

Part II.A.4.b Contingency Plan

Triumvirate Environmental Services, Inc.

**Contingency Plan
For
Solid & Hazardous
Waste Operations**

Facility Location:

10100 Rocket Blvd, Orlando FL 32824

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TABLE II.A.4.B.-1: EMERGENCY SERVICE ORGANIZATIONS PHONE NUMBERS

Emergency Contact List		
Facility Information: Triumvirate Environmental Services, Inc. 10100 Rocket Boulevard, Orlando, Florida 32824 407-859-4441		
Emergency Coordinators:		
Primary	Frank Colosi (Primary) 9650 Universal Boulevard Apt 457 Orlando, FL 32819	Cell: (813) 629-1104 Alt# (407) 859-4441
Secondary	Tyler Klawinski 7716 Crosswater Trail Apt 7106 Windermere, FL 34786	Cell: (352) 217-5431 Alt# (407) 859-4441
Alternate	Ross Taylor 545 South Keller Road Unit 1106 Orlando, FL	Cell: (407) 913-1882 Alt: (407) 859-4441
The National Incident Management System (NIMS) will be followed. Additional information can be found: http://www.fema.gov/national-incident-management-system		
Designated Person Accountable for Discharge Prevention:		
Facility Manger – Frank Colosi		Cell: (813) 629-1104
National Response Center (NRC):		1-800-424-8802
Cleanup Contractor(s):		
Eagle SWS Emergency Response		1-800-852-8878
Clean Harbors of Florida, LLC		1-800-645-8265
State Oil Pollution Control Agency – FDEP 24-Hour State Warning Point (Depart. of Community Affairs' Division of Emergency Management)		1-800-320-0519
Local Emergency Response Planning Committee:		
East Central Florida Regional Planning Council 309 Cranes Roost Boulevard, Suite 2000 Altamonte Springs 32701		407-262-7772 ext. 335
Other Federal/State/Local Agencies:		
EPA – Regional IV – 24-Hour Spill Reporting		1-800-424-8802
FDEP – Central District		407-897-4100
Orange County Emergency Management		911* or 407-836-9140 (local)
Local Fire Department – Orange County Fire Department		911* or 407-836-9000 (local)
Local Police Department – Orange County Police Department		911* or 407-836-6500 (local)
Hospital – Orange County Regional Medical Center		911* or 407-841-5111 (local)
Other Contact References:		
Boggy Creek (east-northeast) – South Florida WMD		800-432-2045
Neighboring Facility (west) – Cook Composites & Polymers		407-859-3030
Neighboring Facility (north) – Oldcastle Precast, Inc.		407-855-7580
Neighboring Facility (south) – L&S Logistics Services Orlando		407-582-0900

***Note: In the event of emergency, dial 911.**

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CONTINGENCY PLAN

1.0 INTRODUCTION

This document is prepared for Triumvirate Environmental Services, Inc. (to comply with state regulations for facilities permitted to manage hazardous wastes. The regulations require such facilities to insert into the permit application a copy of the contingency plan to be reviewed by the Florida Department of Environmental Protection (DEP) and approved with the issuance of the corresponding permit. A prior version of this plan, prepared for Perma-Fix of Orlando, Inc. was submitted and approved with the previous permit application. Triumvirate Environmental Services, Inc. updated the Contingency Plan with a name change upon purchase of the facility in October 2011 and maintains an updated version at the facility. Permitted facilities are required to provide a copy of the contingency plan to emergency response organizations likely to respond to incidents at the facility. This document is designed to provide helpful information about installations and potential hazards to emergency personnel responding to incidents at the facility, as well as to instruct facility personnel on what steps to take in case of emergency incidents.

The facility is designed, constructed, maintained and operated to minimize fire, explosion or unplanned release to media that could threaten human health and the environment (40 CFR Part 264.51(a)). This document contains plans and procedures established at Triumvirate Environmental Services, Inc. to minimize hazards to human health, property, and the environment in case of spills, fires, explosions, or other incidents that may release hazardous waste from storage and treatment units at the facility.

Plans and procedures in this document include information on emergency service organizations, assessment of potential dangers, decision criteria and implementation methods for the contingency plan, emergency procedures, an evacuation plan, and a list and location of emergency equipment. This document also contains the names of persons responsible for coordinating emergency activities and the names of local government, regulatory agencies, institutions, and contractors that will provide support, mitigation, and relief in case of emergencies. A copy of the contingency plan will be maintained at the facility and will be located in the drop-box, outside of the facility gate, that is maintained by the local fire department along with updates being provided to local emergency service organizations as needed.

2.0 GENERAL INFORMATION

This contingency plan and emergency procedures are prepared for Triumvirate Environmental Services, Inc. with a mailing and site address at 10100 Rocket Boulevard, Orlando, Florida 32824. The facility telephone number is (407) 859-4441. The facility site is located in the southwest part of Orlando in the Regency Industrial Park, located approximately 3.5 miles west of the Orlando International Airport and about 1.5 miles to the southeast from the intersection of State Road 528 and the Florida Turnpike. The Triumvirate Environmental Services, Inc. site may be accessed from north and south Orange Blossom Trail (OBT) through Taft-Vineland

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Road and the Central Florida Parkway, respectively, and through Taft-Vineland Road from Orange Avenue. The closest road intersection on Rocket Boulevard from the facility is General Drive, which is located half a block away to the west. The facility stores hazardous and non-hazardous wastes in containers. Hazardous wastes received at Triumvirate Environmental Services, Inc. are generated by manufacturing and service industries. The hazardous wastes are transported to the facility in DOT-approved containers. The wastes received at Triumvirate Environmental Services, Inc. are consolidated in larger containers or shipped out in the same container in which they were received by the facility.

3.0 EMERGENCY SERVICE ORGANIZATIONS

Table II.A.4.b.-1 lists the service type, name of the service organization, and telephone number for each organization that has been identified as a potential emergency service organization. This list will be posted near telephones located in areas from which emergency calls are most likely to be made to provide callers with the information necessary to summon help in case of an incident.

The type of organizations that are most needed in case of an emergency are: Emergency Response (Hazardous Materials) Team, Fire Department, Hospital, and Sheriff's Department. Figure IIA-7 shows the locations of the organizations mentioned in the previous sentence that are closest to the Triumvirate Environmental (Florida) Inc. site. These organizations will be provided with a copy of the contingency plan upon its approval by the Florida DEP. These organizations will also be notified every time there is a change in –

1. emergency coordinators.
2. waste type or location of waste types that pose an additional or different safety concern to the ones described in this plan.
3. structures, equipment, or operations that affect the way this plan is to be implemented.
4. structures, equipment, or operations that alter the level of hazard at the facility
5. emergency procedures contained in this plan that may affect the level of service to be rendered by these organizations.

