VEOLIA
ENVIRONMENTAL SERVICES

TECHNICAL SOLUTIONS
NORTH AMERICA

February 13, 2020

Mr. Michael Fuller
Florida Department of Environmental Protection
470 Harrison Avenue
Panama City, FL 32401

RE: Veolia ES Technical Solutions, L.L.C.
342 Marpan Lane
Tallahassee, FL 32305
EPA ID Number FL0000207449
Permit Number 71455-HO-007

Emergency Contingency Plan Emergency Coordinator Information Change

Dear Mr. Fuller:

Enclosed please find a revised copy of the Veolia ES Technical Solutions, L.L.C. facility emergency contingency plan. The contingency plan (Section 6 of the Permit) has been updated to reflect recent personnel changes at the facility, in accordance with 40 CFR Part 264, Subpart D and Florida Administrative Code 62-730-180(1). Please discard the old plan and replace it with this revised plan.

The following changes have been made to the contingency plan:

- Section 6.6.1 Emergency Coordinator (EC) designation and Duties
  - Rafael Sarmiento been designated as an Alternate Emergency Coordinator.
  - Jarion Gavin been designated as an Alternate Emergency Coordinator.

If you have any questions regarding the Contingency Plan, please call me at (602) 233-6885 or Scott Fulton at (850) 877-8299.

Sincerely,

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

Wayne Bulsiewicz
Environmental Health and Safety Manager

Enclosure

Veolia ES Technical Solutions, L.L.C.
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6.0 Contingency Plan

6.1. Introduction

The purpose of this document is to describe the contingency plan and emergency procedures for Veolia ES Technical Solutions, L.L.C. (Veolia) operations pursuant to 40 CFR Part 264, Subpart D. and Florida Administrative Code 62-730-180 (1)

6.2 Identification

Veolia's mercury reclamation and recovery facility is located at 342 Marpan Lane in Tallahassee Florida. A site layout is presented in Figure 1 which identifies the location of the building. Figure 2 is a Site map of the facility. Appendix 6-1 contains Material Safety Data Sheets for each of the lamp types processed on-site and a Material Safety Data Sheet for elemental mercury.

6.3 System Overview

Mercury bearing lamps and mercury-containing devices are stored in the designated storage areas inside the building. Veolia has a mechanical processing system that is capable of processing fluorescent and high intensity discharge (HID) lamps that contain mercury. Mercury-containing devices such as thermometers, thermostats, blood pressure cuffs are processed by a combination of manual and mechanical processing. The entire process consists of receiving, staging, crushing, separating, and distillation to recover reusable mercury. The receiving process involves unloading, staging and inventorying product received. The staging process reflects setting up the lamps for crushing. The crushing process reduces the lamps into glass, aluminum end caps, and mercury bearing phosphor powder. The distillation process removes mercury from the phosphor powder. The recovered materials are stored on-site until sufficient quantities are collected and transported off site to an end user.

6.4 Documents Overview

This document describes emergency procedures and requirements for the Emergency Coordinator and Veolia employees. The personnel action requirements include emergency notification, emergency response, and evacuation procedures. This document includes a list of emergency equipment and proof of local authorities notification.

6.5 Purpose of Plan

6.5.1 Implementation of Plan

The provisions of this Contingency Plan will be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment (40 CFR 264.51(b)).

6.5.2 Amendment of Contingency Plan

The Contingency Plan will be reviewed and immediately amended, if necessary, whenever any of the following occur:

- The facility permit is revised.
- The plan fails in an emergency.
- The facility changes its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency.
- The list of Emergency Coordinators changes.
- The list of emergency equipment changes.

6.5.3 Reporting Procedures Emergency for Personnel

Aisle space is maintained at the facility in order to ensure the unobstructed movement of personnel, fire, and spill control equipment in an emergency. The provisions of this plan must be carried out immediately whenever there is a medical emergency, fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. The Operations Manager is the designated Emergency Coordinator (EC).

