CONTINGENCY PLAN

Document #: UW CP-009-02

Facility Environmental Program Documentation
Prepared in Agreement with
40 CFR 264.52 & 264.53

AERC ACQUISITION CORPORATION D/B/A
AERC RECYCLING SOLUTIONS, A CLEAN EARTH COMPANY
4317 J Fortune Place West Melbourne, FL 32904

Revision #: H | Revision Date: 9.03.2020 Prepared By: EH&S Clean Earth LLC

1.0 Purpose

1.1 The purpose of this Contingency Plan, prepared for the AERC.com, Inc., A Clean Earth Company - West Melbourne facility (AERC), is to establish guidance and procedures for facility personnel to minimize hazards to human health or the environment. Hazards include: fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water.

2.0 Scope

2.1 This plan applies to hazardous and universal waste management activities at the AERC facility located at 4317 J Fortune Place West Melbourne, FL.

2.2 USEPA ID Number FLD984262782 has been assigned to the site for the following universal waste (UW) and hazardous waste (HW) activities, respectively:

- UW Large Quantity Handler (LQH),
- UW Transporter,
- HW Large Quantity Generator (LQG), and
- HW Transporter (in agreement with 10-day transfer requirements).

2.3 The provisions of this Plan shall be carried out immediately whenever there is a fire, explosion or release of hazardous substance, which could threaten human health or the environment.

3.0 Definitions

3.1 ***Battery*** means a device consisting of one or more electrically connected electrochemical cells, which is designed to receive, store, and deliver electric energy. An electrochemical cell is a system consisting of an anode, cathode, and an electrolyte, plus such connections (electrical and mechanical) as may be needed to allow the cell to deliver or receive electrical energy. The term battery also includes an intact, unbroken battery from which the electrolyte has been removed. The common types of batteries managed by AERC include:

3.1.1 Category 1 - Lead Acid And Sealed Lead Acid Batteries;

3.1.2 Category 2 - Alkaline Or Nickel-Cadmium Batteries, Zinc Air, Carbon Zinc (Non-Mercury), Nickel Iron, And Nickel Metal Hydride Batteries;

3.1.3 Category 3 - Mercury, Mercuric Oxide, Carbon Zinc (With Mercury), Aton, And Button Cell Silver Oxide Batteries, and

3.1.4 Category 4 - Lithium, Lithium Ion and Magnesium Batteries.

3.2 ***Destination facility*** means a facility that treats, disposes of, or recycles a particular category of universal waste. AERC currently operates as a Destination facility.

3.3 ***Lamp,*** also referred to as ‘‘universal waste lamp’’ is defined as the bulb or tube portion of an electric lighting device. A lamp is specifically designed to produce radiant energy, most often in the ultraviolet, visible, and infra-red regions of the electromagnetic spectrum. Examples of common

universal waste electric lamps include, but are not limited to, fluorescent, high intensity discharge (HID), neon, mercury vapor, high pressure sodium, and metal halide lamps. AERC receives and handles all types of universal waste lamps, forwarding the materials to a sister facility in Allentown, PA for processing, i.e., recycling/recovery of mercury.

3.4 ***Mercury-containing equipment*** means a device or part of a device (including thermostats, but excluding batteries and lamps) that contains elemental mercury integral to its function. AERC receives and transports mercury-containing devices for further treatment at other off-site facilities.

3.5 ***Universal Waste*** *(with regard to activities at AERC)* means any of the following hazardous waste that are subject to the universal waste requirements of federal regulations set forth in 40 CFR Part 273:

3.6.1 Batteries as described in § 273.2,

3.6.2 Mercury-containing equipment as described in § 273.4; and,

3.6.3 Lamps as described in § 273.5.

3.6 ***Universal Waste Handler*** means the owner or operator of a facility, including all contiguous property, that receives universal waste from other universal waste generators and/or handlers, accumulates universal waste, and sends universal waste to another universal waste handler or destination facility. As a Large Quantity Universal Waste Handler, AERC accumulates 5,000 kilograms or more total of universal waste (batteries, mercury-containing equipment, or lamps, calculated collectively) at any time during the calendar year.

4.0 Responsibility

4.1 ***Emergency Coordinator*** is responsible for:

4.1.1 A listing of current AERC employees designated to act as Emergency Coordinator is detailed within form *Emergency Coordinator List* (Attachment 1).

4.1.2 Whenever there is an imminent or actual emergency situation, the Emergency Coordinator will immediately:

4.1.2.1. Activate facility alarms (or verify same has been done) to notify facility personnel of the emergency, and

4.1.2.2. Notify local emergency response agencies including the Brevard County Fire-EMS Department.

(See form *Emergency Notification Contact Summary* | Attachment 2.

4.1.3 Whenever there is a hazardous emission, discharge, fire or explosion, the Emergency Coordinator must immediately identify the character, exact source, amount and extent of emitted or discharged materials. This will be accomplished by observation or review of records and, if necessary, by chemical analysis.

4.1.4 During an emergency, the Emergency Coordinator must take all measures necessary to ensure that the emission, discharge, fire or explosion does not occur, reoccur or spread to other material at the facility. Such measures shall include, where applicable:

4.1.4.1. Stopping operations, i.e., the source of the release;

4.1.4.2. Containment, confinement and collection of released materials;

4.1.4.3. Removing or isolation of ruptured containers; and

4.1.4.4. Protection or isolation of nearby personnel and/or property that may be impacted by the release.

4.1.5 The Emergency Coordinator must ensure that adequate monitoring is conducted for leaks, pressure build-up, gas generation or ruptures of containers, wherever appropriate.

