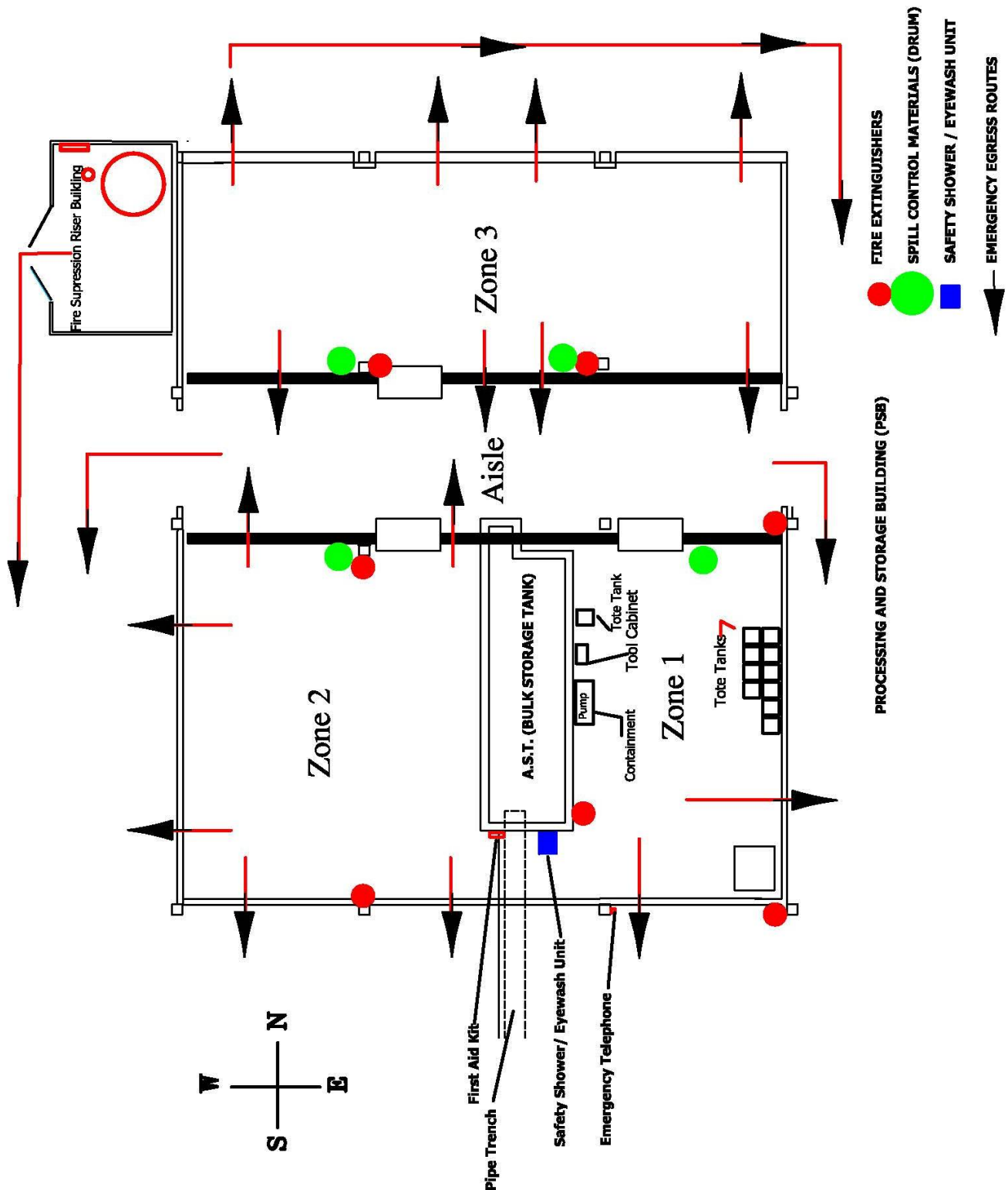
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ATTACHMENT CP-7

