

## PINELLAS PLANT CONTINGENCY PLAN FOR THE HAZARDOUS WASTE MANAGEMENT FACILITY

Environmental Health and Safety Programs

April 1988

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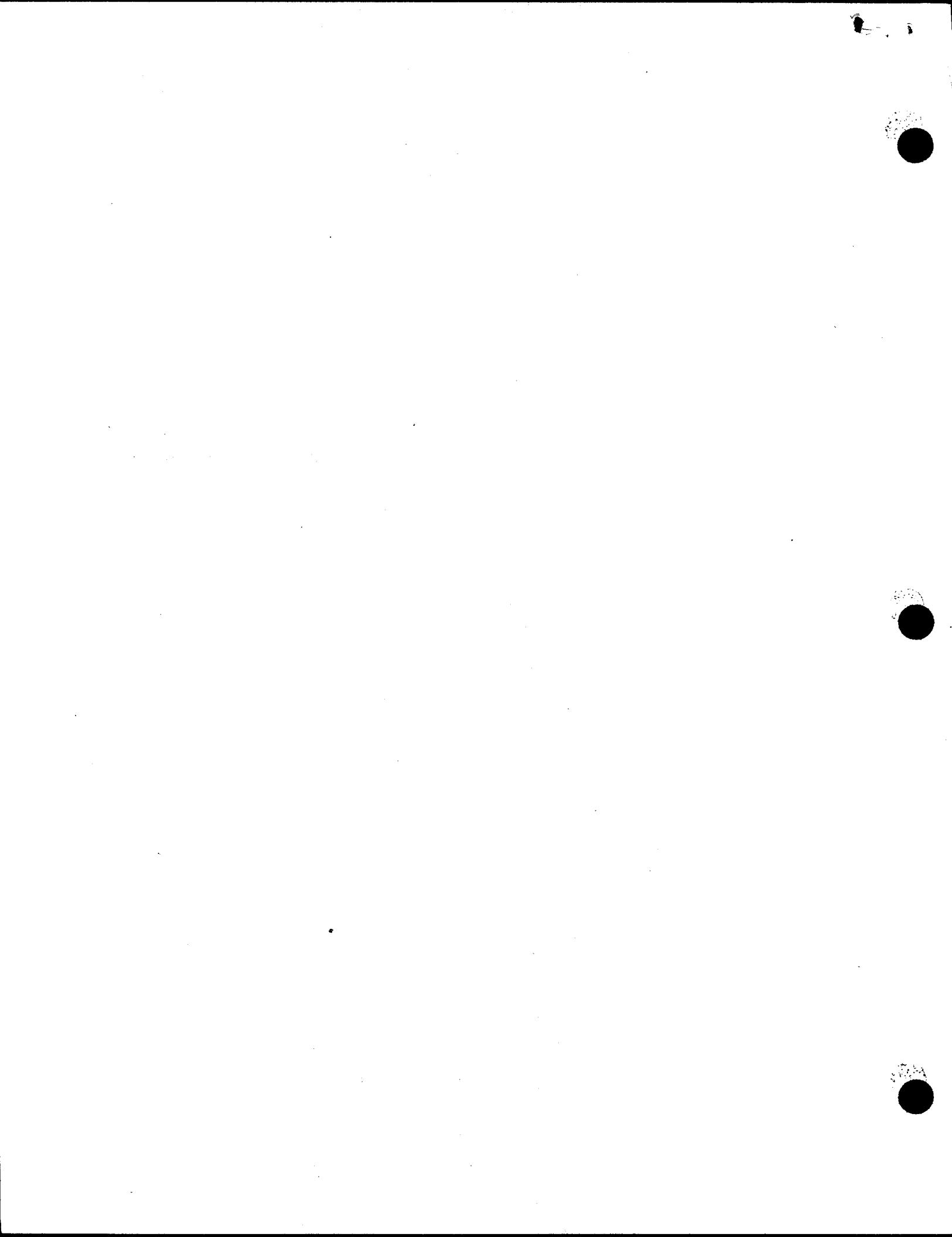
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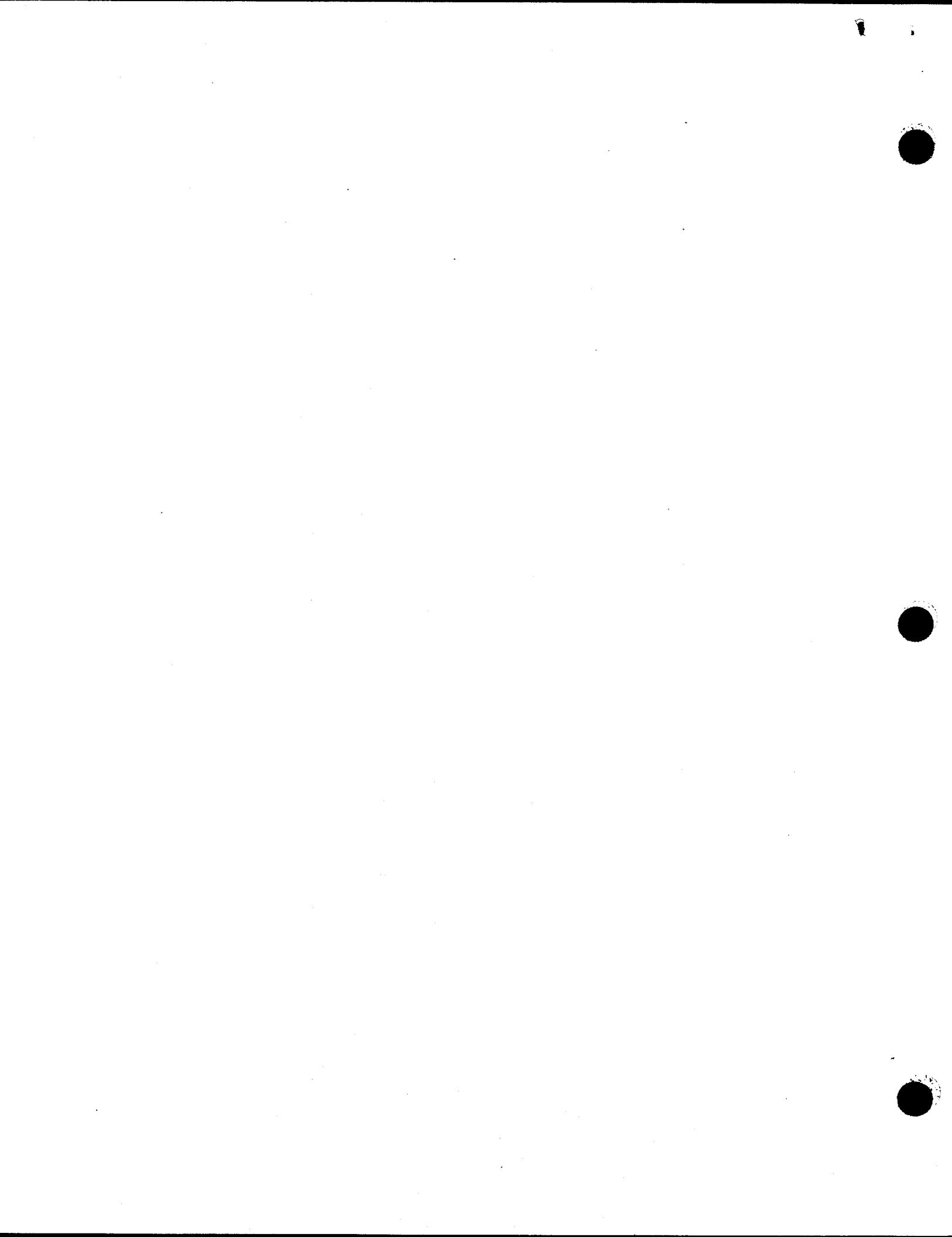