4.2 ***Facility Manager*** is responsible for:

4.2.1 Acting as the ***primary Emergency Coordinator*** in case of a facility emergency as discussed within this Plan.

4.2.2 Ensuring the safety and security of employees during the emergency and in the event of facility evacuation.

4.2.3 Ensuring the security of the company's property, including equipment, records and other legal documentation.

4.2.4 Coordinating site visits and reviews of the facility by local emergency authorities, including the inspection by the Brevard County Fire-EMS Department for fire code permit renewal.

4.2.5 Completing annual refresher training on this Plan and related emergency procedures.

4.3 ***Operations Supervisor*** is responsible for:

4.3.1 Acting as the ***secondary Emergency Coordinator*** in case of a facility emergency as discussed within this Plan.

4.3.2 Assisting the Facility Manager with the safety and security of facility personnel working during their shift.

4.3.3 Providing a headcount of operations staff and/or shift employees in the event of facility evacuation.

4.3.4 Inspecting facility emergency supplies and providing recommendations to the Facility Manager for the replenishment of such materials.

4.3.5 Assisting the Facility Manager in ensuring the security of the company's property, including physical assets and equipment.

4.3.6 Completing annual refresher training on this Plan and related emergency procedures.

4.4 ***Area EH&S Manager*** is responsible for:

4.5.1 Acting in a technical support role as discussed within this Plan.

4.5.2 Making notification to outside authorities as directed by the Facility Manager.

4.5.3 Providing assistance to the Facility Manager through coordination of resources and outside services to ensure the safety and security of employees during an emergency.

4.5.4 Coordinating and/or completing follow-up reporting to local authorities and government officials in the event of outside notification and/or response.

4.5.5 Directing detailed investigations and/or critiques in the event of a significant emergency involving loss of life, a reportable quantity release to the environment or substantial damage to physical property.

4.5.6 Reviewing this Plan annually and providing approval of updates as required.

4.5.7 Completing annual refresher training on this Plan and related emergency procedures.

Reviewing this Plan annually and coordinating the completion of necessary updates and 3rd-party notifications. The EHS Manager, with the assistance of the Facility Manager, will ensure a current revision of the Contingency Plan, i.e., the Plan, shall be maintained at the West Melbourne facility and will be submitted to local police departments, fire departments and state and local emergency response teams that may be called upon to provide assistance in response to an emergency.

Completing annual refresher training on this Plan and related emergency procedures.

4.5 ***Local Authorities and 3rd Party Service Providers*** are asked to:

4.7.1 Provide assistance to the Facility Manager and/or AERC's employees upon request during an emergency.

4.7.2 Take receipt of copies of this Plan; Review periodic updates to this Plan.

4.7.3 Conducting periodic site visits and/or inspections as required by local ordinances or regulations of the State of Florida, or as deemed necessary and appropriate by the individual authority.

4.7.4 Participate in facility drills or related Plan evaluations (as may be requested by the Facility Manager).

4.6 ***Employees*** are responsible for:

4.8.1 Knowing how to identify and respond to an emergency situation in their area, including how to initiate emergency response and contact personnel as detailed on form *Emergency Notification Contact Summary* (Attachment 2).

4.8.2 Reporting to the Facility Manager or his designee upon evacuating the facility as required by the *Emergency Action and Evacuation Plan*.

4.8.3 Reading and understanding this Plan.

4.8.4 Participate in facility drills or related Plan evaluations.

4.8.5 Knowing the location of all emergency exits and primary mustering point.

4.8.6 Knowing the location of fire extinguishers, eye wash station(s) and other facility emergency equipment including fire alarm pull stations.

4.8.7 Employees who are hosting Visitors will ensure that such persons receive an emergency evacuation briefing prior to beginning work.

4.7 ***Visitors*** are required to:

4.9.1 Document their entry to the facility by signing into the Visitor Log Book.

4.9.2 As coordinated by your AERC employee point-of-contact, obtain the required facility overview and emergency evacuation briefing as required by this Plan.

4.9.3 If an evacuation is necessary, follow all emergency evacuation procedures as instructed by their AERC point-of-contact.

5.0 Summary of Facility Hazards

5.1 The universal waste materials managed by AERC, as defined in Section 3.5, exhibit a variety of potential hazards. The following discussion provides a summary of the associated primary hazards for the most common materials managed by AERC. This information serves as reference documentation for emergency response personnel. It does not replace formal hazard communication documentation and/or training that is offered to AERC employees.

5.1.1 Mercury: Is commonly found as an activator within fluorescent lamps and/or other lighting devices. It is also found in liquid metallic form within mercury-containing devices. Mercury will volatilize at ambient temperatures presenting an inhalation exposure hazard. Exposure to mercury may occur during the handling of universal wastes containers or during on-site processing through the LSS1 recycling unit.

5.1.2 Sulfuric Acid: As a key component of lead-acid batteries it is one of primary hazards found at AERC. As a corrosive liquid, “battery acid” represents a potential dermal/splash hazard that may result upon release from a damaged battery casing. A secondary, albeit key, component of this category of universal waste is lead. As a solid, contained part of these manufactured articles handled by AERC it represents limited potential for exposure or release to the environment.