This document will be amended to reflect any of the changes described above, and a copy of the amended document will be provided to those organizations. This plan will also be amended when changes are necessary to improve response to emergencies. Finally, this plan will be amended if the plan fails in an emergency (40 CFR Part 264.54(b)).

Emergency organizations are expected to provide the following support during emergencies:

Hazardous Materials Emergency Response Team

The emergency coordinators and cleanup contractor(s) will help mitigate hazards posed by hazardous materials that are out of control and help retrieve injured personnel from hazardous environments. The local emergency response team, from the local fire department, that renders this type of service is the Hazardous Materials Response Team #54, which is located at the intersection of Central Florida Parkway and Sea Harbor Drive about 6.5 miles southwest of our

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site at 6500 Central Florida Parkway in Orlando, about 16 minutes from our location. This FD Unit is know as Squad 1. This organization will be provided a copy of the contingency plan.

Fire Department

The Orange County Fire Department has visited the facility to familiarize themselves with the operations and in addition to conducting yearly inspections. The Orange County Fire Department will respond to fires and other emergency incidents providing fire protection and rescue services. The department operates units located in several stations near the Triumvirate Environmental Services, Inc. site. These stations and their response capability are listed below.

Station #73: This unit is located in the town of Taft less than 2 miles northeast from the site at the intersection of Orange Avenue (State Road 527) and 1st Street, at 811 E. 1st Street, Orlando. The response time for this unit is about 4 minutes. This unit will be the first responder in the event of a fire.

Station #53: This unit is located just east of OBT about 2 miles northeast from the site, at 1270 La Quinta Drive, Orlando. The response time is approximately 6 minutes. The unit can provide medical support.

Station #51: This unit is located just west of OBT about 4.5 miles north from the site, at 1700 W. Oakridge, Orlando. The unit's response time is approximately 10 minutes. The unit can provide a ladder truck in case of a fire.

A copy of the contingency plan for the Orange County Fire Department will be provided to the Deputy Chief, Operations at the Orange County Fire Rescue Division, 6590 Amory Court, Winter Park, Florida 32792 upon approval of the plan by the Florida DEP.

Hospital

Orlando Regional Healthcare (ORH) can provide almost all emergency medical services that may be needed by injured personnel. ORH offers minor trauma services at the Dr. P. Phillips Hospital located just west of I-4 and about 6 miles east of the site, at 9400 S. Turkey Lake Road, Orlando. The time of travel is about 10 minutes from the facility. ORH offers major trauma services at the Orlando Regional Medical Center (ORMC) located about 8 miles north of the site at 1414 Kuhl Avenue, Orlando, Florida 32806. The time of travel to this unit is about 14 minutes from the facility. A copy of the contingency plan will be mailed to the ORMC upon approval of this plan by the Florida DEP.

Sheriff's Department

The Orange County Sheriff's Office is available to direct traffic, handle crowds, and provide security during emergency situations. The Sheriff will be provided a copy of this document at the Orange County Sheriff Office, 2500 W. Colonial Drive, Orlando, Florida 32802, upon its approval by the Florida DEP.

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Copies of the contingency plan, in accordance with statements shown above, will be provided to the emergency service organizations within 30 days after the application is deemed complete. Certified return receipt slips providing proof of mail and delivery of the documents will be kept with pertinent records at the facility.

Incidents of large magnitude may require the use of heavy equipment for containment, removal, and transportation of contaminated materials. If the heavy equipment is not available, Triumvirate Environmental Services, Inc. will seek the help of outside emergency response contractors to assist the facility during special emergency circumstances. Triumvirate Environmental Services, Inc. has contacts with Eagle SWS Emergency Response and with Clean Harbors of Florida, LLC.

4.0 EMERGENCY COORDINATORS

In case of emergency, the following people would be in charge of emergency coordination and remedial action. Each coordinator will be available 24/7:

<u>NAME</u>	<u>HOME ADDRESS</u>	<u>PHONE</u>
Frank Colosi (Primary)	9650 Universal Blvd Apt 424 Orlando, FL 32819	Cell: 813-629-1104 Alt#: 407-859-4441
Tyler Klawinski (Secondary)	7716 Crosswater Trail Apt 7106 Windermere FL 34786	Cell: 352-217-5431 Alt#: 407-859-4441
Ross Taylor (Alternate)	545 S Keller Road Unit 1106 Orlando, FL	Cell: 407-913-1882 Alt# 407-859-4441

If an emergency situation develops at the facility, the discoverer should contact an emergency coordinator listed above. The primary emergency coordinator should be contacted first. If they are not available, the secondary emergency coordinator should be called.

The primary emergency coordinator and his alternate have the authority to commit all resources of the company in the event of an emergency.

5.0 AREAS AND MATERIALS PRESENTING POTENTIAL HAZARDS

The facility has certain areas that present a potential hazard because of the materials that are stored or processed at those locations. The degree of hazard present in these areas is based on the material types, the quantities managed, and the level of handling such materials. These areas are the Container Storage Unit and the loading dock, and the Waste Consolidation and Stabilization Area. Figure IIA5 contains a layout of the Triumvirate Environmental Services, Inc. facility showing the areas listed above. The portion of the facility that includes the areas

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mentioned above is considered the "active portion of the facility". This section of the plan describes each area in detail, the operations conducted in each area, the materials handled, and where each type of material is stored or processed.

5.1 Container Storage Unit

This area receives hazardous and non-hazardous waste in drums that are stored on pallets. The pallets are, at the most, double-stacked, with each pallet holding up to four 55-gallon drums. The pallets are placed in rows, as depicted in Figure I D 1. Every storage cell is identified with a sign showing the DOT hazard class(es) of compatible wastes stored in the cell. The compatibility of different wastes within a cell is determined by a compatibility system established by the Department of Transportation (DOT).

The reason for using the DOT compatibility system is to prevent two incompatible materials from coming in contact with each other and generating a reaction, which could result in fire, explosion, or generation of toxic gases. EPA hazardous waste codes are assigned based on chemical lists and on the hazardous characteristics exhibited by the material. These characteristics may be ignitability, corrosivity, reactivity, or toxicity. A DOT hazard class is a number that indicates the category that has been assigned to a material based on the type of hazard it presents. Table II.A.4.b.-2 contains the Segregation Table obtained from DOT. It has been modified to delete hazard classes that Triumvirate Environmental Services, Inc. is not permitted to manage at the facility (1.1 through 1.6 - explosives, and 7 - radioactives).