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## A. CONTINGENCY PLAN

### 1.0 INTRODUCTION

Subpart D of Part 264 (264.50 through .56) of the Resource Conservation and Recovery Act (RCRA) regulations require that each facility maintain a contingency plan detailing procedures to "minimize hazards to human health or the environment from 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 PURPOSE AND SCOPE

This contingency plan provides an explicit description of response procedures to be implemented during an emergency situation in order to protect human health and the environment. Various structural and operational measures are in place, which should effectively minimize the possibility of an emergency situation occurring. The following sections present the procedures for implementation of the plan, containment and control of the released materials, evacuation of the facility, reporting of the incident, and other relevant information.

### 3.0 FACILITY OVERVIEW

The United States Department of Energy (DOE) Pinellas Plant, located approximately 1.5 miles northwest of Pinellas Park, Florida, generates, treats, and stores solid and liquid hazardous wastes. The plant is owned by DOE and operated by General Electric (GE). Figure 1 shows the site location, and Figure 2 shows the general facility layout.

Copies of this contingency plan are kept in-plant with the Plant Emergency Coordinators, the Security Patrol, and DOE/Pinellas Area Office (PAO). Copies of this contingency plan have been submitted to the Pinellas County Sheriff's Department, the Seminole Fire Department, the Pinellas Park Fire Department, the Pinellas County Emergency Medical Service, GSX Services, Inc., Enviropact, Inc., and Pinellas County Emergency Management Administration.

Explicit details of the facility's operations, preparedness procedures, and waste handled are presented in Section G of this Contingency Plan.

Table 1 lists the types of hazardous waste that are anticipated to be handled in each area of the site.