5.1.3 Other Materials: To a lesser degree, based on material type and volume, the other universal wastes managed by AERC present potential hazards. These materials, received and managed as spent manufactured articles, are inspected and repackaged, stored/accumulated and/or transported off-site for recycling/processing.

5.1.3.1. Low-Pressure Sodium Vapor Lamps: Contain sodium metal that can react with moisture presenting a reactivity/fire hazard. This hazard may result if a container of lamps is damaged and lamps are broken.

5.1.3.2. Lithium-ion Batteries: Contain lithium metal that can react with moisture presenting a reactivity/fire hazard. This hazard may result if an individual cell is damaged.

5.1.3.3. Nickel-Cadmium Batteries: (NiCd) Contain cadmium metal that is noted by NIOSH to be a potential carcinogen and nickel that is a non-combustible solid that can be flammable as a powder/dust.

5.1.3.4. Potassium Hydroxide: A common electrolyte found in Category 2, e.g., wet-cell NiCd, batteries. Some of these batteries can be of significant size containing several gallons of electrolyte.

5.1.4 10-Day Transfer Facility Materials: As noted, AERC is a Transporter of hazardous waste (as well as other DOT-regulated material). In operating under the 10-day transfer requirements, AERC does not routinely inspect nor repackage these materials during transportation activities. These materials, which are commonly transported to the AERC Allentown facility, include:

- Mercury-containing manufactured articles and devices. Other characteristic hazardous wastes (D009 code) - hazards as detailed above (Section 5.1.1).
- Polychlorinated Biphenyls (PCBs) may be present in older equipment (circa 1980) such as fluorescent lighting ballasts and electronic equipment transformers and/or capacitors. These devices are received and transporter in conjunction with lamp recycling activities. PCBs are commonly light yellow to colorless thick, oily-liquids that are probable carcinogens and teratogens in humans. Contact with PCBs should be limited | PPE required.

5.2 Communication of potential hazards is done in agreement with AERC's Hazard Communication Plan HS-001 (per OSHA 29 CFR 1910.1200). Specifically, AERC identifies specific areas of the warehouse with markings, labels or signs to indicate the types of materials stored within each area. The hazards associated with the stored materials will be communicated to facility and emergency response personnel using a combination of NFPA markings, DOT ID numbers and common chemical names and/or descriptions.

6.0 Emergency Response Procedures

6.1 FIRE and/or EXPLOSION

6.1.1 Primary efforts will be placed on preventing fires from occurring and stopping incipient stage fires from spreading to nearby areas. AERC's facility personnel will control such small-scale fires using portable fire extinguishers.

6.1.2 The following actions will be immediately taken in the event of a fire or explosion:

6.1.2.1. Call 911 for Fire, police and emergency personnel.

6.1.2.2. Facility operations will be shut down.

6.1.2.3. All AERC personnel will be notified of the emergency via activation of the nearest alarm pull station.

6.1.2.4. If not already on the scene, the Emergency Coordinator will be contacted.

6.1.2.5. The Emergency coordinator shall designate an employee, that will ensure the facility is cleared of all personnel in the event of an evacuation. All facility personnel are responsibile to ensure all fire doors and fire suppression system doors are shut as they clear the facility.

6.1.2.6. Facility personnel shall remove any injured personnel. First aid trained personnel will administer medical treatment as necessary.

6.1.2.7. If it can be accomplished safely, air inside and/or outside the building will be monitored for mercury. If levels of mercury are detected greater than the OSHA PEL, response personnel will be notified to ensure appropriate action, i.e., use of respiratory protection, is taken.

6.1.2.8. If there are elevated levels of mercury outside the building, monitoring will continue at frequent intervals down wind to determine attenuation levels. This information will be reported to the local and county authorities to aid in emergency response measures.

6.1.3 Early containment of fires can significantly decrease injury and total property damage, incipient stage fire fighting will only be performed by trained employees if they feel it is safe to do so. No one should ever attempt to fight a fire at the risk of injury to themselves or others. Plant evacuation will be initiated by the emergency response coordinator as necessary in case of a major fire or explosion. Personnel are trained in evacuation procedures.

6.1.4 When the fire has been extinguished, either an incipient stage fire or full-scale event requiring evacuation, the Emergency Coordinator will coordinate the evaluation of the incident with the assistance of local authorities.

6.2 SPILL or MATERIAL RELEASE

6.2.1 All materials handled at AERC are most commonly containerized, i.e., non-bulk quantities, or packaged as the original manufactured-article (such as a large sealed lead-acid battery). As such, a spill/release will likely involve only a single container, be of limited quantity and contained within the immediate area of the stored container. Containment pallets are commonly used for liquid-containing materials such as lead-acid batteries to aid in minimizing the impact of such spills.

6.2.2 If an employee discovers a chemical spill or a malfunctioning piece of equipment causing a release of hazardous materials, he or she will immediately report it to the Facility/Shift Supervisor. In turn, the Supervisor will contact the Emergency Coordinator and/or assume command of the initial response.

6.2.3 When contacted, the Emergency Coordinator will obtain information regarding the severity of the incident, including:

6.2.3.1. Determination if any personnel have been injured.

6.2.3.2. The nature of the malfunction and/or cause of the release.

6.2.3.3. The material spilled or released.

6.2.3.4. The location of the incident.

6.2.3.5. An estimate of the quantity released.

6.2.3.6. The direction in which the spill, vapor, dust or smoke is heading and likelihood of harm to personnel and/or adjoining property or equipment.