In the event of a medical emergency, Veolia personnel shall notify the Emergency Coordinator and then the local authorities by calling **911**.

The Emergency Coordinator shall call in the report and include the following information:

1. Veolia ES Technical Solutions, L.L.C. – telephone number 850-877-8299

2. Address: Veolia ES Technical Solutions, L.L.C.
   Mercury Reclamation/Recovery Facility
   342 Marpan Lane
   Tallahassee, FL 32305

3. Mercury Reclamation/Recovery & Storage Areas:
   Loading Dock
   Office
   Locker Room/Shower
   Break Room
   Distillation Room
   Processing Room
   Staging/Receiving Area
   Storage Area

4. Type of incident: (medical, fire, explosion)

5. Missing personnel and suspected location.

6. Extent of injuries, if any.

7. Name of material and quantity if known.

8. Possible hazards to human health outside facility.

In the event of fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment, the Emergency Coordinator or his designee shall immediately perform the following activities:

9. Notify all on-duty personnel to evacuate the facility.
10. Activate internal facility alarm/communication system.
11. Identify the character, exact source, amount, and extent of any released material(s) by observation or review of facility records and manifests.
12. Assess possible hazards to human heath or the environment that may result from the release, fire or explosion.
13. Notify appropriate State and Local agencies with designated response roles (if their help is needed) per section 6.10.

6.6 Emergency Procedures

6.6.1 Emergency Coordinator (EC) designation and Duties

Emergency Coordinator List

Primary EC	**Alternate EC**	**Alternate EC**
Scott Fulton	Rafael Sarmiento	Jarion Gavin
4169 Fred Hatfield Court	56 East Gate Way	27 Provo Place
Tallahassee, FL 32310	Crawfordville, FL 32317	Crawfordville, FL 32317
C (850) 688-8252	C (850) 779-7271	C (850) 322-0007
O (850) 877-8299	O (850) 877-8299	O (850) 877-8299
H (850) 210-2376	H (850) 779-7271	H (850) 322-0007

Veolia uses an on call system to notify the Emergency Coordinator. The primary Emergency Coordinator (listed first) is responsible for assigning a designee per 40 CFR Part 264.55. The EC shall have the authority to commit the necessary resources to contain and respond to the emergency. The EC shall be responsible for government notification and implementing the emergency response procedures. In the event the primary EC is not available you should contact the alternate EC's listed above.

6.6.2 Emergency Response Contractor

Veolia uses a network of emergency response contractors throughout the United States for the purpose of responding to emergencies at Veolia facilities or customer sites. For the Tallahassee facility, Veolia has established a contract with the below listed company for the provision of hazardous materials emergency response and remediation activities.

SWS Environmental Services
Panama City Beach
1617 Moylan Road
Panama City Beach, Florida 32407
Phone: (850) 563-0822
24-Hour Emergency Response: (877) 742-4215

6.7 Emergency Response Procedures

The EC shall take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, reoccur, or spread to other locations which contain hazardous materials. Veolia personnel shall be at a minimum in LEVEL C personal protective equipment pursuant to CFR 29 Part 1910.120 Appendix B. The following procedures will be carried out.

6.7.1 Containment Procedure

Isolate unprocessed powder canisters from fire hazards located in distiller area.

Closure of any open containers of mercury containing manufactured articles and lamps.

6.7.2 Equipment Shut Down Procedures

In the event of a fire or explosion, the following steps shall be taken.

1. Press one of the emergency off switches on the fluorescent lamp processing equipment. The emergency off switches are located adjacent to the in feed conveyors and on the main control panel.

2. Turn off HID capsule crusher system located in crusher-separator room.

3. Evacuate all personnel from the building and gather at rally point.

6.7.3 Personnel Injury

1. Quickly evaluate the extent of the injury.

2. Call 911 for all injuries other than those of a minor nature.

3. Administer emergency first aid on injured person.

4. Assign a person to the facility entrance to direct emergency services.

5. Move injured person to safety if it is safe and will not further harm the affected person.

6.7.4 Fire of Explosion

The EC shall take all reasonable measures necessary to contain the emergency. The following steps shall be taken if appropriate.