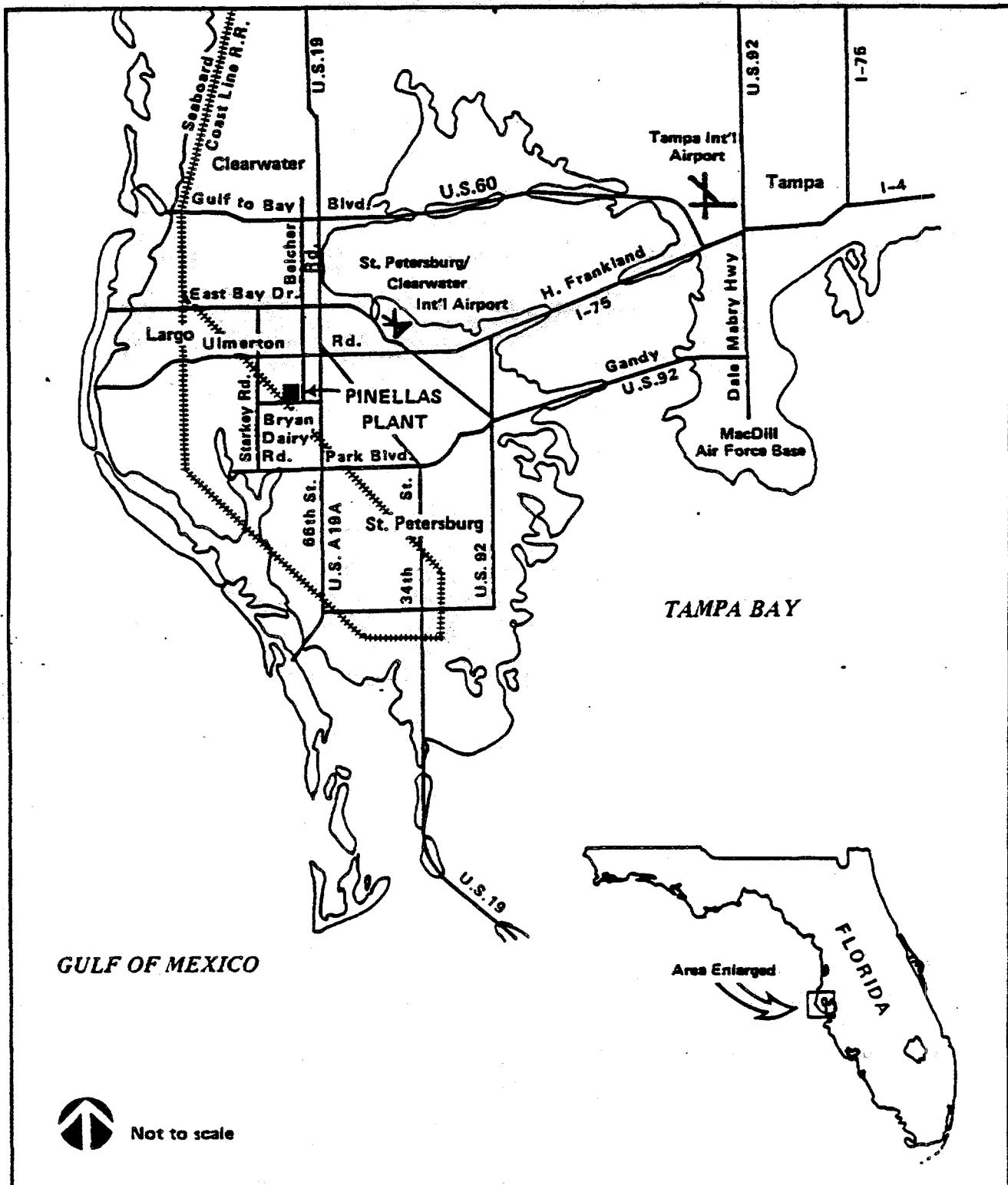


Figure 1. General Site Location Map

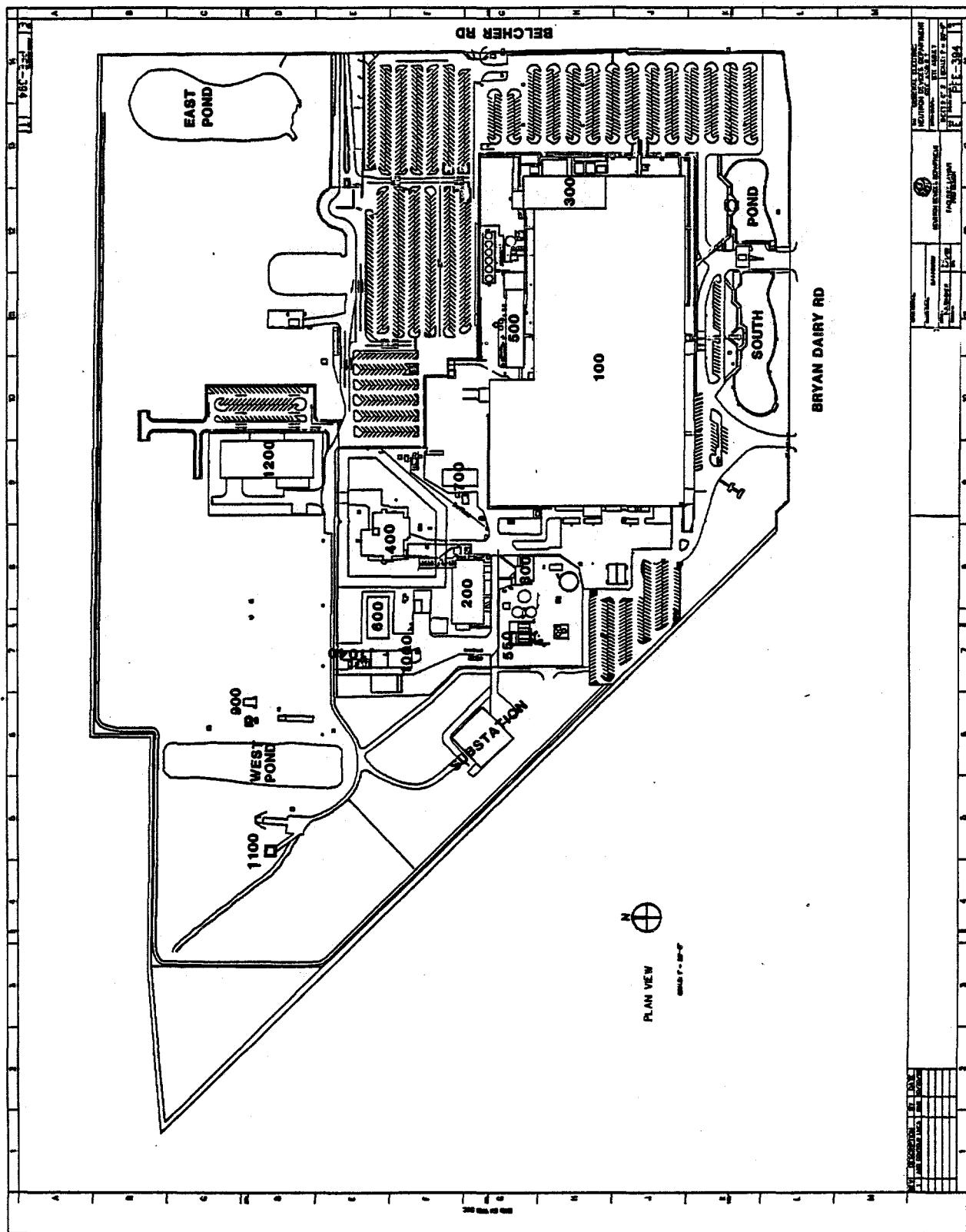


Figure 2. Facility Layout and Design

Table 1. Types of Hazardous Waste

Location*	Form/Container	Material Type	Hazard Rating**
Container Storage Facility (Building 1040)	Solid, Liquid/Drums, Lab Packs	Methylene Chloride With Epoxy Resins Arsenic Wastes Cyanide Wastes Lithium Silicon Calcium/Calcium Chromate Miscellaneous Chemicals Electroless Copper Solution Iridite Resins Iron Disulfide Metal Cutting Fluids Red Phosphorus Titanium Hydride Titanium Metal Powder Nitro Cellulose Paints	T T R, T R R, T I, T C C R R T I I I R I
Container Storage Facility (Building 1000)	Solid/Drums	EP toxic lead solids mixed with Radioactive Material	T
Tank Storage Facility (immediately west of Building 1040)	Liquid/Tanks	Methylene Chloride 1,1,1-Trichloroethane Trichloroethylene Freon Acetone Toluene Alcohols Amyl Acetate Waste Ignitable Liquids	T T T T I I, T I I
Industrial Wastewater Sludge Storage Facility (south of Building 550)	Liquid/Tank	Sludge	T
Reactive Metals Treatment Facility (north of Building 700)	Solid/Drums	Calcium Metal and Bimetals Lithium Contaminated Materials	R R
Thermal Treatment Facility (north of Building 700)	Solid/Drums	Heat Paper, Heat Powder Detonators	R R
Industrial Wastewater Neutralization Facility (east of Building 550)	Liquid/Tank	Wastewater	***

\*Reference Figure 2

\*\*R-Reactive, T-Toxic, I-Ignitable, C-Corrosive

\*\*\*Potentially corrosive if facility does not operate properly

## B. NOTIFICATION ACTION SUMMARY

In case of an imminent or actual emergency situation, the person first observing the incident will:

- Phone Security (2191) and report your name, location, and nature and extent of the incident. Security will immediately notify the designated emergency coordinator.