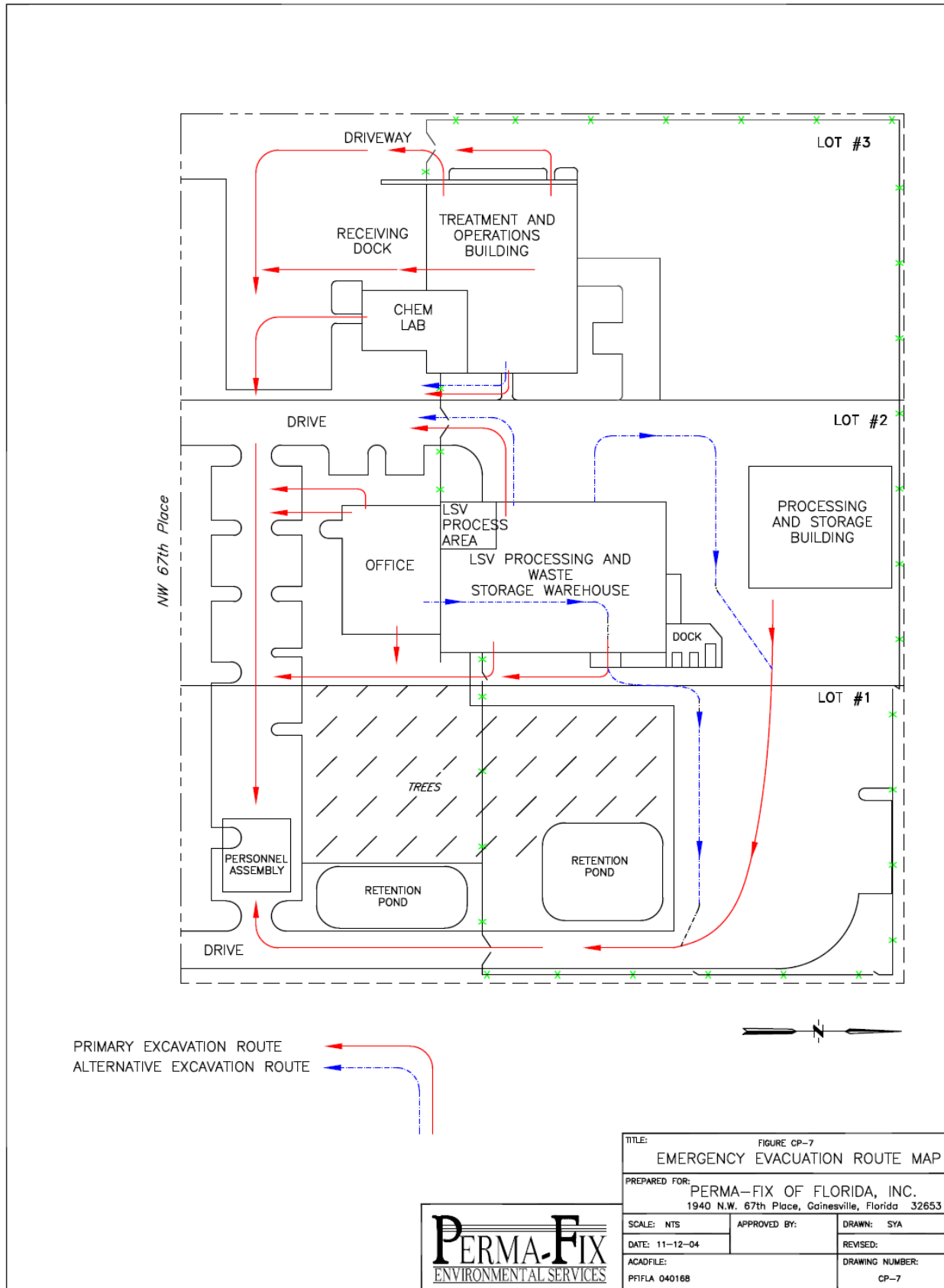
EMERGENCY EVACUATION ROUTE MAP

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EMERGENCY EVACUATION ROUTE MAP