1. Call 911 emergency services and notify the operator that Veolia Electronics Recycling has a Contingency Plan.

2. Evacuate all personnel from the area.

3. Assign a person to the facility entrance to direct emergency services.

4. If appropriate, execute the Containment Procedure.

5. If appropriate, execute the Equipment Shut down Procedure.

6. Assign a person to monitor the facility for mercury vapor.

6.7.5 Spill

There are two types of spills (i.e. liquid mercury and solids contaminated with mercury) that could occur at Veolia. Each type of spill requires a different cleanup procedure. Personnel shall wear safety glasses, gloves, and shoes for all types of spills. Further protection may be required depending on the mercury vapor level and the size of the spill.

6.7.5.1 Liquid Mercury Spill Clean-Up Procedures: Routine Spills

A routine spill is defined as a small spill of <u>less than one pound</u> that occurs during normal work operations. A routine spill is further defined as one that is confined onsite and occurs near the distiller or liquid mercury storage containers and does not enter drains, storm water runoff outfalls, wells and/or soil.

1. Report spill to emergency coordinator.

2. Don personnel protective equipment gloves, protective clothing and respiratory protection.

3. Use Mercury Vapor Analyzer to monitor spill area to determine airborne mercury vapor levels. If the mercury vapor concentration exceeds 0.025 mg/m^3, a respirator is required.

4. Assemble spill cleanup equipment near the spill site, use mercury vacuum, mercury sponges and/or mercury spill powder to adsorb or chemically amalgamate mercury.

5. Clean spill area as many times as necessary to remove visible mercury.

6. Place collected mercury into a metal storage container.

7. Use Mercury Analyzer to carefully monitor airborne mercury vapor levels especially close to the surface of the spill. Refrain from drawing mercury droplets into the instrument. Levels above $0.025mg/m^3$ require additional cleaning.

8. Decontaminate as necessary if airborne mercury levels near the spill surface are above background.

9. Use as a final clearance step, use mercury indicating swabs or mercury indicator powder on the cleaned surfaces and/or equipment to determine residual amounts and repeat cleaning steps as necessary to achieve background.

10. Place spill materials and contaminated equipment in hazardous waste containers and label for recovery or disposal.

11 Make record of spill incident and resolution.

6.7.5.2 Liquid Mercury Spill Clean-Up Procedures: Non-Routine Spills

Non routine and large spills require a similar response to routine spills, but usually require more personnel. Large spills take more time to assess and complete associated tasks. Large spills can be a larger threat to the environment if not handled immediately by qualified personnel. A non-routine spill is defined as a spill involving greater than one pound of mercury and/or where personal injury or outside contamination (I.e. soil, water, drains) occur as a part of the spill or as a result of the spill.

1. Report spill to onsite supervisor and determine spill extent.

2. Notify applicable government agencies per Section 4.0.

3. Assemble spill response equipment. Call outside contractor for help as necessary.

4. Use Mercury Vapor Analyzer to check airborne levels. Use airborne mercury data to determine extent of personnel protective equipment required for the incident. If airborne concentrations are unknown Veolia requires the use of a SCBA and high level (A, B) protective clothing to protect the skin.

5. Set up a safe staging area based on air tests and surface contamination.

6. Begin clean up after donning personnel protective equipment and setting up decontamination area, assigning roles and carefully defining objective(s).

7. Accomplish cleanup as necessary by following steps outlined in routine Spills above.

8. Submit written reports to regulatory agencies per Section 6.10.

6.7.5.3 Solids Contaminated with Mercury Spill Clean-Up Procedures: Routine Spills

Routine spills of solids contaminated with mercury include spills of small amounts of broken lamps or debris contaminated with mercury is a concentration similar to that of broken lamps. Routine spills are further defined as ones that are confined onsite.