Table II.A.4.b.-3, lists the hazardous wastes stored in the container unit. DOT hazard classes shown on containers that are stored in this unit are based on the actual properties and characteristics exhibited by the waste materials in the containers, in accordance with an evaluation of the waste completed before the waste was received by the facility. The containers in this unit are placed in cells with the hazard classes displayed on the container and each cell. The purpose of the segregation system instituted by Triumvirate Environmental Services, Inc. is to indicate to operators where to place specific waste containers within the unit and to provide emergency responders with an easy and quick way to identify hazards present within the unit.

There is a dedicated storage cabinet for Division 4.3 Dangerous When Wet (water-reactive) wastes. It will protect up to four 55-gallon drums from water in case the sprinklers inside the container storage unit are activated. It is typically kept in the northeast corner of the container storage area. A sketch of the cabinet is provided as Exhibit II.B.1.-2. The cabinet is equipped with a dry chemical fire suppression system. Lock out/tag out procedures will be used to prevent personnel from placing waste in the cabinet for periods of time that the cabinet has not been maintained/inspected.

Figure I D 1 shows the container storage unit, with locations of each row of pallets. This figure is for informational purposes. Signs showing the corresponding hazard classes for wastes currently stored in every cell will be posted on cell walls at locations clearly visible for first responders. There is a concrete block wall (minimally rated as a two-hour fire wall) along the west half section of the north wall which was built 3 feet inside the unit and isolates the north building from the container storage unit.

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5.2 Consolidation and Stabilization Area

Triumvirate Environmental Services, Inc. is authorized to consolidate compatible hazardous wastes stored in containers into larger containers. Hazardous waste which can be disposed of together at an approved hazardous waste facility will only be consolidated. Only hazardous waste that has passed the acceptance procedures described in the Waste Compatibility Test Manual will be consolidated. Triumvirate Environmental Services, Inc. will not consolidate acids, inhalation hazards, reactives (D003), or oxidizers. Flammable material which is intended for fuel blending or incineration may be consolidated contingent upon NFPA upgrades. The Waste Compatibility Test Manual will determine compatibility in determining which waste streams will be intended for consolidation. Consolidations will take place in the Waste Consolidation and Stabilization Area identified in Figure II.A.5.

5.3 Loading Dock

Hazardous and non-hazardous wastes and material are loaded, unloaded, and stored for up to 10 days on the loading the dock. The DOT segregation is followed and containers are managed per the Waste Analysis Plan. The fire suppression system has been upgraded in the Loading Dock for transfer, sampling and 10-day storage of flammable material. Sampling of permitted wastes may occur in accordance with the Waste Analysis Plan.

6.0 IMPLEMENTATION OF CONTINGENCY PLAN

The person discovering any fire, regardless of size/magnitude, shall immediately notify the fire department (NFPA 1-10.7.1.1). Persons shall not make, issue, post or maintain any regulation or order, written or verbal, that would require any person to take any unnecessary delaying action prior to reporting a fire to the fire department (NFPA 1-10.7.1.4).

The decision to implement the contingency plan depends upon if an imminent or actual incident could potentially threaten human health and safety or the environment. This plan provides specific guidelines for activating the emergency procedures in the contingency plan. Three factors will be evaluated: potential hazards of confined spills, spills affecting incompatible wastes, and uncontrolled spills. If a spill inside a secondary containment poses a threat in the form of fire or explosion or creates a health problem, the contingency plan will be activated.

Emergency procedures in the contingency plan will be implemented when spilled material comes in contact with incompatible wastes and there is a potential of a reaction that may result in fire, an explosion, or generation of poisonous or flammable gases. Uncontrolled spills that have the potential or have resulted in releases to the environment in magnitudes that equal or exceed reportable quantities in the 40 CFR 302.4 will also require the implementation of the contingency plan. Releases are defined in the 40 CFR 302.3. The Florida DEP will be notified of incidents at the facility requiring the implementation of the contingency plan or when the size of the release into the environment equals or exceeds the reportable quantities or when a material exceeds the volume on chapter 62-150 hazardous substance release notification. Spills will be documented in inspection records. The next sections will provide guidance to the

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emergency coordinators in making decisions by providing explicit instructions to be carried out in the event of an emergency.

7.0 EMERGENCY PROCEDURES

Emergency Plans shall include the procedures for reporting emergencies to building occupants and staff and any other requirements of the AHJ (NFPA 1-10.9.2.1). Upon being notified by facility personnel or government officials of a hazardous waste release that could threaten human health or the environment, as determined by the Emergency Coordinator, he/she will -

1. immediately identify the character, exact source, amount, and real extent of any released materials via observation, review of facility records, or chemical analysis, if necessary.
2. call in any extra personnel needed to complete the initial evaluation of the situation.
3. concurrently assess possible hazards to human health or the environment via the above determinations.
4. notify key support and key management personnel.
5. activate alarm systems and conduct an evacuation, as necessary.
6. seek assistance from the Orange County Sheriff's Department, Fire Department and the Florida DEP Central District, as needed.
7. notify either the government official designated as the on-scene coordinator for that geographical area or the National Response Center (using their 24-hour toll free number 800/424-8802). The report must include:
 - (i) Name and telephone number of reporter
 - (ii) Name and address of facility
 - (iii) Time and type of incident (e.g., release, fire)
 - (iv) Name and quantity of material(s) involved, to the extent known
 - (v) The extent of injuries, if any, and
 - (vi) The possible hazards to human health, or the environment, outside the facility