6.2.3.7. The possibility of escalation of the incident including possible fire/explosion or release outside of the facility.

6.2.4 The first person to identify the release will assess the magnitude and potential severity of the spill or release and report it to the emergency coordinator. If the incident is determined to be within AERC's emergency response capabilities the necessary facility personnel will be contacted and deployed. If the accident is beyond AERC's capabilities, the Emergency Coordinator will contact the appropriate authorities and outside contractors. Key criteria for making such a capability assessment include:

6.2.4.1. <u>Identity of the spilled material</u>: Materials that are highly toxic or expected to be in concentrations that displace oxygen to levels < 19.5 % shall require 3rd-party assistance.

6.2.4.2. <u>Spill volume</u>: The volume of material spilled and availability of necessary response supplies to confine, contain and adequately clean-up the spill must be considered.

6.2.4.3. <u>Other Factors</u>: Potential for additional hazards, impact on nearby areas and/or escalation of the event.

6.2.5 The initial response to such an emergency will be to identify, isolate, contain and treat the individual container and spilled material. The Emergency Coordinator will direct personnel to:

6.2.5.1. Use available emergency supplies, including: absorbent pads, booms or other inert materials to **C**onfine, **C**ontain and **C**lean-up the release. See Attachment 4.1, *Emergency Equipment List*, for a summary of available emergency supplies

6.2.5.2. Instruct primary actions to take in the case of the spill of common materials handled by AERC as additionally detailed in Attachment 4.2.

6.2.5.3. Place all containment and clean-up supplies into appropriate DOT-approved containers for proper off-site management. Such containers will be

appropriately marked/labeled to identify the contents in agreement the waste characterization of such spill residuals.

6.2.6 The Emergency Coordinator shall manage the incident to ensure all precautions are taken, including monitoring for leaks, pressure build-up, gas generation or ruptures of containers, as appropriate.

6.2.7 If the spill results in the formation of toxic vapors that are being dispersed off the property, as may result from the release of mercury-containing material, the facility will be evacuated to an area an appropriate distance upwind. Adjoining industrial properties and other populations that are considered potentially at risk will be notified as deemed necessary and appropriate by the local authorities.

6.2.8 As can be safely accomplished, air inside and/or outside the building will be monitored for mercury. If levels of mercury are detected greater than the OSHA PEL, response personnel will be notified to ensure appropriate action, i.e., use of respiratory protection, is taken.

6.2.9 If there are elevated levels of mercury outside the building, monitoring will continue at frequent intervals downwind to determine attenuation levels. This information will be reported to the local and county authorities to aid in emergency response measures.

6.2.10 AERC personnel will assist Brevard Fire-EMS Emergency Response Teams (ERTs) as directed by these authorities upon their assumption of incident command.

6.3 EMERGENCY EVACUATION

6.3.1 The Emergency Coordinator is responsible for determining which emergency situations require facility evacuation. The telephone system will be used to notify facility personnel as to the nature of the emergency and the recommended plan of action.

6.3.2 Facility evacuation routes are indicated on the attached floor plan (See Attachment 5 – *Evacuation Floor Plan*).

6.3.3 In the event the Emergency Coordinator calls for facility evacuation, the following actions will be taken:

6.3.3.1. The call for evacuation will be given via activation of an alarm, announcing the need to initiate facility.

6.3.3.2. All personnel, visitors and contractors will immediately leave the building through the shortest and safest designated evacuation route.

6.3.3.3. Once evacuation is initiated, Employees shall assist contract personnel and/or visitors in leaving the facility and ensuring that these persons are accounted for during facility headcounts.

6.3.3.4. No further entry of visitors, contractors or trucks will be permitted. All vehicle traffic around the facility will cease to allow safe evacuation.

6.3.3.5. The Facility Manager, or his designee, shall make appropriate notifications to neighboring facilities.

6.3.3.6. No persons shall be allowed to re-enter the facility unless specifically authorized by the Emergency Coordinator. Those personnel remaining within the facility will only include duly authorized emergency response team members.

6.3.3.7. No persons shall be allowed to re-enter the facility unless specifically authorized by the Emergency Coordinator.

6.3.3.8. All persons will be accounted for by the Regional Services Coordinator and/or Facility/Shift Supervisor. No AERC personnel shall be allowed to endanger their own lives or those of other personnel in an attempt to find unaccounted persons. It is the responsibility of the Fire Department to find missing persons.

6.3.3.9. Re-entry into emergency areas will be made only after the Emergency Coordinator gives "all-clear."

7.0 Reporting Requirements

7.1 The type and quantity of material released during an incident will determine the specific reporting requirements to be followed, including:

7.1.1 RCRA and the Florida Department of Environmental Protection (FLDEP) for releases of hazardous wastes.

7.1.2 Superfund Amendments and Reauthorization Act (SARA) for releases of reportable quantities of extremely hazardous substances (EHS).

7.1.3 Comprehensive Environmental Responsibility and Cleanup Act (CERCLA) for releases of reportable quantities of CERCLA Hazardous Substances.