1. Report spill to emergency coordinator.

2. Don personnel protective equipment gloves, protective clothing and respiratory protection.

3. Assemble spill cleanup equipment near the spill site, use mercury vacuum, mercury sponges and/or mercury spill powder to adsorb or chemically amalgamate mercury.

4. Clean spill area to remove any visible signs of spilled material.

5. Place collected material into an appropriately marked and labeled storage container or place the material directly into the processing equipment.

6. Make record of spill incident and resolution.

6.7.5.4 Solids Contaminated with Mercury Spill Clean-Up Procedures: Non- Routine Spills

Non routine and large spills require a similar response as routine spills, but usually require more personnel. Large spills take more time to assess and complete associated tasks. Large spills can be a larger threat to the environment if not handled immediately by qualified personnel. A non-routine spill is defined as a spill involving greater than one pound of mercury and/or where personal injury or outside contamination occur as a part of the spill or as a result of the spill.

1. Report spill to onsite supervisor and determine spill extent.

2. Notify applicable government agencies per Section 4.0.

3. Assemble spill response equipment. Call outside contractor for help as necessary.

4. Use Mercury Vapor Analyzer to check airborne levels. Use airborne mercury data to determine extent of personnel protective equipment required for the incident. If airborne concentrations are unknown Veolia requires the use of a SCBA and Level B protective clothing to protect the skin.

5. Set up a safe staging area based on air tests and surface contamination.

6. Begin clean up after donning personnel protective equipment and setting up decontamination area, assigning roles and carefully defining objective(s).

7. Accomplish cleanup as necessary by following steps outlined in routine Spills above.

8. Verify clean-up through the use of direct reading instruments or sampling as appropriate for the media.

9. Submit written reports to regulatory agencies per Section 6.10.

6.7.5.5 Bomb Threat

1. The person receiving the bomb threat shall attempt to obtain as much information as possible from the caller.

2. The person receiving the bomb threat shall immediately notify the Emergency Coordinator.

3. Evacuate all personnel from the area (see evacuation procedures).

4. Lock exterior doors.

5. Call 911 from a separate location and follow their instructions.

6. Call building management company.

6.7.5.6 Civil Disturbance

1) Call 911 personnel and request appropriate assistance.

2) Notify the Emergency Coordinator.

3) Direct all personnel to a safe area.

4) Lock exterior doors if the disturbance is outside of the facility (see evacuation procedures).

5) Evacuate all personnel if the disturbance is inside the facility.

6) Lock as many doors as possible.

6.8 Emergency Equipment

Veolia shall have the following emergency equipment available and in working condition:

1) Fire – Portable fire extinguishers are located in the building (complying with local building codes). See Figures 2 and 3. They would be used to extinguish a fire if one should occur. An employee inspects each one monthly to determine that it is fully charged. An outside firm conducts annual inspections for each unit; each one is weighed and the hoses checked for wear.

2) Mercury Vacuum- Mercury vacuums are designed for the cleanup of mercury spills and have a air collection system that collects mercury vapor in a HEPA filter. Mercury vacuums are the only type of vacuum that should be used to clean up spills.

3) Mercury Spill Kit
There are two commercial kits located at the site is in a white box located in the distiller room. The other is in the Operations Managers office See Figure 2. The box is marked "Mercury Spill Control Station". The spill kit contains

absorbent powder, absorbent sponges, and a pump. Directions on how to use the equipment are located in the cover of the box. The spill kit is used to collect liquid mercury in the event of a spill. The Operations Manager ensures that it is complete.