<u>Name</u>	<u>Plant Phone No.</u>	<u>Home Phone No.</u>
J. R. Majestic	545-6034	397-4194
C. K. Hall	541-8273	392-3054
D. L. Cusick	541-8270	531-2994

The emergency coordinator will:

- Where applicable, see that operations are stopped and released waste is contained and collected in order to ensure that fire, explosions, and releases do not occur, recur or spread.
- See that any material which is potentially incompatible with the released material from the incident area is removed or protected until cleanup procedures are completed.
- Notify DOE/PAO that the United States Environmental Protection Agency (EPA) Region IV and the National Response Center must be notified within 24 hours of a release if the material is:
  - a Comprehensive Environmental Response Compensation and Liability Act (CERCLA) hazardous substance, as defined in 40 Code of Federal Regulations (CFR) 302, Table 302.4
  - an extremely hazardous substance, as defined in 40 CFR 355, Appendix A and B.
  - released in a quantity equal to or greater than the reportable quantity (RQ) established in 40 CFR 355 or 40 CFR 302, Table 302.4
  - released in quantity equal to or greater than the RQ and is likely to migrate beyond the physical boundaries of the facility. In this case also notify DOE/PAO that the State Emergency Response Commission and the Local Emergency Planning Committee must be notified as required in 40 CFR 355.40.

If a hazard to human health or the environment is possible, the emergency coordinator will:

- Initiate containment and control procedures, as described in Section E of this plan.

- Provide response authorities (Section C) with a preliminary assessment of the situation and request appropriate assistance.
- If potential casualties are involved, coordinate first aid activities.
- If evacuation is required, activate the Evacuation Plan described in Section N. of this plan.

### C. RESPONSE AUTHORITIES

<u>Incident</u>	<u>Contact</u>	<u>Phone No.</u>
Fire/Explosion	GE Fire Brigade Seminole Fire Department	2191 441-4884 or 911
Hazardous Material Spill or Release	GE Fire Brigade Pinellas County HazMat Team	2191 911
Spill reaches navigable water, or the release to the environment is a RQ as established in 40 CFR Parts 117 and 302	U.S. EPA Region IV Response Center National Response Center  Notify PAO that notification within 24 hours to above is required if reportable quantity is exceeded.	404/347-4062 800/424-8802  or  202/426-2675
Spill involves an extremely hazardous substance (HS) under Superfund Amendments & Reauthorization Acts (SARA) (40 CFR 355, Appendix A/B) or HS under CERCLA, and exceeds the RQ for the chemical, and the release has the potential to migrate beyond property boundaries	Notify DOE/PAO that the State Emergency Response Commission and Local Emergency Planning Committee must be notified in accordance with 40 CFR 355	904/488-1320* 441-4884** or 911**
Injury	Plant Medical Center Pinellas County Emergency Medical Service Poison Control Center	2191 441-4884 or 911 800/282-3171

\*State Emergency Response Commission

\*\*In the event of a spill which involves reporting requirements under 40 CFR 355.40, the requirement to contact the Local Emergency Planning Committee is met by reporting incident to the emergency number.

Incident	Contact	Phone No.
Activation of Contingency Plan	Florida Department of Community Affairs - Emergency Management Bureau Florida Department of Environmental Regulation	904/488-1990 or 904/488-1320 623-5561 (Tampa)
Plant Evacuation	Pinellas County Sheriff Florida State Highway Patrol	587-6200 893-2711
Emergency Response Contractors	GSX Services, Inc. Enviropact (Clearwater)	573-1405 (24 hrs) 573-9663
Prohibitive Discharge to the Pinellas County Sewer System	Industrial Program Manager Director-Sewer System Sewer Treatment Plant	462-4101 586-8969* 462-4721 892-7953

Give the following information to all notified agencies and authorities:

- Your name and telephone number
- Name and address of the facility
- Time and type of incident (e.g., release, fire)
- Name and quantity of material(s) involved, to the extent known
- The extent of injuries, if any
- Possible hazards to human health or the environment, outside the facility.

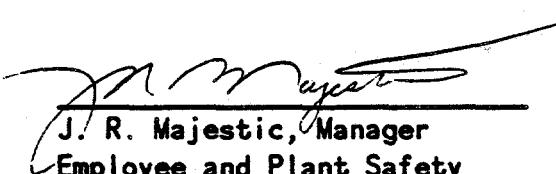
If additional information is needed regarding the emergency situation call:

- CHEMREC 800/424-9300
- National Poison Control Center 404/589-4400

\*Beeper-Using a touch tone phone, dial the phone number 586-8969, wait for two sets of two beeps each. Then dial the phone number that the Sewer System personnel can call back on.

#### D. CERTIFICATION

This certifies that this Hazardous Waste Contingency Plan has been reviewed by the Plant Services Section Manager and the Environmental Health and Safety Program Manager. This plan has the full approval of management at the level of authority to commit the necessary resources, manpower, equipment, and materials to implement the plan to expeditiously control any incident, whether fire, explosion, spill, or other release of hazardous waste, to thoroughly remedy the effects of any such incident, and to fully return all hazardous waste management operations to a proper operating condition before treatment or storage is resumed.



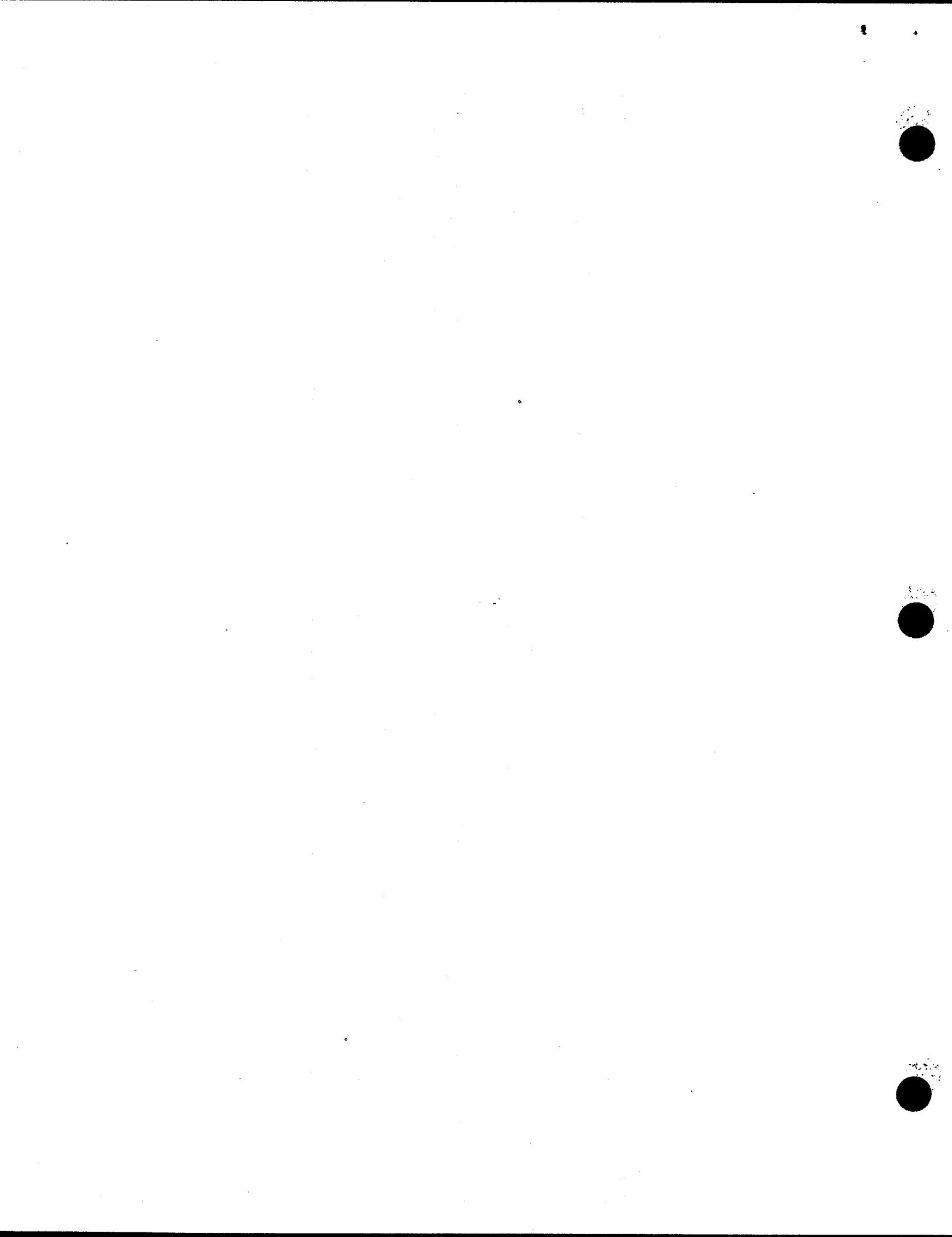
J. R. Majestic, Manager  
Employee and Plant Safety