7.2 The following specific reporting procedures shall be followed for emergency incidents involving the release/potential release of hazardous materials that threaten human health and/or the environment outside the facility. The Emergency Coordinator will immediately:

7.2.1 Notify appropriate local authorities if an assessment indicates evacuation of local areas is advisable; and

7.2.2 Notify the Florida Department of Environmental Protection (FLDEP); and

7.2.3 Notify the National Response Center if it is determined that the release is of a reportable quantity (RQ) of any CERCLA hazardous substance;

7.2.4 Notification calls shall be made as detailed on form Emergency *Notification Contact Summary*.

7.2.5 Report the following information:

7.2.5.1. Name of person reporting incident;

7.2.5.2. Name, EPA ID Number and location of the facility;

7.2.5.3. Phone number where the person reporting the incident can be reached;

7.2.5.4. Time of the incident;

7.2.5.5. Brief description of the incident, nature of the materials involved, extent of any injuries and possible hazards to human health and the environment;

7.2.5.6. The estimated quantity of material involved;

7.2.5.7. The extent of known or suspected contamination of land, water or air;

7.2.5.8. An indication of whether the substance is an extremely hazardous substance (EHS);

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

7.3 Immediately after an emergency, the Emergency Coordinator will:

7.3.1 With FLDEP approval, provide for treating, storing or disposing of residues, contaminated soil, etc., resulting from response to the incident;

7.3.2 Ensure that, in the affected areas, no incompatible materials are treated, stored or disposed of until cleanup procedures are completed;

7.3.3 Emergency equipment utilized during the response is cleaned and fit for its intended use prior to resuming operations.

7.3.4 Ensure that emergency equipment decontamination is performed using appropriate decontamination agents and practices.

8.0 Employee Training

8.1 New AERC employees will be trained on the contents of this procedure during their company orientation briefing and initial job training. This briefing will be accomplished during the first days/week of an employee's work assignment with AERC.

8.2 The scope of overall training programs is based upon the need of a specific regulatory requirement, plan or procedure. As such, employees will be instructed upon their responsibilities in the event of an emergency condition detailed within this Plan.

8.3 The frequency and cross-section of personnel receiving training, for this program and all other required activities, is detailed within the Clean Earth *Health, Safety and Environmental Training Matrix*.

8.4 Drills, which will be conducted no less than annually, a critique of these drills shall be documented to identify possible retraining opportunities or if the procedures need to be revised.

8.5 Additional training exercises will be performed by the emergency response personnel to familiarize both AERC and local responders with the facility and potential hazards.

8.6 Exercises, drills and real scenarios will all be documented.

9.0 Exhibits

- Attachment 1 - *Emergency Coordinator List*
- Attachment 2 - *Emergency Notification Contact Summary*
- Attachment 3 – Facility Hazard Supplemental Information
- Attachment 4.1 – Emergency Equipment List
- Attachment 4.2 – Common Material Cleanup Procedures
- Attachment 5 – Evacuation Floor Plan

10.0 Distribution

10.1 Hard Copies –

- Facility Manager
- Brevard County Fire·EMS
- Brevard County Police Department
- Florida Department of Environmental Protection
- East Central Florida Local Emergency Planning Committee (LEPC)
    a. 455 North Garland Avenue Orlando 32801 (407) 245-0300 ext. 317
    b. Michelle Cechowski michelle@ecfrpc.org

Emergency Contact:	***Position:***	***Phone:***
Primary Contact: ***Gerry Lanza*** *Office:* *4317-J Fortune Place* *West Melbourne, FL 32904*	Facility Manager	Cell: 407.495.8061 Office: 321.952.1516
Secondary Contact: ***Hector Rodriguez*** *Office:* *4317-J Fortune Place* *West Melbourne, FL 32904*	Production Lead	Cell: 321.720.4072 Office: 321.952.1516
Technical Contact Area EH&S Manager: ***Bryan Jones*** *Office:* *402 Webster Chapel Rd.* *Glencoe, AL 35905*	Area EH&S Manager	Cell: 205.405.3042 Office: 256.492.8340 x105

Attachment 2 | *Emergency Notification Coordinator List*

Agency |Outside Authority	***Description | Affiliation***	***Telephone Number***
National Response Center	Reportable Release	800-424-8802
Florida Division of Emergency Management	Office of Emergency Response(OER) DEP-Orlando District Emergency	800.320.0519 407-893-3337 850-413-9911
Fire – EMS Brevard County	Emergency | Non-emergency	911 | 321-633-2056
Ambulance Brevard County	Emergency |Non-Emergency	911 | 321-633-2056
Police	City of West Melbourne	911 | 321-723-9673
Sheriff	Brevard County	321-633-7162
Hospital	Holmes Regional Medical	321-434-7298
Brevard Emergency Operations Center	24 hour	321-633-1770
Verisk (3E) ***Emergency Response Provider***	Primary Hazmat Responder - Roadside	800.451.8346 ER# 15863
Veolia North America	3rd Party Response	321-722-2455
Florida Power and Light	Electric Power Emergencies	800-226-3545
Public Works	Water and Sewage Emergencies	321-727-3710
Poison Control Center		800-552-6337
Adjacent Properties:	Atlas Van Lines	321-676-0050

Attachment 3

Facility Hazard Supplemental Information

The information contained within this attachment presents additional safety data for the safe handling and response to releases of each of the general hazardous materials detailed in Section 5.1. Information presented here-in is separated as detailed within the following contents summary.