4) Respirators
There are four full-face respirators with mercury vapor cartridges and HEPA filters available for use in an emergency. Respirators are used to protect employee health. They are inspected monthly. They are located in the small lockers in the hallway between the break room and the locker room in the unlocked units marked For Emergency Use Only

5) Protective Clothing – Tyvek
Tyvek full-body coveralls provide short-term protection against hazards such as fluorescent lamp powder (i.e. dust) and mercury particulates. Six suits are located in the small lockers in the hallway between the break room and the locker room in the unlocked units marked For Emergency Use Only

6) Eye Wash Stations
Three emergency eye wash stations are installed at the facility. Liquid mercury is considered to be corrosive if it is splashed into the eye. An eye wash is necessary to wash out eyes in the event of an emergency. They are located.
   1. Immediately north of the restroom on the east end of the facility
   2. Immediately south of the baler on the east wall at the south end of the facility
   3. Inside the north door in the lower building (E-waste/battery). This unit also has a drench hose attachment for safety purposes.

7) First Aid Kit
A commercially sold first aid kit is maintained at the facility. The contents will be used in the event of an accident. The Operations Manager ensures that it is complete. It is located in the restroom of the main office. The facility is also equipped with a portable first aid bag which is kept in the Operations Manager office should a situation require use of a portable unit.

8) Automated External Defibrillator (AED
The facility is equipped with one Automated External Defibrillator (AED) it is stored in the Operations Manager office on the east wall immediately after the entry door.

9) Mercury Vapor Detector
The Mercury Vapor Analyzer is available to monitor mercury vapor emissions in an emergency. The directions on how to operate the instrument are found in a file in the Supervisors office. The mercury detector is located in the

Supply room in the north side of the building adjacent to the break room. The detector is used to monitor internal mercury vapor concentrations. The unit is annually calibrated by Arizona Instruments, the manufacturer.

10) Access to Communication
A telephone is available which facility personnel could use to call 911 and summon emergency assistance.

11) Access to Alarm
The telephone system is equipped with a paging system which will alert all facility personnel to evacuate the building. The emergency coordinators can activate the paging system from any telephone in the facility. Should the telephone system not be available, the facility maintains one (1) megaphone and one (1) airhorn. Both are located in the Operations Managers office.

6.9 Evacuation Procedures

Veolia employees shall evacuate the building via the nearest exit (see Figures 2 and 3). Upon evacuation, all personnel shall meet at the designated evacuation point which is located in the driveway by the telephone pole. The EC shall account for all personnel on duty.

6.10 Notification Procedures

It is the responsibility of the Emergency Coordinator (EC) or designee to oversee all response actions and ensure that proper notifications are made. The EC shall notify all appropriate agencies after completing steps 1 and 2.

1. Identification of Released Material

   The EC shall immediately identify the character, exact source, amount, and extent of any released materials. The EC may do this by observation, review of facility records, or chemical analysis.

2. Assessment of Hazards

   The EC shall evaluate possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion; the effects of any toxic, irritating gases that are generated; and the effects of any hazardous surface water run-off from or chemical agents used to control fire and heat inducing explosions.

3. Evacuation

The EC shall be available to help appropriate officials decide whether the local areas around the facility should be evacuated.

The EC shall report releases in the order presented below.

6.10.1 Local – City and County

By calling **911,** Leon County's Division of Emergency Management will be contacted and informed of the situation.

6.10.2 State

Department of Environmental Protection

Veolia must comply with General Condition 16B of the Facility Permit. General Condition 16B states: "Notification of any non-compliance which may endanger health or the environment, including the release of any hazardous waste that may endanger public drinking water supplies, or the occurrence of a fire or explosion from the facility which could threaten the environment or human health outside the facility, **shall be verbally submitted to the Department within 24 hours and a written submission provided within15 days.** The verbal submission within 24 hours shall contain the name, address, I.D. number, and telephone number of the facility and owner or operator, the name and quantity of materials involved, the extent of injuries (if any), an assessment of actual or potential hazardous, and the estimated quantity and disposition of recovered material. The written submission shall contain the following:

1. A description of and cause of the non-compliance; and
2. If not corrected, the anticipated time the non-compliance is expected to continue and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance."