10/28/88  
Date



J. S. Caven, Manager  
Plant Services

10-28-88  
Date



## E. IMPLEMENTATION OF EMERGENCY RESPONSE PROCEDURES

### 1.0 ON-SITE RESPONSE

In case of an imminent or actual emergency situation, the person first observing the incident will initiate the response activities described in Section C. This will be done as follows:

- During normal working hours, the plan will be activated using the plant's emergency telephone system and dialing 2191. The plant communications guard will notify the emergency coordinator.
- During off-shift hours, Security Operations will notify the emergency coordinator by phone.

A list of emergency coordinators, with telephone numbers, is found in Section B of this plan. Coordinators are also listed along with other emergency contacts, in Appendix A.

The emergency coordinator will take control of the affected area and commit resources necessary until cleanup of the incident is completed. The emergency coordinator will do the following:

- Where applicable, see that processes and/or operations are stopped, and released waste is contained and collected in order to ensure that fires, explosions, and releases do not occur, recur, or spread.
- See that any material which is potentially incompatible with the released material from the incident area is removed or protected until cleanup procedures are completed.
- Determine the exact source, amount, and extent of the released materials (by observation and/or immediate review of available data), and assess the possible direct and secondary hazards to human health and the environment. (Evaluation criteria are presented in Table 2.)

**Table 2. Evaluation Criteria For Implementation of Contingency Plan (Possible direct and secondary hazards to human health and the environment)**

<u>Fire and/or Explosion</u>	<u>Spills or Material Release</u>
A fire causes the release of toxic fumes.	The spill could result in release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
The fire spreads and could possibly ignite materials at other locations on-site or could cause heat-induced explosions.	The spill could cause the release of toxic liquids or fumes.
The fire could possibly spread to off-site areas.	The spill can be contained on-site, but the potential exists for ground water contamination.
Use of water or water and chemical fire suppressant could result in contaminated runoff.	The spill can not be contained on-site, resulting in off-site soil contamination and/or ground or surface water contamination.
An imminent danger exists that an explosion could:	The spill endangers human health or the environment for any other reason.
<ul style="list-style-type: none"> <li>• cause a safety hazard because of flying fragments or shock waves</li> <li>• could ignite other material at the facility</li> <li>• Could result in release of toxic material</li> </ul>	The spill results in the release of a "reportable quantity" of a hazardous substance under CERCLA.
An explosion has occurred.	The spill results in the release of a RQ of an extremely hazardous substance under SARA or CERCLA, and potential exists for the release to migrate beyond the property boundaries of the facility. Under SARA, report of the release is not required if it results in exposure only to persons within the site(s) where the facility is located. (Note: Notification must be made to proper authorities as defined in 40CFR366).
A fire endangers human health for any other reason.	

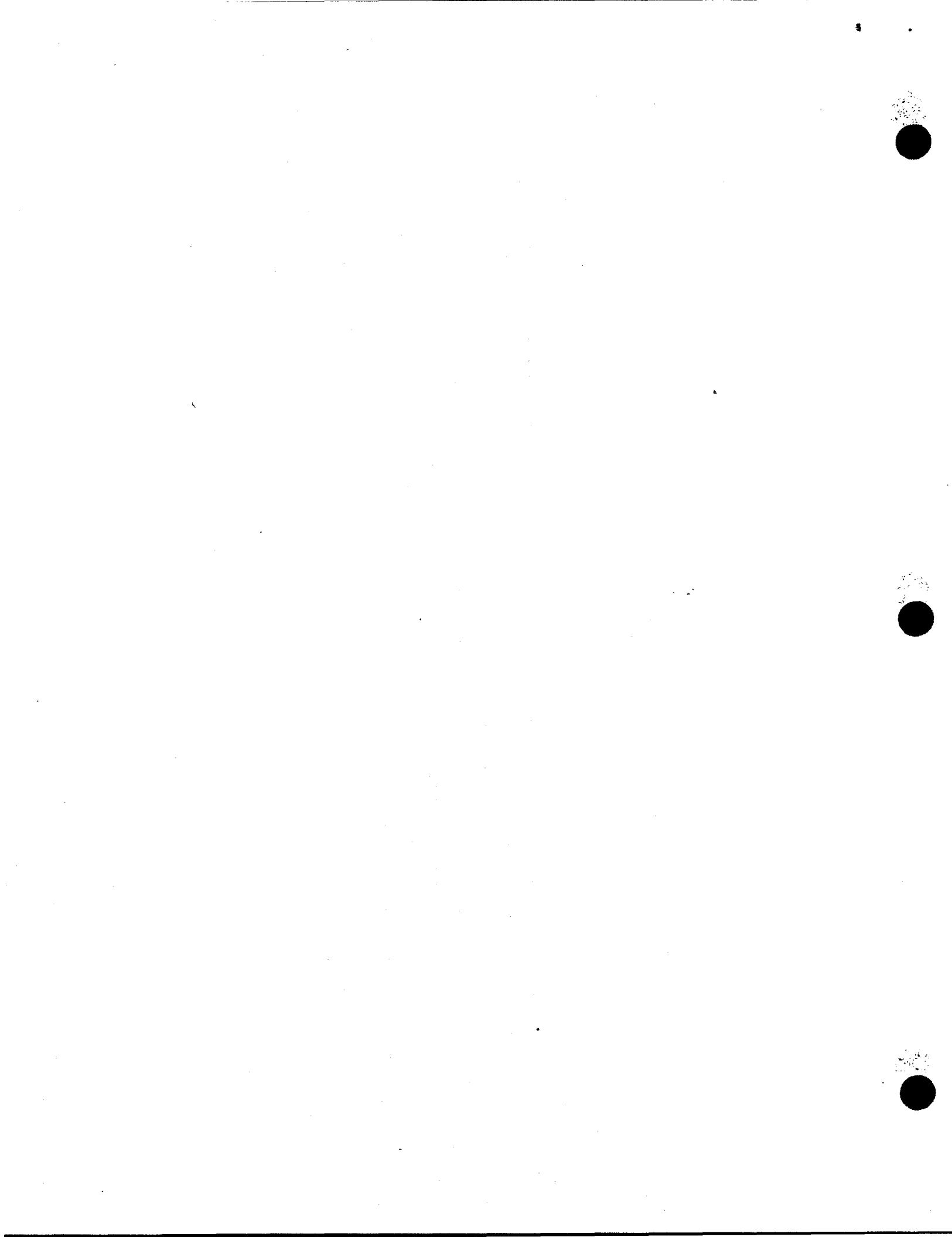
**Note:** Notification of proper authorities must be made within 24 hours of a discharge of any hazardous substance into the environment in amounts equal to or greater than reportable quantities as listed in 40CFR302 Table 302.4. Emergency coordinator must notify the Pinellas Area Office of the Department of Energy that notification is required.