Mercury

- Mercury Lamp SDS
  - Mercury Hazard Data Sheet

Lead

- Lead-Acid Battery SDS
  - Sulfuric Acid Hazard Data Sheet
  - Lead Hazard Data Sheet
- CRT Glass SDS

Other Materials

- Low-Pressure Sodium Lamp SDS
  - Sodium Hazard Data Sheet
- Lithium-ion Battery SDS
  - Lithium Hazard Data Sheet
- Nickel Cadmium Battery SDS
  - Nickel Hazard Data Sheet
  - Cadmium Hazard Data Sheet
- Potassium Hydroxide Data Sheet [material found in wet-cell (Category 2) batteries]
- Polychlorinated Biphenyls (PCBs) Data Sheet [material found in lighting ballasts]

Attachment 4.1

Emergency Equipment List

Item:	***Physical Description & Capabilities:***	***Location:***
Vermiculite	A non-combustible, inert packaging and adsorbent used to pack small containers for shipment.	Loading Dock/Warehouse
Absorbent Pads	A synthetic fiber material specifically designed to absorb oils and hydrocarbons. Used for spill containment and clean-up.	Warehouse
Shovels, Brooms, Other Hand Tools	Used in the pickup or distribution of adsorbents during spill clean-up.	Warehouse
DOT Shipping Containers	USDOT-spec containers for off-site shipment, including over packing of materials, e.g., 55-gallon drum placed into 85-gallon over-pack.	Warehouse
HgX	Salt/Chelating Agent – Mercury Decontamination Powder used in solid form or as a solution	Spill Kit Area
Mercury Spill Kit	Mercury spill cleanup kit (1-gallon capacity) containing Mercury Magnet adsorbent.	Spill Kit Area
HAZORB® Acid | Caustic Neutralizing Agents	Neutralizing agent used for buffering small quantity spills of acids or caustic solutions.	Spill Kit Area
Class ABC Type Portable Fire Extinguishers	Used for incipient-stage fires of the following types: Class A (Combustible Materials); Class B (Flammable/Combustible Liquids); and Class C (Electrical Equipment).	See Building Floor Plan
Air-Purifying Respirator Cartridges	Negative pressure filter cartridge filled with activated carbon adsorbent. Specific cartridges are used for acid gases, mercury vapor and dust/particulates.	Cartridges and associated APR's issued individually to employees
Tyvek® Coveralls | Gloves	Acid/Solvent chemical-resistant disposable clothing for protection of personnel during hazardous material spill response.	PPE Locker
First Aid Kit | Blood-borne pathogens Kit | Safety Eye-wash	Basic first aid supplies and incident response – employee decontamination.	See Building Floor Plan

Attachment 4.2

Baseline Spill Response Work Instructions

Clean up Procedures

The Emergency Coordinator (EC) will direct cleanup any resultant spills or contamination from the Event. The EC will work with all appropriate agencies to ensure that work is performed to their satisfaction.

Before reopening the facility, the coordinator will ensure that all affected areas have been cleaned, remediated, or decontaminated as appropriate. The EC will direct personnel to ensure that all emergency equipment has been decontaminated or replaced and shall notify local authorities that such action has been taken and that the facility is to reopen.

General Guidelines - All Employees

- Keep calm; Think; Avoid panic and confusion.
- Know all exit locations. Be sure you know the safest and quickest way out of the facility.
- The EC and the emergency support personnel must have visual access to all areas to ensure that the facility is clear of personnel.
- Do not delay evacuation of the facility and adjacent areas for any reason. Do not stop or divert your route to secure personal belongings.
- Do not assist in fire control unless properly trained and qualified.
- When evacuating the facility, WALK to the nearest safe exit. Report to the safe area, i.e., "the mustering point," away from the facility and wait for instructions from the EC or a company official.
- Keep out of the way, stay clear of the facility and DO NOT interfere with emergency operations.

DO NOT re-enter the facility until instructed to do so by the EC or a company official.

Be a "buddy." As you leave the facility, take a quick look around to ensure that everyone heard the instructions to evacuate.

Emergency Procedure – HANDLING SMALL SCALE CHEMICAL SPILLS

If the hazardous material spill is of a small volume, i.e., less than one liter or a few gallons, and has a hazard rating below 2 in all hazard categories, the following procedures should be followed (i.e. mineral oil):

When a small scale chemical spill occurs:

- Restrict access to area.
- Immediately notify the Operations Supervisor and others in the area of the spill.

- Mark the area to prevent others from coming in contact with the spilled material.
- Contact the EC or secondary EC. Inform them to the:
- Name of chemical
- Quantity spilled
- Location of spill
- Obtain an MSDS for material. Refer to the chemical's MSDS or material data sheets found in this Plan for spill clean-up instructions. It is required that a MSDS be kept available for each chemical used.
- Review the MSDS Section on Precautions for safe handling and use.
- Use recommended Personal Protective Equipment. A minimum of nitrile gloves and safety glasses is required.
- Follow other precautions listed in MSDS.

General Procedures:

Simple acid and base spills should be neutralized with an appropriate neutralizing agent:

1. For acid spills (Sulfuric acid)

- Sodium bicarbonate, sodium sesqicarbonate or other derivatives are acceptable.

2. For basic spills (Potassium hydroxide)

- Citric acid or an acidic cleaner would be a suitable neutralizing agent.

3. Allow the spill time to neutralize (i.e., wait until the bubbling reaction stops.)

4. When using a neutralizing spill kit, these kits are buffered and will not have a bubbling action. Be careful not to over-neutralize.

5. Test the pH of the floor after the neutralization reaction has stopped with pH paper. Once a pH of between 6 and 9 has been achieved, the material can be transferred into an appropriate container for disposal. Residuals from the cleanup of spilled acids/alkalis should be placed in poly containers.