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8. notify the Florida DEP's 24-hour warning point at 1-800-320-0519 if human health or the environment may be threatened outside the facility. The determination for the need of notification shall be made with the knowledge of the above assessment of actual conditions.
9. take all reasonable measures necessary during an emergency to ensure that fires, explosions, and releases do not occur, recur, or spread to the other hazardous waste at the facility. All operations shall stop, containers shall be removed and isolated, containment systems shall be inspected, and emergency equipment shall be utilized.
10. provide for treating, storing, or disposing of recovered waste, contaminated soil, or any other material that results from a release, fire, or explosion at the facility. No waste that may be incompatible with the released material is treated, stored or disposed of until cleanup is completed-264.56(h)(1)
11. ensure that all emergency equipment is cleaned and fit for its intended use before operations are resumed. Used fire extinguishers shall be replaced, and other equipment shall be inspected as necessary.
12. notify the FDEP, and appropriate state and local authorities that the cleanup has been completed; the released material has been treated, stored, or disposed of; and emergency equipment has been cleaned and fit for use before operations are resumed in the facility.
13. submit a written report on the incident to the FDEP, within 15 days after the incident and identify such incidents in the facility operating record. The report will include:
 - (i) Name, address, and telephone number of the owner or operator
 - (ii) Name, address, and telephone number of the facility
 - (iii) Date, time, and type of incident (e.g., fire, explosion)
 - (iv) Name and quantity of material(s) involved
 - (v) The extent of injuries, if any
 - (vi) An assessment of actual or potential hazards to human health or the environment, where this is applicable, and
 - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.
14. Submit notices and information required by the hazardous waste permit (e.g., information may be required that identifies a new Solid Waste Management Unit as a result of a release).
15. If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation,

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or ruptures in valves, pipes, or other equipment, wherever this is appropriate.
264.56(f)

7.1 Responses to Fires, Explosion, and Releases

The previous section was designed to provide general guidance for making decisions and to be used as a check-list during the implementation of the contingency plan. This section deals with the effect that the type and amount of waste materials managed in the operation areas may have on the occurrence and development of emergency incidents at the facility. It also indicates features and equipment found or available in the area that may help mitigate such incidents. The two types of incidents discussed here are only fire and waste material release. Explosions will result either in a fire or a release, which are the incidents addressed in this plan.

7.1.1 Container Storage Unit

This area is considered the area within the active portion of the facility that presents the highest level of potential hazard because of the quantity and types of waste materials that may be present in the area. The largest potential danger in this unit is fire due to the possibility that ignitable material may be stored in it. Containers that arrive at this unit are opened only for sampling, after which they are placed in a storage cell in accordance with the DOT hazard class displayed on the container. As explained in section 5.1 above, the waste materials are segregated into cells having separate secondary containments. Cell segregation and careful management of container placement shall prevent commingling of incompatible wastes. Only small fires will be fought in this area by using any of the 5-pound, 20-pound, or 150-pound fire extinguishers located inside or outside near the entrances to the unit. Personnel will not attempt to extinguish fires where there is a threat that their escape path is threatened. If the fire is not put out within a short time of the fire's initial stage, the fire alarm will be activated as the first step in the implementation of the contingency plan. This storage unit is equipped with an automatic fire sprinkler system that covers the unit's entire area.

Every cell in this unit is provided with secondary containment capable of containing more than 10% of the maximum storage volume permitted for the cell. If the secondary containment capacity of a cell is exceeded, overflow will spill into another cell, from which, when exceeded, overflow will spill into another cell, and so on. The only way a spill may be released outside the unit is if the spill becomes of such magnitude that it exceeds all the internal cells' secondary containment volumes, and the capacity of the berm that surrounds the entire unit. The berms and walls that surround the entire unit are higher than the berms that provide containment for the internal cells. The minimum height of the roll-over berm and curbs are 3.5". Therefore, a release to areas outside the container storage unit is unlikely.

Spills confined to the cell where the spill occurs should not present a hazard to human health or the environment if the spill is cleaned up within a reasonable period of time in accordance with proper safety procedures. Such spills will not activate the implementation of the emergency procedures in this contingency plan.

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Spills that exceed the cells' secondary containment volume will not activate the implementation of the contingency plan if the spill only affects cells that store compatible waste materials. Spills will be confined to the smallest possible area using sorbent booms and oil dry. Standing liquid pools will be collected with air driven pumps and/or sorbent material. A spill from only one cell that affects another cell, which stores waste that is not compatible with the spilled material, will activate the implementation of the contingency plan, and the spill will be collected immediately if it can be determined that the clean-up can be done safely. Depending on the circumstances it might be better to allow first responders to assess. The spilled material will be transferred to containers and identified from information obtained in the waste characterization process. Spills where two or more waste streams become commingled may require testing of the release for characterization depending on whether spilled waste streams were identified and on whether the collected material may be substantially different from the spilled waste streams. Spills that result in releases outside the unit will require full implementation of the contingency plan. Waste spilled outside the unit may be contained by utilizing boom, stay-dry, or by creating earthen berms in the parking lot. If these berms are overrun, the waste will spill into the storm water pond. Releases into the soil will require removal of contaminated soil and verification of decontamination through sampling and testing of surrounding soils. All collected wastes from spills will be properly disposed of by permitted methods.

7.1.2 Waste Consolidation and Stabilization Area

Triumvirate Environmental Services, Inc. is authorized to consolidate compatible hazardous wastes stored in containers into larger containers. Hazardous waste which can be disposed of together at an approved hazardous waste facility will only be consolidated together. Only hazardous waste that has passed the acceptance procedures described in the Waste Compatibility Test Manual will be consolidated. Triumvirate Environmental Services, Inc. will not consolidate acids, inhalation hazards, reactives (D003), or oxidizers. Flammable material which is intended for fuel blending or incineration may be consolidated contingent upon NFPA upgrades. The Waste Compatibility Test Manual will determine compatibility in determining which waste streams will be intended for consolidation. Consolidations will take place in the Waste Consolidation and Stabilization Area identified in Figure II.A.5.

The consolidation area inside the building is equipped with an automatic fire sprinkler system and there are a number of 5-pound, 20-pound, and 150-pound fire extinguishers either in the area or nearby.

7.2 Procedures, Structures or Equipment used at the Facility to:

(a) Mitigate effects of equipment failure and power outages:

During a spill and or emergency the contingency plan will be activated and proper equipment will be used. All powered equipment that is owned by Triumvirate Environmental Services, Inc. undergoes routine preventative maintenance schedules and pre- and post-trip inspections. As preventative maintenance and routine inspections are being done the event of an equipment failure is remote and in that event new

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equipment will be ordered. In the event of a power failure Triumvirate Environmental Services, Inc. will not conduct contingency operations until a generator, or other source of power is brought to the facility and the activities can be safely resumed.

(b) Prevent hazards in unloading operations

In any operation at the facility, including unloading operations, only facility staffs that are trained in the unique hazards of the facility can conduct work. All personnel working in the facility an extensive two-part training that is outlined in the training program.

(c) Prevent exposure to hazardous waste

Facility personnel wear a level D uniform consisting of ANSI approved steel toe shoes, protective eyewear, and chemical resistant pants and long sleeve shirts. All drums and containers handled at the facility remained closed unless they are completing consolidation activities. Depending on the consolidation activities appropriate personnel protective equipment will be worn. In addition, all facility employees are part of the medical surveillance program.