## 2.0 CONTINGENCY PLAN

When an incident has the potential to affect human health or the environment, the following steps will be undertaken by the emergency coordinator:

- Initiate control procedures, as described in Section C.
- Provide local authorities with a preliminary assessment of the situation and request appropriate assistance, if necessary.
- If potential casualties are involved, coordinate first aid activities.
- If evacuation is required, activate the Evacuation Plan described in Section N.
- Notify the government official or on-scene coordinator designated for this facility (David S. Ingle, DOE Safety and Occupational Health Manager, 854-1081) that the National Response Center (800/424-8802) must be called.
- Notify the applicable emergency response contacts and state/local authorities listed in Section C, Response Authorities.
- If operations are stopped, monitor for leaks, pressure buildup, gas generation, ruptures in tanks, valves or pipes, or other potentially hazardous situations.

The emergency coordinator will continue to retain control of all emergency activities on the site and will coordinate these efforts with off-site response activities.



## F. MATERIAL IDENTIFICATION

### 1.0 HAZARDOUS MATERIALS

#### 1.1 Character of Release

The first indicator of the character of drummed waste is the diamond-shaped chemical label which appears on each drum (Appendix B). The codes shown on the labels give information on the extent to which the waste is ignitable, a health hazard, acidic or basic, reactive, or an oxidizer. In addition, waste is stored in groups by similarity and compatibility to minimize potential effects of spillage and leakage. This grouping will help to identify releases should they occur.

There are three active hazardous waste storage tanks, and each is clearly marked. Releases from any of these will be easily characterized.

Miscellaneous waste laboratory chemicals are labeled with the diamond-shaped hazard labels mention above. The chemicals are brought to the container storage facility and packed in drums of absorbent "lab packs". The packing of lab packs is based upon compatibility and the type of hazard they pose. Major releases from these small amounts of chemicals are extremely unlikely.

The sludge holding tank is a reinforced concrete tank used to store sludge removed from industrial wastewater lift stations, the elementary neutralization facility tanks, or the cooling tower basin. A hazardous release from this tank is extremely unlikely, since the sludge is inert, nonignitable, and immobile. The character of this sludge is well defined.

The thermal treatment facility is used to treat waste heat paper, heat powder, and detonators. Because small quantities of solid waste are treated within contained reaction vessels, any release of hazardous waste from this facility is very unlikely. A more significant hazard associated with this operation is uncontrolled heat or fire.

The elementary neutralization facility consists of an equalization tank, two neutralization tanks for pH adjustment, and two in-ground holding tanks. The only waste which could be released from this facility would be potentially corrosive industrial wastewater. Because of the nature of the Pinellas Plant operations the sludge that accumulates in the equalization, neutralization, and holding tanks, is characterized as EPA Hazardous Waste (HW) Resource Conservation and Recovery Act (RCRA) code F006.

Waste in the reactive metal treatment area is all of the same type--metals (such as lithium and calcium)--which oxidize readily on contact with water. The character of these wastes is well defined.

### 1.2 Hazard Assessment

The only areas posing any significant threat to human health or the environment are: the ignitable waste tank, the waste halogenated solvent tank, and the container storage facility. Some minor local hazard exists in the reactive metals treatment area and the thermal treatment area, but can be dealt with easily by the GE Fire Brigade, which is always present during thermal treatment operations and the initial phase of the reactive metal treatment.

In the event of a fire or explosion at the tank farm or in the container storage building, irritating and/or extremely toxic gases may be released. Emergency response teams will have pure breathing air available. In the case of severe fire or explosion, evacuation of downwind personnel and/or inhabitants may be required. Other releases from the tanks or container storage building are not likely to require off-site action due to the secure secondary containment provided by the concrete dike around the tanks' bases and the drainage collection system of the container facility.

The procedures for determining the need for evacuation are presented in Section N. The proper notification of authorities is presented in Section B.

## G. CONTROL PROCEDURES

### 1.0 GENERAL PROCEDURES

The site design and operating procedures are designed to contain released materials, minimize the potential hazards to facility personnel, and prevent movement of released materials off-site. Secondary containment is adequate and makes releases of hazardous waste extremely unlikely.

All storm water runoff from hazardous-waste management areas drain either to the East Pond or the West Pond, (Figure 2). Any conceivable spill to the surface water drainage system can be contained by these ponds.

#### 1.1 Container Storage Areas-Buildings 1040 and 1000

The container storage facility in Building 1040 is situated on a concrete foundation, and the floor of each storage bay slopes to its own collection drain and sump. These sumps are closed collection systems which must be pumped out to empty. The foundation is raised with respect to its surroundings to control runoff. Incompatible waste is stored in separate areas. Piping, wiring, and control stations are raised above the concrete floor. Lights are explosion proof, and pumps are air powered to minimize spark and fire hazards. No smoking is permitted within the facility.