6. The container will then be marked with the "Hazardous Waste" label appropriately identifying the material hazard and contents, e.g., "Neutralized Battery Acid"

Emergency Procedure – LIQUID MERCURY SPILLS

Mercury spills require special clean up procedures. Follow these instructions and utilize a specialized Mercury Spill Kit when dealing with mercury spills.

1. EVACUATE THE SPILL AREA: If people were in the room when the spill occurred, be sure that their shoes, clothing, and other articles have not been splashed with mercury before they leave the room. If mercury has contaminated any clothing or articles, remove these items from the person and place them in a plastic bag. Keep everyone else, especially children and pets, out of the spill area to prevent tracking.

2. TURN OFF CENTRAL VENTILATING OR AIR CONDITIONING SYSTEMS that could circulate air from the spill area to other parts of the home or building.

3. LOWER the TEMPERATURE of the room/area if possible, e.g., however, DO NOT TURN ON THE cooling system. The cooler the temperature - the fewer mercury vapors will be released into the air. Mercury vapors are odorless and colorless.

4. CLOSE INTERIOR DOORS leading to other rooms, but VENTILATE THE ROOM CONTAINING THE SPILL TO THE OUTDOORS by opening windows and any exterior doors. Place fans, facing out, in open windows or doors to speed up ventilation.

5. Use the MERCURY MAGNET™ Spill Kit. Instructions for clean-up are located on the Mercury Spill Kit container (copy attached after this page).

6. For broken mercury thermometers, clean up spilled mercury as described above and place collected glassware/metal ware device components, i.e., mercury and broken thermometer, in a sealable plastic bag or lined plastic pail (DOT-shippable) for disposal.

7. Contact the EC.

8. For larger mercury spills, e.g., greater than a single thermometer, contact the EC. A prolonged cleanup action or one within a poorly ventilated area MUST BE MONITORED ON AN ON-GOING BASIS using a Jerome Mercury-vapor analyzer or similar device.

Emergency Procedure – RELEASE OF MERCURY VAPORS

If there is a release of mercury vapor outside of the facility that is above the OSHA permissible exposure limit (0.025 mg/M3), we will notify our neighbors of the situation and make notification to the DTSC Duty Officer and Ashland Fire Department. AERC will take all necessary action to mitigate the release. AERC will monitor the air for mercury vapor inside and outside of our facility as well as inside of our neighbor's facility until the vapor levels are abated.

Emergency Procedure – LEAD ACID BATTERIES

Safety Equipment:

- Soda Ash
- Plastic shovels/scoops/dust pans
- Safety glasses with face shield
- Nitrile gloves - 2 pair

Immediate Action:

- Tend to any medical emergencies

- Don protective material. DO NOT touch any spilled material with unprotected hands or approach with unprotected eyes.
- Stop the lead if it is safe to do so, i.e. upright battery, over pack battery, etc.
- Absorb all spilled material with bentonite or other inert, inorganic absorbent
- Neutralize the floor by wiping the floor with rags with a soda ash solution on them.
- Sweep and remove all soda ash and place in the drum with the leaking battery.

Emergency Procedure – CRT GENERAL SAFE WORK PRACTICES

- Inspect packaging materials for shipping integrity prior to moving the pallet
- Repack or apply more shrink wrap if required
- Follow all safe lifting practices, such as use of legs rather than the back
- Inspect all units to look out for broken glass or sharp protrusions

CRT Clean up

CRT's are to be packaged in a manner to prevent breakage. Additionally, during disassembly, AERC has a strict process to minimize breakage of the CRT. Should breakage occur, it must be contained immediately to prevent contamination and minimize employee exposure. The CRT glass must be placed in a sift proof, leak proof container with a lid, such as a cubic yard box with a liner, or a drum with a lid. The small glass pieces must be swept and if required, utilized tape to pick up small shards. DO NOT use a hose to wash broken materials into drain. The container must be marked as Universal Waste CRT Glass, and the earliest received date of the CRT. The material will be shipped off-site for proper recycling. Proper PPE to be worn includes: Dust mask, leather or similar gloves and safety glasses at a minimum. DO NOT sweep up small pieces with your hand. Use a small broom and dustpan.

Basic equipment for spill clean-up includes:

- Hand brooms
- Dust pans
- Particulate face mask
- Leather or comparable gloves
- Containers with lids

Procedure:

- Alert Site Supervisor
- Assess the amount of material spilled
- Don proper PPE
- Use hand broom and dustpan to collect the spilled material
- Place the collected material into a container with a lid
- Mark the container as appropriate

