

ATTACHMENT 6

EMERGENCY PREPAREDNESS, PREVENTION & CONTINGENCY PLAN

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1.0 Introduction

1.1 Purpose

The goal of this emergency plan is to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden releases to soil, or surface water. The provisions of this plan will be carried out whenever there is a fire, explosion, or release of oil, which could threaten human health or the environment. A copy of this plan and any revisions will be maintained at the facility and submitted to local police, fire department and hospital, that might be called upon to provide emergency services.

1.2 Areas of Concern:

- Transportation of recyclable materials to storage and unloading areas
- Transportation and unloading of used oil
- Tank storage area
- Solid waste handling and solidification - bulk and drums

1.3 Responsibilities

The Primary Incident Coordinator (PIC) must be familiar with this Plan, operations and activities at the facility, including the location and characteristics of used oil, the location of records, and the facility layout. The PIC or his/her designee is responsible for modifying this plan, as needed, to reflect changes in facility operations and/or county, state, or federal regulations. The PIC is responsible for ensuring that Howco employees are familiar with the content of this plan and are able to implement it, if needed and responsible for ensuring that this plan is posted and accessible to Howco employees. The PIC is responsible for implementing the plan in the event of an emergency and/or accidental release of material/waste. In the absence of the PIC, the Secondary Incident Coordinator (SIC) will be responsible for implementation.

After each emergency, this plan shall be reviewed and revised as necessary in the event of the plan's failure, the lack of pertinent information within the plan or any other identified problem associated with the plan.

2.0 GENERAL INFORMATION

Facility Name: HOWCO
Location: 24133 State Road 40, Astor, Florida
Telephone No.: (352) – 598 -7096

Facility Activities: HOWCO is a used oil processing facility that can operate 24 hours per day, 7 days per week. Used oil, oil filters, antifreeze and petroleum contact water are collected from various clients. The materials are delivered to the facility and tested. Based on the test results, the materials are transferred into holding tanks, processed, and then shipped to suppliers and/or disposal/recycling facilities.

3.0 Spill Prevention and Emergency Preparedness

Prevention of spills is accomplished through careful handling of raw and waste material and products, frequent inspection of transport systems and storage facility and strict observation of safety during material transfers. The operations are reviewed in terms of existing procedures and spill potential

General Spill Prevention Measures

- Employees handling containers are responsible for inspecting damaged containers and seals during handling, reporting any damages found and removing damaged containers from further use.
- Employees must properly stack the drums and other containers

Material Transport and Transfer

- . Drivers are responsible for the guarding against overfilling tanks and containers.
- . Tanks are considered full at 90% of total volume.
- . Pumps must be attended while in operation.
- . Pumps, pipes, hoses, gaskets, and connections are inspected for wear by the responsible supervisor.
- . Waste is to be placed in appropriate approved containers.

Prevention and Protective Measures

- Proper and safe work behavior practices
- . Provision and use of proper equipment and facilities
- . Continual assessment of potential hazards
- . Provision and use of proper Personal Protective Equipment (PPE)
- . Effective training
- Communication

Emergency Equipment Available (see site plan for locations)

- .2 each Spill containment kits (55-gallon drums) with absorbent and booms
- .4 each Fire extinguishers located throughout the office and facility
- .2 each Eyewash stations and shower facilities
- .1 Shop vacuum for small spill cleanups
- .3 each 85-gallon overpack drums
- .At least one case each of Tyvek suits, gloves, and safety glasses

Water to fight fires is available from a hydrant system. The pressure supplied is maintained at approximately 65-70 psig by the County. Volume available is in excess of 1000 gallons per minute. Total system capacity is not available.

Training

Training is the responsibility of the Department Manager (DM). The DM will ensure that personnel receive training commensurate with their designated duties and responsibilities. Standard Operating Procedures (SOP) and regulatory requirements will be the basis for training and will vary depending on the job description of the employee.

.Operations Personnel

- o Emergency Response Procedures
- o PPE use
- o Containment procedures
- o Record keeping and reporting policies
- o Operating & Inspection procedures
- o Loading and unloading procedures
- o Check-in and processing procedures

Spill Abatement Activities

.Incidental Spill - The spill from any tank pump or leaking pipe or hose will be contained by the existing containment and controlled without causing any damage to the environment.