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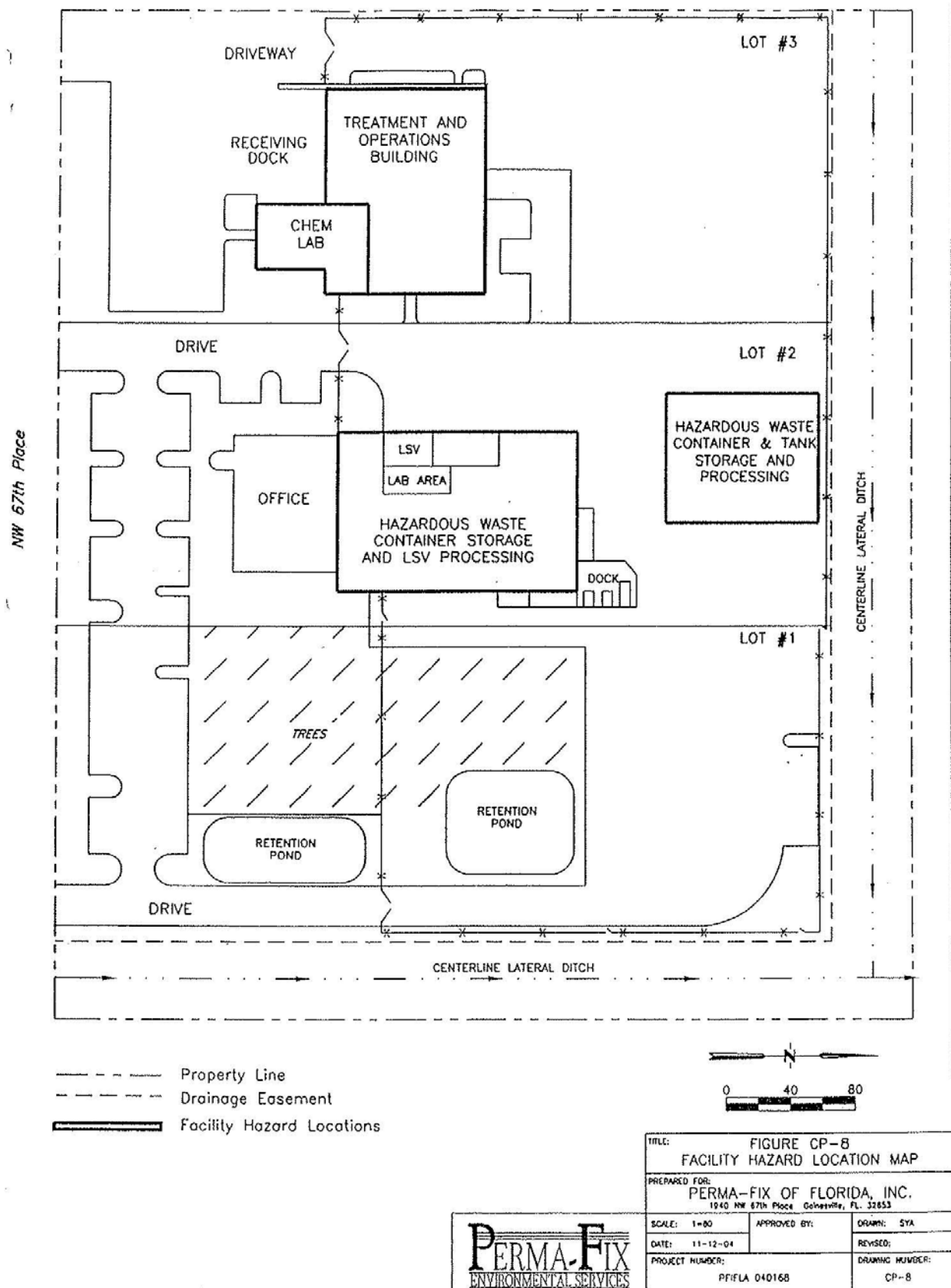
ATTACHMENT CP-8
FACILITY HAZARD LOCATION MAP