(d) Prevent contamination of water and supplies:

The facility strictly follows a storm water prevention plan (SWPP) which prevents and mitigates water contamination. All supplies are kept separated from waste by either demarcation or by storing them in separate areas from waste materials.

(e) Prevent run-off from hazardous waste handling areas to other areas of the facility or environment, or to prevent flooding

Hazardous waste at the facility is stored in secondary containment in cells of like material. If the secondary containment cells over-fill the entire floor is also under secondary containment. The loading and unloading areas are equipped with emergency equipment as outlined in section 8.0 of the plan that will be used to prevent releases to the environment. In the unlikely event of hazardous waste making it to the parking lot all employees are trained to berm, dike and prevent a release from reaching the low point of the parking lot that discharges into the storm water retention pond.

(f) Prevent releases to atmosphere

The facility handles liquid waste and any exhaust systems are designed to prevent worker contamination. The facility does not conduct activities that would release air pollutants.

8.0 EMERGENCY EQUIPMENT

The facility is equipped with the adequate emergency equipment to respond to several types of emergency incidents. The emergency equipment is placed in strategic locations where it can be reached quickly and safely in the event of an emergency.

All emergency equipment is dedicated to emergency situations and is not used for normal operations. Use of the emergency equipment is not limited to events that require implementation of the Contingency Plan. However, all emergency equipment will be cleaned and fit for use immediately after it has been used and will be placed in the locations indicated in this section of the plan. To control access to the cabinet and assure immediate identification of status, the cabinet will be secured with a seal that is easy to break. Only one person will be designated the keeper and replacer of the seals. Periodic inspections will ensure that the emergency equipment is complete and ready to use.

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Alarm switches are located in the administration building. Since the property is small in area and all active areas and units are open to the outside, a spoken call for help can be heard in all the active areas of the facility where operators are working during working hours. An employee working alone will carry a walkie-talkie and/or a cell phone. The small area of the facility makes internal communication devices unnecessary for emergency situations.

A fire hydrant, located near the entrance to the facility, provides water in case of a fire. A fire sprinkler system services the container storage unit and the north building. A cellular phone will be available for the receptionist to use during power outages. Power outages will neither create an incident during normal operation processes nor affect response to emergency situations.

Figure II.A.5 shows the location of the emergency equipment. Table II.A.4.b.-4 lists the equipment stored in the cabinet and shown in the figure mentioned above.

The facility shown in Figure I D 1 is small in size, and personnel working at various locations of the facility in most cases could communicate by word of mouth during an emergency situation. Facility personnel also carry a mobile communication device, such as a cell phone or two-way radio. By using radios and cell phones personnel at the facility will can provide information to personnel at other locations and inside the facility and to summon help from outside the facility. In addition, a paging system may be used to transmit to facility personnel information or instructions inside and/or outside of the facility. Also, the fire alarm devices located at various parts of the facility will emit a loud sound when activated in case of a fire.

9.0 EVACUATION PLAN

All emergencies require prompt and deliberate action. In the event of any major emergency, it will be necessary to follow an established set of procedures. Such established procedures will be followed as closely as possible; however, in specific emergency situations, the Emergency Coordinator may deviate from the procedures to provide a more effective plan for bringing the situation under control. The Emergency Coordinator is responsible for determining which emergency situations require plant evacuation.

Total plant evacuation is initiated only by the Emergency Coordinator. A fire alarm system is installed with alarm boxes located at critical areas in the facility. The fire alarms can also be used to summon aid in other emergency situations. All employees are familiar with relevant alarm box locations.

In the event plant evacuation is called for by the Emergency Coordinator, the following actions will be taken:

- a. The instructions for plant evacuation will be communicated using the internal paging system.
- b. No further entry of visitors, contractors, or trucks will be permitted. All vehicle traffic within the plant will cease to allow safe exit of personnel and movement of emergency equipment.

Part II.A.4.b Contingency Plan

- c. ALL personnel, visitors, and contractors will immediately leave through the exit gate to gather at the designated rally points.
- d. No persons shall remain or reenter the location, unless specifically authorized by the person or persons calling for the evacuation. In allowing this, the person in charge assumes responsibility for those persons within the perimeter. Those within the fenced area will normally only include fire brigade personnel or emergency teams.
- e. ALL persons will be accounted for by their immediate supervisors.
- f. The appointed rally point is located at Rocket Boulevard by the east gate, Alternate rally point in any event the east gate is not accessible the rally point will be the west Gate. Immediately upon exit, the senior supervisor will compile a list of all personnel at the rally point.
- g. Upon completion of the employee list, the supervisor in charge will hand-carry the list to the Emergency Coordinator. All other personnel will remain at the gate area.
- h. The names of plant personnel and/or other emergency team members involved in emergency response will be reported, in writing, to the front gate by designated response team personnel.
- i. A final tally of personnel will be made by the Emergency Coordinator.
- j. An attempt to find persons not accounted for will be made only if it does not involve endangering lives of others by reentry into emergency areas.
- k. Reentry in the fenced area will be made only after clearance is given by the Emergency Coordinator. At his or her direction, a signal or other notification will be given for reentry into the plant.
- l. In all questions of accountability, immediate supervisors will be held responsible for those persons reporting to them. Visitors will be the responsibility of those employees being visited. Contractors are the responsibility of those persons administering the individual contracts. Truck drivers are the responsibility of the warehouse supervisor or the area supervisor where the truck is loading/unloading.
- m. Drills are held to practice these procedures and are treated with the same seriousness as an actual emergency.

Figure II A 9 shows routes employees and other persons at the facility at the time of an emergency will take when an evacuation is ordered.

Part II.A.4.b Contingency Plan

10.0 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 may be received from the National Weather Service or local media. Also, the EPA maintains a website containing information on how to prepare for a hurricane. The webpage is entitled: *As Hurricane Season Begins: A Reminder to Minimize Process Shutdown Related Releases and to Report Releases in a Timely Manner*, and it can be located at:

http://www.epa.gov/region4/r4_hurricanereleases.html

With tornadoes, there is usually little time to prepare. 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 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, personnel should attempt to track the path/progress of the storm. 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 Container Storage Unit will be placed on the floor if space is available.
- Any empty containers outside will be moved inside 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 or moved inside.
- 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.
- 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.