The mixed waste container storage facility in Building 1000 is situated on a concrete foundation approximately three inches above the surrounding surface grade. The elevation is sufficient to prevent any run-in of storm water. In addition, the roll-up door is fitted with a bottom seal to prevent wind from driving water under the door. Incompatible materials or liquids will not be stored in the mixed waste storage room therefore containment for spilled liquids is not necessary. In the unlikely event fire suppression sprinklers were to be activated the water would drain to either the East or West Pond (Figure 2) where any conceivable contaminated water can be contained.

#### 1.2 Tank Storage Area (immediately west of Building 1040)

The tank storage area contains ignitable liquids and waste halogenated solvents, machine shop cutting fluids, and waste lubricating oils. These tanks have flame arrestors on each vent line, and are located on pads with concrete dikes to contain spills and prevent runoff.

### 1.3 Reactive Metals Treatment Facility (north of Building 700)

The reactive metals treatment facility is a concrete pool with sides raised above grade. It contains no waste except during an actual treatment batch run. No smoking is permitted in the facility area due to the possible generation of hydrogen gas. The plant fire tanker truck is always present during the initial phase of reactive metals treatment.

### 1.4 Sludge Holding Tank (south of Building 550)

The reinforced concrete sludge holding tank is used to hold sludge collected from the industrial wastewater lift stations, the elementary neutralization facility tanks, and the cooling tower basin on an annual basis. It is leak-tested annually.

### 1.5 Thermal Treatment Facility (north of Building 700)

The thermal treatment facility is used to treat waste heat paper, heat powder, and detonators. Heat paper and heat powder are treated in a shallow steel burn pan, approximately 6 feet long, 2 feet wide, and 6 inches deep. The detonators are treated in a metal reaction vessel. The reaction vessel and burn pan are located on a concrete pad which has a berm along the sides to contain any water. During thermal treatment operations, the plant's fire tanker truck is present.

### 1.6 Neutralization Facility (east of Building 550)

The elementary Neutralization Facility consists of five tanks: one equalization tank (76,000-gallons), two neutralization tanks (36,000-gallons each) and two in ground holding tanks (32,000-gallons each).

Adjustment of pH occurs between the equalization tank and the first neutralization tank and between the first and second neutralization tanks. The pH is monitored throughout the system. Improperly adjusted wastewater is returned to the head of the plant.

## 2.0 RESPONSE ACTIVITIES

In the event of a spill or release, the emergency coordinator will:

- Assemble the required response equipment: protective clothing and gear, heavy equipment, absorbent material, empty drums, drum overpacks, and plugging materials.
- Determine the most appropriate containment or diking method (if required): earthen dikes, excavation, or excavation and dikes.

- Coordinate activities of supervisory personnel and maintain constant communication with them and response teams.

In the event of a fire or potential explosion, the emergency coordinator will:

- Assemble appropriate response equipment: protective clothing and gear, fire truck and fire extinguishers, water trucks and heavy equipment, diking and neutralization material, and empty drums for containment of cleanup residues.
- Determine the best method of approach and containment:
  - Move in from upwind side
  - Utilize foam extinguishers if there is potential for recurrence or flashback
  - Utilize dry chemical for large areas and in situations where flashback potential is low
  - Cool all affected containers with flooding quantities of water (where appropriate)
  - If outside of containment area, use soil for residue containment or absorbents if control by earthen dikes is not possible
  - Use on-site fire trucks for suppression of grass fire or vapor suppression in larger fires
- Coordinate activities and maintain communications with on-site supervisory personnel and response teams.

### 3.0 SPECIFIC PROCEDURES

#### 3.1 Container Storage Areas-Buildings 1040 and 1000

Response procedures within these areas are as follows:

##### 3.1.1 Fires or Explosions.

- Response personnel will be equipped with fire and chemical-resistant clothing and self-contained breathing apparatus.

- Several fire extinguishers are available to fight small fires.
- Cool adjacent exposed containers with water spray, but only if absolutely necessary.
- Maintain control of level of water in the sump when spraying containers to minimize the possibility for overflow from the contained area.

### 3.1.2 Spills or Material Release.

- Response personnel will wear chemical resistant clothing, face shield, goggles, and respirator or self contained breathing apparatus as necessary.
- Temporarily patch or plug leaking drum(s) with compatible material if possible.
- Isolate the leaking container(s).
- Overpack the leaking drum or transfer the contents to a sound drum as soon as possible.
- Contain small spills with absorbent.
- Larger spills may require the use of a vacuum truck; if spill occurs outside of containment area, dikes may be required.

## 3.2 Tank Storage Area

Response procedures are as follows:

### 3.2.1 Fire or Explosion.

- Response personnel will be equipped with fire and chemical-resistant clothing and self-contained breathing apparatus.
- Use water spray or fog provided by fire trucks to cool tanks and "knock-down" vapors; avoid using water directly on liquids.

### 3.2.2 Spills or Material Release.

- Response personnel (2 minimum) with appropriate protective clothing and self-contained breathing apparatus will close valves and turn off feed pumps.
- Build additional containment berms outside of area if spill breaks through containment dike.
- Keep liquids contained in smallest area possible; use absorbent or clean soil to cover spill pending removal.

### 3.3 Reactive Metals Treatment Facility

Spills in this area are likely to lead to reaction of the metals in air. If this should occur with calcium metal, it should be immediately doused with oil to stop the reaction, and the oil-covered metal returned to secure drum storage. Any fires resulting from rapid reaction of lithium will not be sprayed with water. Instead, the reaction will be allowed to go to completion, with the non-hazardous residues disposed of with other plant non-hazardous wastes. However, should control of fires involving lithium be required, a Lith-X extinguisher shall be used.

### 3.4 Sludge Holding Tank

The sludge holding tank is used infrequently and is leak tested annually. Releases from this area are most likely to result from leaks in the tank. Should a drop in the volume of the tank be observed, an emergency response contractor will be contacted immediately to empty the sludge tank with vacuum tanker trucks. When empty, the tank will be inspected. The sludge which is removed from the tank will be held for proper disposal.

### 3.5 Thermal Treatment Facility

Waste spills are unlikely to occur because only solids are handled at the thermal treatment facility. Because a full contingent of GE firefighters is on hand for all thermal treatment activity, a fire emergency is extremely unlikely to develop. Should a fire become uncontrolled beyond the ability of the GE firefighters, then the Seminole Fire Department will be summoned.