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FACILITY HAZARD LOCATION MAP



DO NOT DUPLICATE

ATTACHMENT CP-9

COORDINATION AGREEMENTS/RECEIPT DOCUMENTATION

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**ATTACHMENT CP-9
COORDINATION AGREEMENTS/RECEIPT DOCUMENTATION****EXAMPLE**Certified Mail

Return Receipt Request**ACCEPTANCE**

I certify that on this _____ day of _____, I received a copy of the Contingency Plan for Perma-Fix of Florida located at 1940 NW 67th Place in Gainesville, Florida 32653. Further, this organization agrees to respond to, or assist in, emergency situations which may arise at the subject facility should the need arise.

REFUSAL

By checking this box, the undersigned organization refuses to enter into an agreement to provide emergency response services to the subject facility. However, we do acknowledge receipt of the Contingency Plan being offered by Perma-Fix of Florida, Inc.

Signature:	
Printed Name:	
Title:	
Organization:	

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ATTACHMENT CP-10

CONTINGENCY PLAN REVISIONS - TRANSMITTAL LETTER

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**ATTACHMENT CP-10
CONTINGENCY PLAN REVISIONS - TRANSMITTAL LETTER**

EXAMPLE

Certified Mail

Return Receipt Request

DATE: _____

TO: _____

RE: Contingency Plan Revisions - Perma-Fix of Florida, Inc.

Dear _____:

Perma-Fix of Florida, Inc. has revised the facility's Contingency Plan document. Our facility is required to supply your organization with a complete copy of the Contingency Plan document, and all subsequent revisions in accordance with federal EPA regulations listed at 40 CFR 264.53/264.54.

Copies of the revised pages are enclosed for insertion within your organization's copy of the Perma-Fix Contingency Plan document. Please make the necessary updates to your copy of the plan and discard all outdated pages.

The regulation also requires Perma-Fix to document a coordination agreement with your department to respond to, or assist in, emergency services in the event of an emergency situation which may arise at our facility. A separate form and envelope is enclosed for you to complete and return to the facility in order to assure Perma-Fix is in compliance with these regulations.

If you have any questions regarding the information received or your organization's role in contingency planning for the Perma-Fix of Florida facility, please contact me at (352) 395-1356.

Sincerely,

Perma-Fix of Florida, Inc.

Kurt Fogleman
Environmental Health and Safety Manager

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Table 1 - CHAIN OF REVIEW

Please review, provide comments, sign, date, and return to AMSS. Do not forward to next level of review.					
	Procedure Writer ⁽¹⁾	Reviewer	Approver	Signature	Date
Environmental Health & Safety Manager ⁽¹⁾	X	X	X		
Quality Assurance Manager		X			
Radiation Safety Officer		X			
Final Review / Approval:					
Environmental Health & Safety Manager	X	X	X		
Vice President / General Manager		X	X		

Table 2 - Record of Revision

REV. NO.	PURPOSE OF REVISION	EFFECTIVE DATE
15	ANNUAL REVIEW	09/07/2010
	ANNUAL REVIEW – NO CHANGES NECESSARY	11/15/2011
	ANNUAL REVIEW – NO CHANGES NECESSARY	03/07/2012
16	ANNUAL REVIEW, UPDATE OF E.C. INFORMATION AND EM. EQUIPMENT LOCATIONS	12/20/2013

¹ **Notice to Document Writer:** Documents developed which have not had training performed are not considered fully implemented. Once the AMSS notifies the Document Writer of the completion of all approvals, please notify the QA Manager so that training can be scheduled.

SINGLE USE ONLY**January 7, 2014 (3:58PM)****PERMA-FIX OF FLORIDA, INC. - STANDARD OPERATING PROCEDURE (CC)**

F:\SOP\ACTIVE\EHS\H&S COMPLIANCE SOPS\019C - CONTINGENCY PLAN - (CC)\019C – R16 CP (CC).DOCX

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