6.10.3 Other State Requirements

The EC will immediately notify the Florida DEP 24 Hour emergency response at 850-413-9911 of any release of (a) hazardous substance(s) from the facility in a quantity equal to or exceeding the reportable quantity (RQ) in a 24-hour period. **The RQ for Mercury is one pound.**

The Telephone number for the District FDEP is 850-595-8300 ext 1100, and during normal business hours calls 850-595-8360 ext 1253. The EC will report the following information:

1. Name, address, and telephone number of person reporting.

2. Name, address, and telephone number of person responsible for the discharge or release, if known.

3. Date and time of the discharge of release.

4. Type or name of substance discharged or released.

5. Estimated amount of the discharge or release.

6. Location or address of the discharge or release.

7. Source and cause of the discharge or release.

8. Size and characteristics of area affected by the discharge or release.

9. Containment and cleanup actions taken to date.

10. Other persons or agencies contacted.

Within **fifteen (15) days** after the emergency situation, the facility shall submit a written report to the Florida DEP which described the situation. The report shall include the following information:

1. Name, address, and telephone number of the facility owner or operator.

2. Name, address, and main telephone number of the facility.

3. Date, time, and type of emergency situation (e.g. spill, 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 the environment, where this is applicable.

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

6.10.4 Federal

The EC shall **immediately** notify the National Response Center (NRC) by using their 24-hour toll free number: 1-800-424-8802.

The person calling in the report shall include the following:

1. Name and telephone number of reporter.

2. Name and address of facility.

3. Time and type of incident.

4. Name and quantity of material(s) involved, to the extent known.

5. The extent of injuries (if any).

6. The possible hazards to human health or the environment outside the facility.

If the release is subject to SARA Title III requirements, then the emergency notice must be submitted which contains the following information:

1. The chemical name or identity of any substance involved in the release.

2. An indication of whether the substance is on the list of extremely hazardous substances.

3. An estimate of the quantity of any such substance that was released into the environment.

4. The time and duration of the release.

5. The medium or media into which the release occurred.

6. Any known or anticipated acute or chronic health risks associated with the emergency and, where appropriate, advice regarding medical attention necessary for exposed individuals.

7. Proper precautions to take as a result of the release, including evacuation (unless such information is readily available to the community emergency coordinator pursuant to the emergency plan); and

8. The name and telephone number of the person(s) to be contacted for further information.

6.11 Local Notification Requirements

The following local authorities were sent a copy of the Contingency Plan via certified mail or package delivery service where a signature is obtained document receipt. Each party is aware of the operation and has been invited to tour the facility.

Leon County Division of Emergency Management
301 South Monroe Street
Leon County Courthouse
P-301
Tallahassee, FL 32301
850-488-5921
(The Division will forward copies of this plan to police and fire authorities.)

Emergency Services Manager
Tallahassee Memorial Regional Medical Center
1300 Miccosukee Road
Tallahassee, FL 32308
850-681-5592

Director of Critical Care
Capital Regional Medical Center
2626 Capital Medical Boulevard
Tallahassee, FL 32308
850-656-5170

6.12 Arrangements with Local Authorities

After receiving and reading this document, local authorities and select DEQ staff become familiar with the facility layout, the properties, materials handled at the facility, associated hazards, processing areas with in the building, the evacuation point and types of injuries or illnesses that could result from fires, explosions, or releases at the facility. The Operations Manager personally called and invited local authorities to tour the facility and gain greater familiarity with the operations. Organizations identified in Section 6.11 were asked to review this plan and provide Veolia with a written response regarding any actions they may take responding to an emergency.