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. Depending on the severity of the storm and the safety on the individuals an emergency coordinator may stay onsite throughout the storm.

Sinkholes are naturally occurring in The State of Florida and they are unpredictable. In the event of a sinkhole work will cease, the emergency coordinators will be notified along with the local agencies. When outside responders arrive the National Incident Management System will be followed.

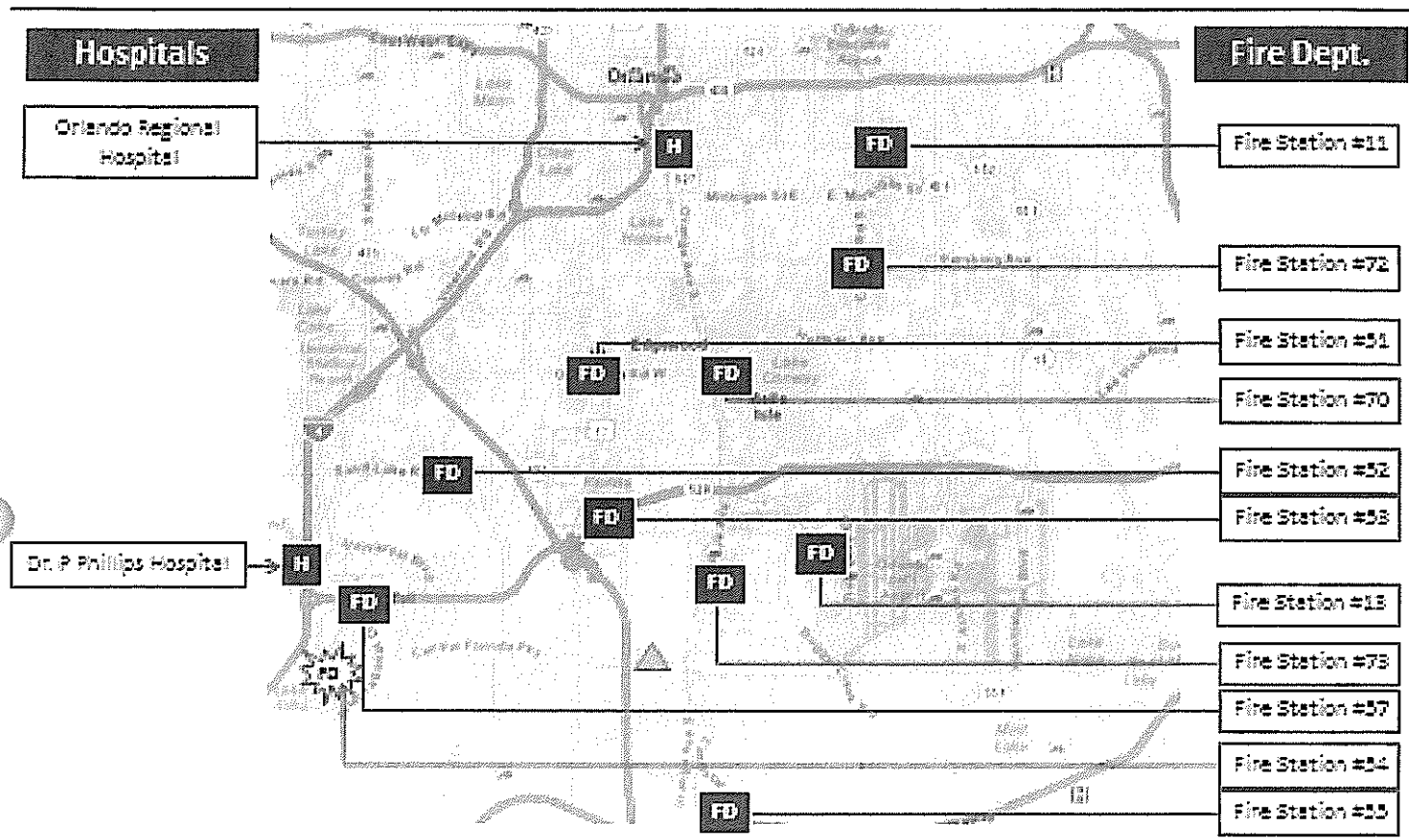
Part II.A.4.b Contingency Plan

FIGURE II A-7: EMERGENCY SERVICE ORGANIZATION

Emergency Service Organizations

Figure II A-7

Image Source: <http://map.floridadisaster.org/GATOR/map.html>



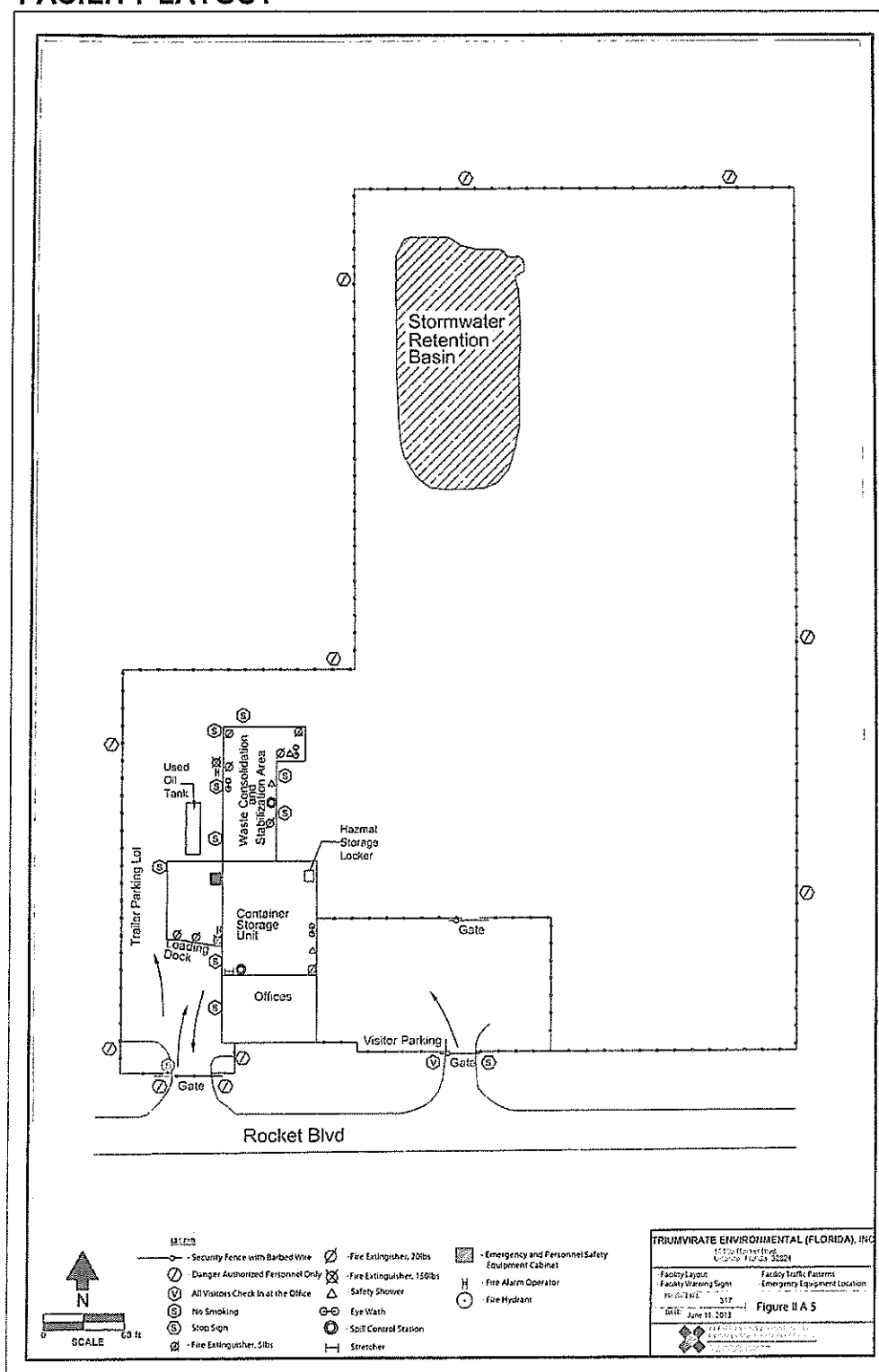
▲ Triumvirate Environmental - 10100 Rocket Blvd, Orlando, FL 32824