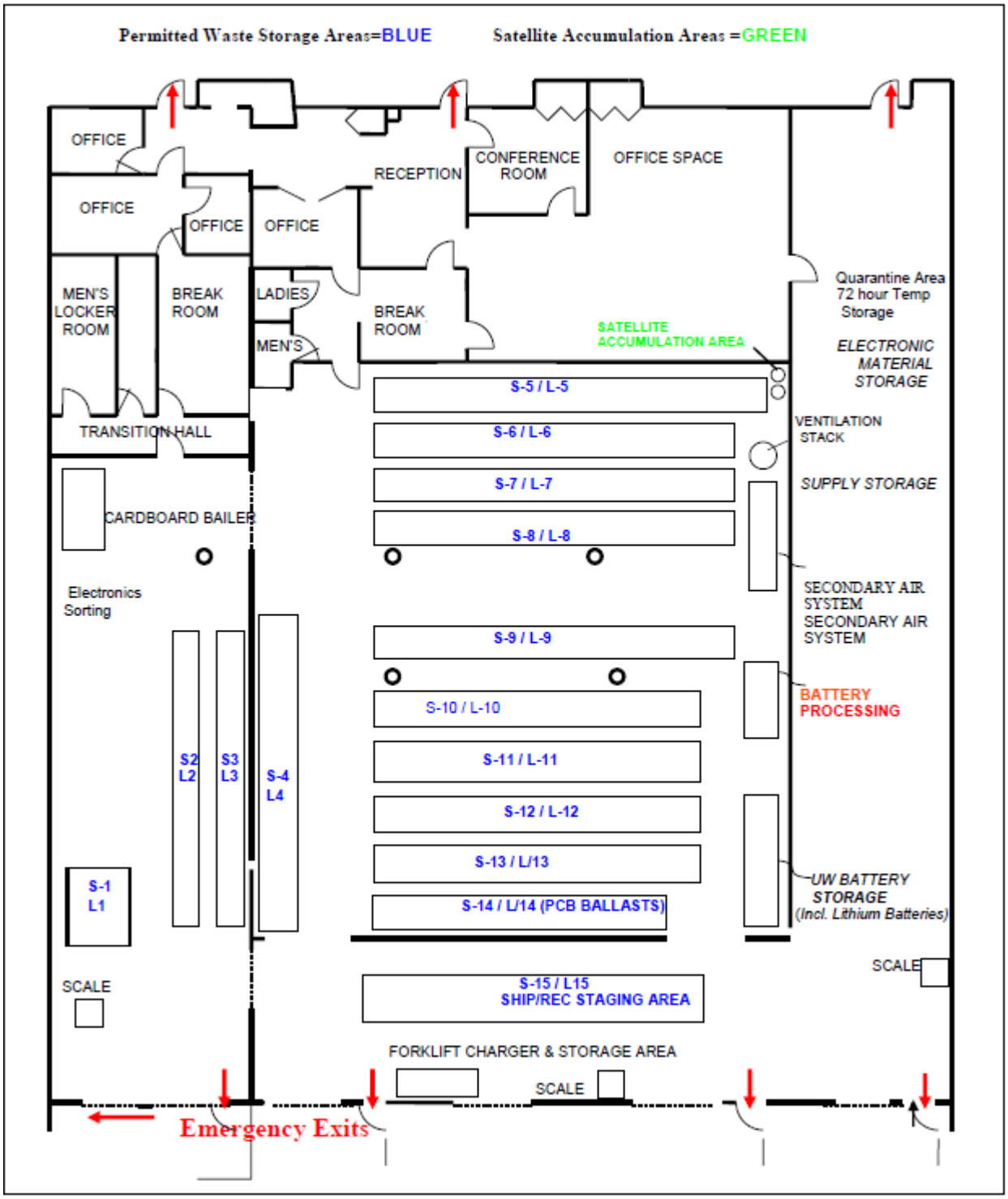
Emergency Procedure – BALLAST, TRANSFORMERS, CAPACITORS, PROJECTION TV MINERAL OIL

The response to a leaking PCB ballast (or related electrical device leak) will be to identify, isolate, contain and treat the individual item/container and spilled material. The EC will direct personnel to:

- Use available emergency supplies, including: absorbent pads, booms or other inert materials to confine, contain and clean-up the release.
- Use proper personal protective equipment to clean up a PCB ballast leak. The PPE shall include:
  - AERC work uniform.
  - Tyvek® coveralls.
  - Neoprene outer-gloves over Nitrile® inner-gloves.

Place all containment and clean-up supplies into appropriate DOT-approved containers for proper management.

Cleanup residual PCB oil that may be on the floor/concrete after ballasts have been picked up and repacked:

- Use a small plastic scraper to remove as much visible oil and/or potting paste as possible.
- Place the scraped material into a plastic bag with the leaking ballast (s).
- Double wash/rinse all contaminated surfaces using a mixture of 5% solution of trisodium phosphate and water. Wipe down all potentially contaminated surfaces as necessary – placing the collected liquids and wipers containing PCBs into a plastic bag within the collection container.
- Place any contaminated PPE or cleanup supplies into the collection container. Use as small of a DOT-approved container as possible to adequately contain the ballast(s) and cleanup residuals.
- Ensure complete decontamination by conducting the collection of smooth surface wipe samples to detect the presence of residual PCB contamination. Sampling will be conducted in agreement with the minimum, U.S. EPA wipe-testing protocol (as follows):
- A standard-size template (10-cm square) should be used to present the area to be cleaned.
- Use a gauze or steel wool pad saturated with hexane. NOTE: Hexane is a volatile solvent. Proper PPE must be worn. The wipe sample must be collected quickly to limit evaporation of hexane from the saturated pad.
- The area, including a one-foot buffer surrounding the area of visible contamination, must be cleaned and sampled. If the area that is contaminated is outside the confines of the building, i.e., soil, the area must be excavated and filled with clean soil.
- EPA guidance shall be referenced for additional information with regard to the completion of post cleanup sampling.
- Once sampling is complete – any potentially contaminated sampling materials shall be placed into the collection container(s).

Attachment 5 | *Evacuation Floor Plan*