6.13 Mitigate Effects of Equipment Failure

Veolia management recognizes the importance of preventative maintenance. The lamp recycling system consists of two major components. The first is a crushing unit and the second is a distillation unit. Both units, and support equipment, have routine daily and/or weekly inspection and maintenance procedures. The support equipment is inspected and maintained per the suppliers recommendations by Veolia and/or qualified maintenance companies. Common repair/spare parts are available on-site for immediate use. Veolia maintains maintenance records for all of our lamp recycling equipment.

6.13.1 Prevent Hazards During Unloading

Veolia's mercury reclamation facility has two dock doors with dock levelers. The dock levelers can be adjusted to accommodate different sized trucks. All containers are moved from the truck into the building using either a pallet jack or forklift. Wheel chocks are used to prevent the truck from moving away from the dock.

6.13.2 Personal Protective Clothing

OSHA 1910.120 Subpart I addresses personal protective equipment (PPE). When exposure to hazards can not be engineered completely out of normal operations or maintenance work, and when safe work practices can not provide sufficient additional protection, a further method of control is the use of protective clothing or equipment. The reason for wearing personal protective equipment is to protect employees from potential health hazards associated with the chemical Veolia works with. PPE such as respirators, safety glasses, safety shoes, gloves, and coveralls are provided to each employee.

Veolia supervisors and operations employees are trained on the proper selection, use, and maintenance of PPE. Employees are trained on the hazards present in the work place and why the equipment is necessary, how it benefits the employee, and the limitations of each type of PPE. Employees become familiar with and comfortable wearing PPE. Veolia provides all employees the required PPE at no charge to the employees. Typical PPE used by Veolia employees are: full-face respirators with mercury cartridges and HEPA filters; safety glasses; safety shoes; gloves; and Tyvek suits.

Employees are properly trained on how to don and doff the equipment, how to wear it properly, how to test for proper fit, and end of service life markings on respirator cartridges. Proper fit is essential if the respirator is to provide the intended protection. All employees required to wear a respirator is fit tested.

Veolia adheres to and complies with 29 CFR 1910.134(b) regarding a written respiratory protection program. The written respiratory plan addresses the following elements: inspection, maintenance, cleaning, storage, training, work place evaluation, fit testing, and medical certification.

6.14 Preventing Releases

Veolia's facility is designed, operated, and maintained in a manner that ensures protection of human health and the environment. Our facility's design provides for environmental protections. Our processing equipment (the crusher-separator and distillation units) are enclosed in separate rooms for noise, dust, and mercury vapor control. The processing rooms are maintained under negative air-flow. The air stream from the crusher-separator first passes through a bag house and a HEPA filter to capture dust particles. The air stream then passes through sulfur impregnated carbon filters to capture mercury vapor from the processing equipment. Two carbon filters are also present for the distillation process.

Our technology captures approximately 99%, by weight, of all mercury which is processed by our lamp recycling technology. Consequently, we are able to significantly minimize mercury exposure to human and other environmental receptors.

On-site distillation of mercury phosphor powder eliminates the need to transport hazardous waste off-site. Our distiller separates the mercury from the powder and collects the elemental mercury in a liquid form. The extracted mercury is greater than 99% pure and is no longer classified as a waste. Liquid mercury will be shipped to Veolia approved facility in DOT approved flasks which are designed for transportation of mercury. By distilling on-site in a controlled environment, we have minimized exposure to human beings or any other receptors to a hazardous waste.

Veolia staff is very concerned about potential releases to the environment. We conduct daily facility and weekly hazardous waste storage area inspections of our facility and record them in a log book. We also test and maintain our communication and fire protection equipment to ensure proper operation at all times.

Veolia uses a portable Jerome Mercury Vapor Analyzer to monitor for mercury vapor within the facility. However, for the purpose of this plan the term Mercury Vapor Analyzer will be used to refer generically to any direct read mercury vapor meter with equivalent or greater sensitivity as the Jerome. Examples of other meters include the Ohio Lumex model RA 915 or Mercury Instruments model VM3000. We have selected multiple locations where we monitor for mercury vapor exposure. Monitoring is conducted every day the facility is operating.