★ Closest HAZMAT Response Team - Station 54 - 6500 Central Florida Pkwy, Orlando 32824

Part II.A.4.b Contingency Plan

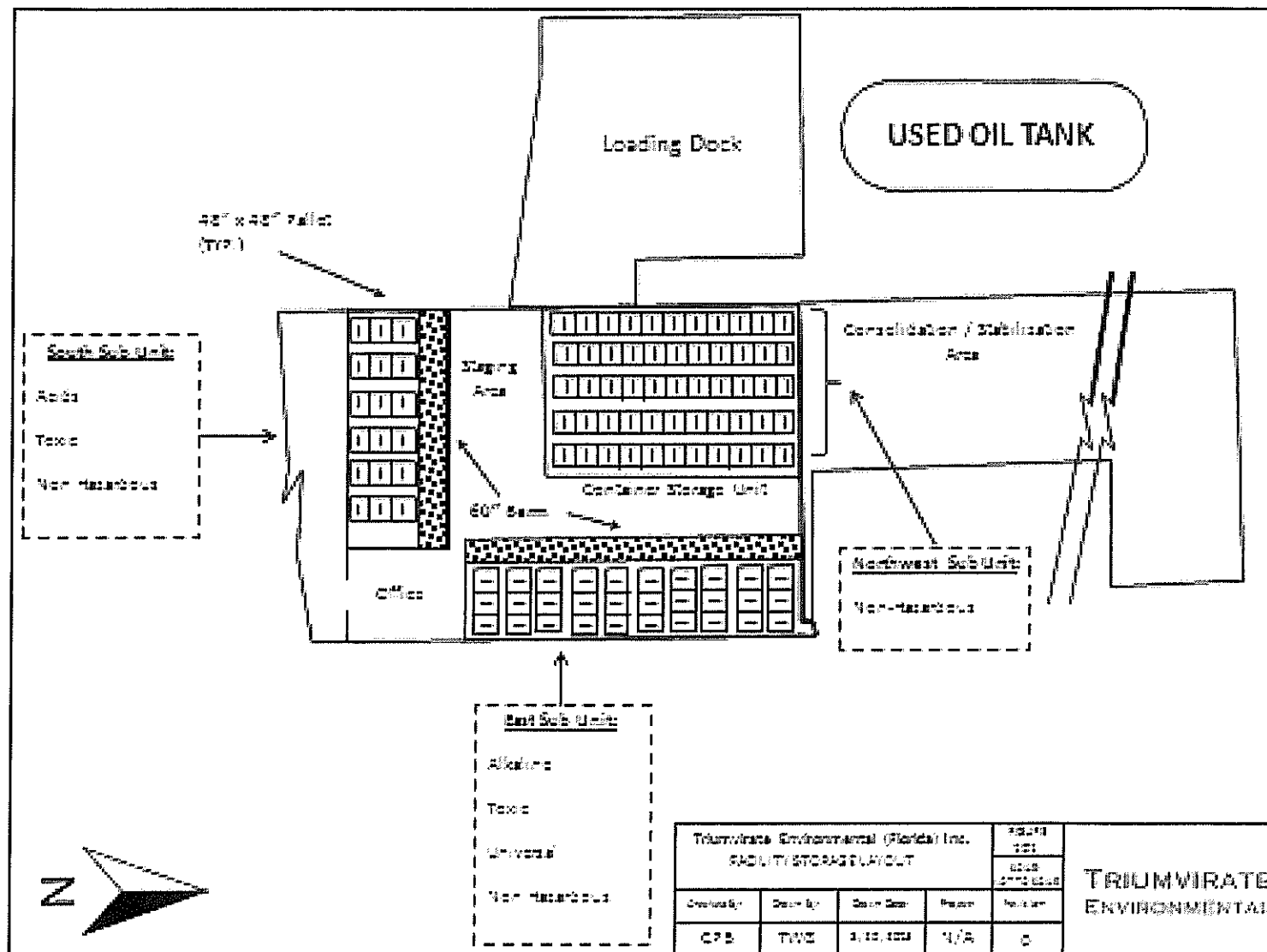
Part II.A.4.b Contingency Plan

FIGURE II.A.5: FACILITY LAYOUT



Part II.A.4.b Contingency Plan

FIGURE I D 1



Part II.A.4.b Contingency Plan

TABLE II.A.4.B.-2 SEGREGATION TABLE FOR HAZARDOUS MATERIALS

Class or Division	2.1	2.2	2.3 gas Zone A	2.3 gas Zone B	3	4.1	4.2	4.3	5.1	5.2	6.1 liquids PG I Zone A	8 liquids only	9 H.S.
Flammable gases 2.1			X	O							O	O	
Non-toxic, non-flammable gases 2.2													
Poisonous gas Zone A 2.3	X				X	X	X	X	X	X		X	
Poisonous gas Zone B 2.3	O				O	O	O	O	O	O		O	
Flammable liquids 3.			X	O					O		X		
Flammable solids 4.1			X	O							X	O	
Spontaneously combustible materials 4.2			X	O							X	X	
Dangerous when wet materials 4.3			X	O							X	O	
Oxidizers 5.1			X	O	O						X	O	
Organic peroxides 5.2			X	O							X	O	
Poisonous liquids PG I Zone A 6.1	O				X	X	X	X	X	X		X	
Corrosive liquids 8			X	O		O	X	O	O	O	X		
Hazardous substances 9													

Note: Codes X and O indicate prohibitions and restrictions as noted below.