.Major Spill - The spill from the containment in the plant area will flow in a direction away from the plant, in the back toward the retention basin or in the front towards a drainage ditch. In such a case, immediate action will be taken to reinforce weaker or damaged parts of the containment areas and to minimize further release. Remediation and clean-up will begin as soon as feasible.

The Plant Manager and/or the PIC are responsible to order necessary steps for implementation of these instructions using the following guidelines:

- .Do not risk human life or health in an attempt to control a spill
- .Shut off pumps and close all lines serving a leaking container or tank

- .Shut off electricity to the affected area, if necessary
- .Mobilize emergency response personnel

- o Normal working hours –the plan will be activated by use of the public address system
- o Off-shift hours –cpntrol team personnel will be notified by telephone or pager

- .Activate the alarm system if necessary
- .Contain the spill as close to its source as possible
- .Assemble required clean-up equipment and order clean-up
- .In addition to the PIC, operating personnel will, under the direction of the PIC, position the absorbent materials in strategic points to contain the spill as needed.
- .Response team members will operate pumps and man hoses to further contain and capture the spill
- .Team members will perform other assigned tasks needed as directed by the PIC

4.0 EMERGENCY COORDINATOR (PIC) INFORMATION

Duties of the Emergency Coordinator or Designee

- Respond to any emergencies that may arise. Use established response protocols and personal prospective equipment as needed. Summon aid as necessary. Evacuate as required.
- In case of FIRE, summon the Fire Department and the Police immediately by activating the alarm system and by dialing 911. If there are injuries EMS can also be contacted by dialing 911.
- In the event of a spill, release or discharge, contain the flow of hazardous waste to the extent possible. Spills to the city sewer must be reported to the Utility Department. Spills must also be reported to the State Warning Point (850) 320-0519 or (800) 413-9911, and/or the National Response Center (800) 424-8802 if above the reportable quantity. Check SARA Title III.
- Clean up the waste and any contaminated materials or soil as soon as it is practical.
- If the incident i.e. fire, explosion, or other release, could threaten human health outside the facility or HOWCO has knowledge that a spill has reached surface water, notify the National Response Center Immediately at (800) 424-8802.

The following identifies the primary and alternate emergency coordinators:

Recycling Facility Primary Emergency Coordinator (Primary PIC)

Daniel Christensen

Office Telephone Number 352-687-4729

Cell Phone 352-598-2230

If the Primary PIC is unavailable, contact the Secondary PIC.

Recycling Facility Secondary Emergency Coordinator (Secondary PIC)

Tim Hagan

Office Telephone Number 727-327-8467

At all times, there will be at least one PIC either at the facility or on call who is available to respond to an emergency by reaching the facility within a short period of time and has the responsibility for coordinating all emergency response measures. The PIC will be familiar with all aspects of this plan, all operations and activities of the facility, the location and characteristics of the waste handled, the location of all records within the facility, and the general facility layout. Additionally, all PICs have the authority to commit resources needed to carry out this plan.

5.0 ARRANGEMENTS WITH LOCAL AUTHORITIES

Arrangements with authorities are established by providing appropriate agencies with a copy of the plan and a letter requesting their assistance in the event of an emergency. In the event revisions to this plan are made, a revised copy will be submitted to the referenced agencies. In the event any unplanned, sudden or non-sudden release of oil to the environment, the provisions of this plan must be carried out by the PIC. The PIC will determine if the emergency requires assistance from Federal, State or Local agencies. If agency assistance is needed, the PIC or Designee shall notify the agency with the following information:

1. Time and type of emergency
2. Location
3. Name and quantity of material(s) involvement
4. Type of service needed
5. The possible hazards to human health or the environment

The following items will be completed by the PIC:

1. Provide a site layout, description of oil properties and associated hazards (MSDS), and appropriate emergency and evacuation plans
2. Consult with emergency response teams to determine if agreements between the primary and supporting personnel are necessary
3. Document all agreements/refusals

The following agencies are requested to provide assistance as described below:

Astor Volunteer Fire Department

- .Provide fire fighting and spill response capability for any fire, release and explosion
- .Provide rescue and emergency medical assistance for employees, if necessary

Lake County Police Department

- Provide traffic and crowd control outside the facility, and assure free access for fire equipment, ambulances, and emergency response vehicles
- Assist in the evacuation of the surrounding areas if the emergency situation warrants

Lake County Emergency Management

- Provide large-scale emergency response management/coordination for incidents that require multiple agency response

Florida Hospital (Waterman)

Supply medical services and treatment for individuals suffering injuries or illnesses as a result of the emergency incident

6.0 EMERGENCY PROCEDURES

6.1 Identifying Releases and Hazards

Whenever there is a release, fire, or explosion, if the fire alarm has not automatically activated, the PIC will immediately activate the fire alarm and dial 911. The PIC will then attempt identify the character, exact source, amount, and a real extent of any released material/waste. The PIC will do this by observation or review of facility records/manifests and, if necessary by chemical analyses.

Concurrently, the PIC will assess possible hazards to human health and the environment that may result from a release, fire, or explosion. The assessment will consider both direct and indirect effects of a release, fire, or explosion such as possible toxic gases, or the effect of any hazardous surface water runoff from water or fire depressing agents used to control the situation.

6.2 Notifications and Reporting

Whenever there is an imminent or actual emergency, if the fire alarm has not activated automatically, the PIC or his/her designee will immediately activate the facility communication system and dial 911 immediately, if necessary. The facility communication system includes a telephone, cellular phones, two-way communications, and horn signals. 40 CFR Table 302.3 will be consulted when any hazardous materials are spilled. If the hazard material that was released meets or exceeds the Reportable Quantity (RQ), the agencies below will be notified immediately:

- 1) Florida Department of Environmental Protection via (407) 894-7555 (within 24 hours)
- 2) State Warning Point via (800) 413-9911 or (850) 320-0519 (within 24 Hours)

Notification of additional local authorities listed in Appendix B may be conducted, as deemed necessary by the PIC.

If the PIC determines that the facility has had a release, fire; or explosion, which could threaten human health or the environment outside the facility boundaries, he/she will report the findings as follows:

- 1) If the PIC's assessment indicates that evacuation of the local area may be advisable, he/she will immediately notify the local authorities identified above. Additional assistance from local authorities listed in Appendix B may be obtained, as deemed necessary by the PIC. The PIC will be available to assist local authorities in deciding whether evacuation of the immediate area is needed.

2) The PIC will report the following information:

- a) Name and telephone number;
- b) Name and address of facility;
- c) Time and type of incident;
- d) Name and quantity of material involved, to the extent known;
- e) The possible hazards to human health and the environment, outside the facility boundaries.

6.3 Emergency Procedures

During an emergency, the PIC will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, reoccur, or spread to other hazardous material/waste at the facility. These measures may include stopping operation, collecting and containing released material/waste, and removing or isolating containers. If the facility stops operating, the PIC will monitor for leaks, pressure build-up, or breaches in valves, pipes, containment, etc.

After an emergency, the PIC will provide for treatment, storage and disposal of recovered material/waste including contaminated soil, water, or other material. The treatment, storage, disposal of recoverable material/waste will be conducted in accordance with applicable county, state, and federal regulations. Waste management companies utilized in the treatment, storage, and disposal of recovered material/waste will be chosen at the PIC's discretion. The PIC will ensure that, in the affected area(s) of the facility, no material/waste is incompatible with the released material/waste until cleanup procedures are completed. All emergency equipment listed in this plan (Appendix B) will be cleaned, if necessary, and fit for its intended use before operations are resumed.

Emergency Communication System

There are several telephones located within the office and laboratory areas. Pagers and cellular phones are issued to the PIC and operating personnel. Visual and voice warnings will be used to notify on-site personnel of an emergency during working hours. During non-working hours, telephones and pagers are used to contact the PIC and members of the Emergency Response Team. There is an emergency telephone located within the tank farm.

Fire Control Systems

- .Dry chemical fire extinguishers in the tank farm area, one on each corner
- .Dry chemical fire extinguishers in the garage area
- .Dry chemical fire extinguishers in the laboratory area
- .Dry chemical fire extinguisher in the main office area

Site Control Systems

- All oil storage areas are surrounded with containment systems
- Oil containment and cleanup materials include:
 - o Oildry
 - o Dike plugs
 - o Booms and absorbent pads
 - o Aggregate material for containment

- Decontamination equipment includes:

- o Surfactant and water
- o Brushes, buckets and mops

Maintenance and Testing

1. Site and fire control equipment will be inspected monthly
2. An outside vendor will test fire extinguishers annually.

Equipment Handling Procedures

1. All containers and equipment will be stored such that sufficient aisle spacing is maintained to facilitate emergency response equipment
2. All oil management and transfer operations will be complete in areas where there is access to communication devices.

Removal of Oil/Water from Containment

To remove oil or water from the containment, the following steps will be followed:

1. Accumulated water is inspected for the presence of a sheen or petroleum odor.
2. If a sheen or odor are present, the water is considered to be contaminated and will be transferred into a used oil storage tank.
3. The water is not considered contaminated; it may be disposed of by normal methods.
4. The following records must be maintained for each discharge event:
 - a. Date
 - b. Time
 - c. Estimated quantity of accumulation
 - d. Presence or absence of petroleum or sheen
 - e. Person removing the accumulation

Off-site Emergency Response Procedures .during transport

1. Driver assesses the situation
2. Driver will contact the PIC using the telephone numbers provided in this plan
3. If the emergency warrants an immediate response by outside agencies, the driver will contact the appropriate agency using the telephone numbers provided in this plan.
4. Driver will set up absorbent material in front of any sewer drains and/or grassy areas to prevent oil from spreading to those areas
5. Driver will remedy the release utilizing the spill containment procedures defined in this plan.
6. Driver will document the incident as noted in this plan.

7.0 DECONTAMINATION

All equipment used in the emergency response action will be decontaminated with an appropriate compatible cleaning solution before the articles leave the work area. Oil contaminated equipment

should be cleaned using a surfactant and water solution. Always refer to the manufacturers equipment guide for further details.

The PIC is responsible to assure the effected are clean and the above-mentioned decontamination procedures are performed. Damaged tanks, pipes, drums, etc. will be repaired or replaced with equivalent equipment that meet or exceed the original design specifications, when applicable.

8.0 REPORTING

If this plan has been enacted, the PIC will submit a written report to the applicable Federal, State and Local agencies within 15 days of the incident. The report shall contain the following information:

1. Name, address, and telephone number of the owner/operator
2. Name, address, and telephone number of the facility
3. Date, time and type of incident
4. Name and quantity of material(s) involved
5. The extent of injuries, if any
6. An assessment of actual or potential harem to human health or the environment
7. Estimated quantity and disposition of the recovered material from the incident

9.0 TANK CLOSURE PLAN

Aboveground storage tanks (ASTs) will be closed in accordance with AST System Closure Requirements in Chapter 62-761.800, F.A.C.

10.0 AMENDMENTS to CONTINGENCY PLAN

This plan will be revised, if necessary, whenever:

1. Applicable regulations or ordinances are revised;
2. The plan fails in an emergency;
3. The facility changes in a manner that materially increases the potential for fires, explosions, or the release of hazardous materials/waste, or changes the response necessary in an emergency;
4. The PICs change; or
5. The list of emergency equipment changes.

PHONE NUMBERS OF LOCAL AUTHORITIES AND AGENCIES

<u>Local Authority/Agency</u>	<u>Phone Number</u>	<u>Contact Period</u>
Lake County Sheriff's Dept. (352) 343-2101	911	Immediately
Astor Volunteer Fire Department (352) 759-24437	911	Immediately
Emergency Medical Services	911	As needed
FDEP 24 hours	(407) 894-7555	As needed
National Response Center	(800) 424-8802	As needed
State Warning Point	(800) 413-9911	Immediately
Poison Control Center	(800) 282-3171	As needed
EPA Region IV	(404) 562-8700	24 hours
Florida Hospital (Waterman)	(352) 589-3333	As needed
Memorial Hospital (W Volusia)	(352) 734-3320	As needed
ChemTrec	(800) 424-9300	As needed