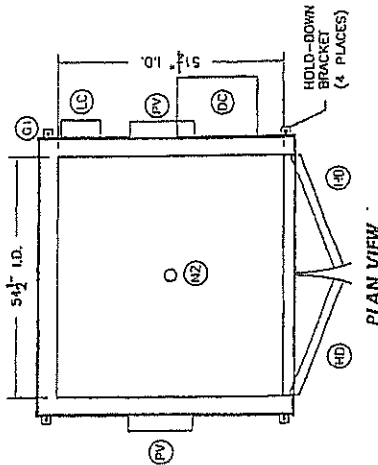
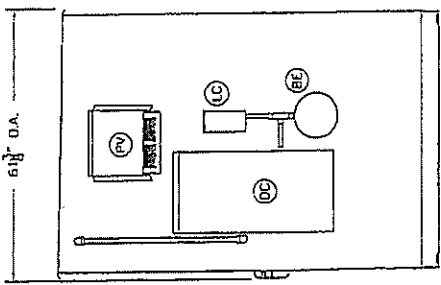
- An "X" in the table indicates that these materials may not be loaded, transported, or stored together.
- An "O" indicates that these materials may not be transported or stored together unless separated in such a way that, in the event of leakage from packages under normal transportation conditions, the hazardous materials could not commingle. Regardless of the methods of separation employed, Class 8 (corrosive) liquid materials may not be loaded above Class 4 (flammable solid) materials or Class 5 (oxidizing) materials.
- Cyanides or cyanide mixtures must not be loaded or stored with acids or acidic materials. The reaction of cyanides with acids releases deadly hydrogen cyanide gas.
- When the 172.101 Table or 49 CFR 172.402 requires a package to bear a subsidiary hazard label, segregation appropriate to the subsidiary hazard must be applied when that segregation is more restrictive than that required by the primary hazard. However, hazardous materials of the same class may be stored together without regard to segregation required for any secondary hazard if the materials are not capable of reacting dangerously with each other and causing combustion or dangerous evolution of heat; evolution of flammable, poisonous, or asphyxiate gases; or formation of corrosive or unstable materials.

TABLE II.A.4.B.-4 EMERGENCY EQUIPMENT AND PERSONNEL SAFETY EQUIPMENT CABINET

2	Empty 55-gallon, 17-H, lined drums – To store waste
2	Salvage drums (lined or poly) – To Store Waste
4	8-inch diameter, 10-foot long sorbent booms – To contain Spills
2	Spark-resistant safety shovels – To clean-up spills
2	Crowbars (nonsparking) – To remove and clean objects
2	18-inch pipe wrenches (nonsparking) – To open objects
2	Drum plug wrenches (nonsparking) – To plug drums
4	Explosion-proof flashlights – To provide lighting
1	Megaphone or Airhorn – For communication
2	Nylon ropes (each 50 feet long, ½ inch thick) – To complete confined space entries and/or tie off areas
1	Oxygen kit – For oxygen deficient atmospheres
5	Safety glasses – for eye protection
10	Safety goggles – for eye protection
5	Face shield/hard hat combination – head and eye protection
2	Emergency eye/face/body wash – for eye/face/body protection
20	Tyveks total body coverage - To keep personnel free of contaminants
4	Duct tape rolls – to hold things together
10	Rubber boots – to prevent footwear from contamination
10	Rubber gloves – to protect hands
5	Corrosive-resistant aprons – to protect the trunk
2	Corrosive-resistant suits – to prevent contamination of the body
5	Leather gloves – for hand protection
10	Half-mask respirators – for respiratory protection
5	Full-face respirators – for respiratory protection
1	Box of respirator cartridges (OV) – for respiratory protection
1	Hand-Held Explosion meter (contingent upon NFPA upgrades)
1	5-lb hand held fire extinguisher – located on figure II.A.5
1	10-lb hand held fire extinguisher – located on figure II.A.5
1	150-lb wheel-mounted fire extinguisher – located on figure II.A.5
*	Automatic sprinkler system – located in the warehouse
*	Spill Control Equipment located on figure II.A.5
*	Air-Driven pumps of various sizes
*	Alarms
*	Stretcher located in figure II.A.5
*	Cell Phones – for facility personnel

Part II.A.4.b Contingency Plan

EXHIBIT II.B.1.2: HAZMAT STORAGE LOCKER SKETCH

<p>CUSTOMER: TRIUMVIRATE ENV FL</p> <p>DRAWN BY: PVA</p> <p>DATE: 9-24-07</p> <p>ORDER NO.: 1002845</p> <p>SHEET: 1 OF 1</p>	<p>APPROVAL SIGNATURE _____</p> <p>DATE: _____</p>	<div style="text-align: center;">  <p>DENIOS Complete Storage Systems for Hazardous Materials</p> </div> <p>GENERAL SPECIFICATIONS:</p> <p>STORAGE CAPACITY: 4 EA. 55-GAL DRUMS</p> <p>UNIT EST. WEIGHT: 2,900 LBS.</p> <p>CONSTRUCTION: 2 HR FIRE RATED</p> <p>DOORS: HINGED DOORS</p> <p>SUMP VOLUME: 77 GAL.</p> <p>LEGEND</p> <p>G1-EXTERIOR GROUNDING LUG</p> <p>HD-HINGED DOOR</p> <p>PV-PASSIVE VENT</p> <p>LC-LOAD CENTER</p> <p>DC-DRY CHEM FIRE SUPPRESSION</p> <p>NZ-NOZZLE FOR DRY CHEM</p> <p>BE-BELL</p>
<p>PLAN VIEW</p> 		<p>RIGHT SIDE VIEW</p> 
<p>FRONT VIEW</p> 