### 3.6 Neutralization Facility

Any release from this facility would result from one of the following.  
(An explanation of anticipated control procedures is included.)

#### 3.6.1 Leak in the 76,000-gallon Equalization Tank.

A leak in this tank could result in the discharge of out of specification range (less than pH 5.5 or greater than pH 9.5) wastewater to the grounds surrounding the equalization tank. This discharge might be acidic, basic, or neutral. The actions taken in case of such a leak would be, in order:

- Shut down all industrial wastewater lift station pumps.
- Close health physic holding tank drains if discharging.
- Shut down regeneration of all demineralizers in the deionized water system (Building 500), if operating.
- Construct containment dikes to limit spill area, if possible.
- Test spill areas with litmus paper.
- Neutralize collected spills (if required) with mild acid or base.
- If soils have been soaked with spill, excavate and neutralize the affected soil.
- Isolate the tank if necessary by operation of required valves for the neutralization facility (Figure 3).

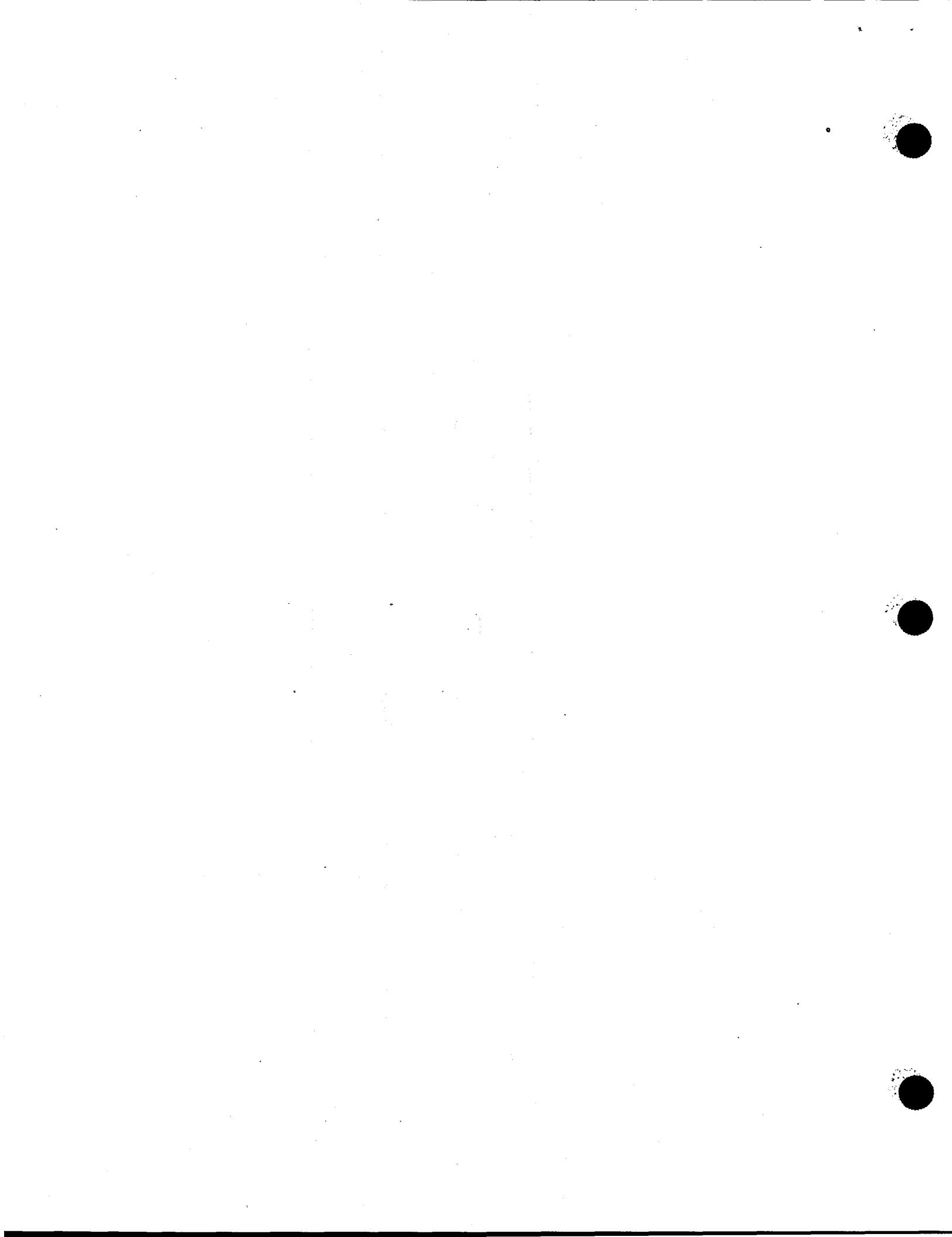
#### 3.6.2 Leak in Either of the 36,000-gallon Neutralization Tanks.

A leak in these tanks could also result in a discharge of out-of-specification water to the surrounding grounds. The same general actions would be taken as for a spill from the equalization tank.

### 3.6.3 Failure of the Neutralization Process.

Such an occurrence might lead to out-of-specification wastewater being discharged to the Public Owned Treatment Works (POTW). It is unlikely that a discharge of improperly neutralized wastewater from the Pinellas Plant would affect the treatment process of the POTW (it would be diluted many times). However, it might adversely affect the sewage piping or pumps for some distance from the plant. Actions taken in case of neutralization process failure includes, in order:

- Shut down pumps discharging industrial wastewater to the POTW.
- Shut down industrial lift stations.
- Shut down regeneration of demineralizers, if operating.
- Repair the neutralization process.
- If the out-of-specification discharge is determined to be a prohibitive discharge as published in the Pinellas County Sewer Use Ordinance (PCSUO) Section 5 (a copy of which is kept on file with the Plant's Utility Operator in Building 500), the appropriate notification procedure as outlined in Section 6 of the PCSUO will be followed. These notifications consist of an immediate telephone notification followed by a written report within five business days.
- If the process failure has been of long duration, fully inspect sewer piping downstream of the plant to determine its integrity.
- If the Pinellas County POTW will no longer accept wastewaters from the plant, then the wastewater shall be pumped from the lift stations or the in-ground holding tanks to tanker trucks and transferred to a treatment facility capable of receiving the wastewater.



NOTE: 3/4" STAINLESS STEEL BALL VALVES & FITTINGS  
SUBSTITUTED FOR PVDF AND/OR CPVC VALVES & FITTINGS  
IN DETAILS A & B.

CHEMICAL FEED/  
STORAGE AREA

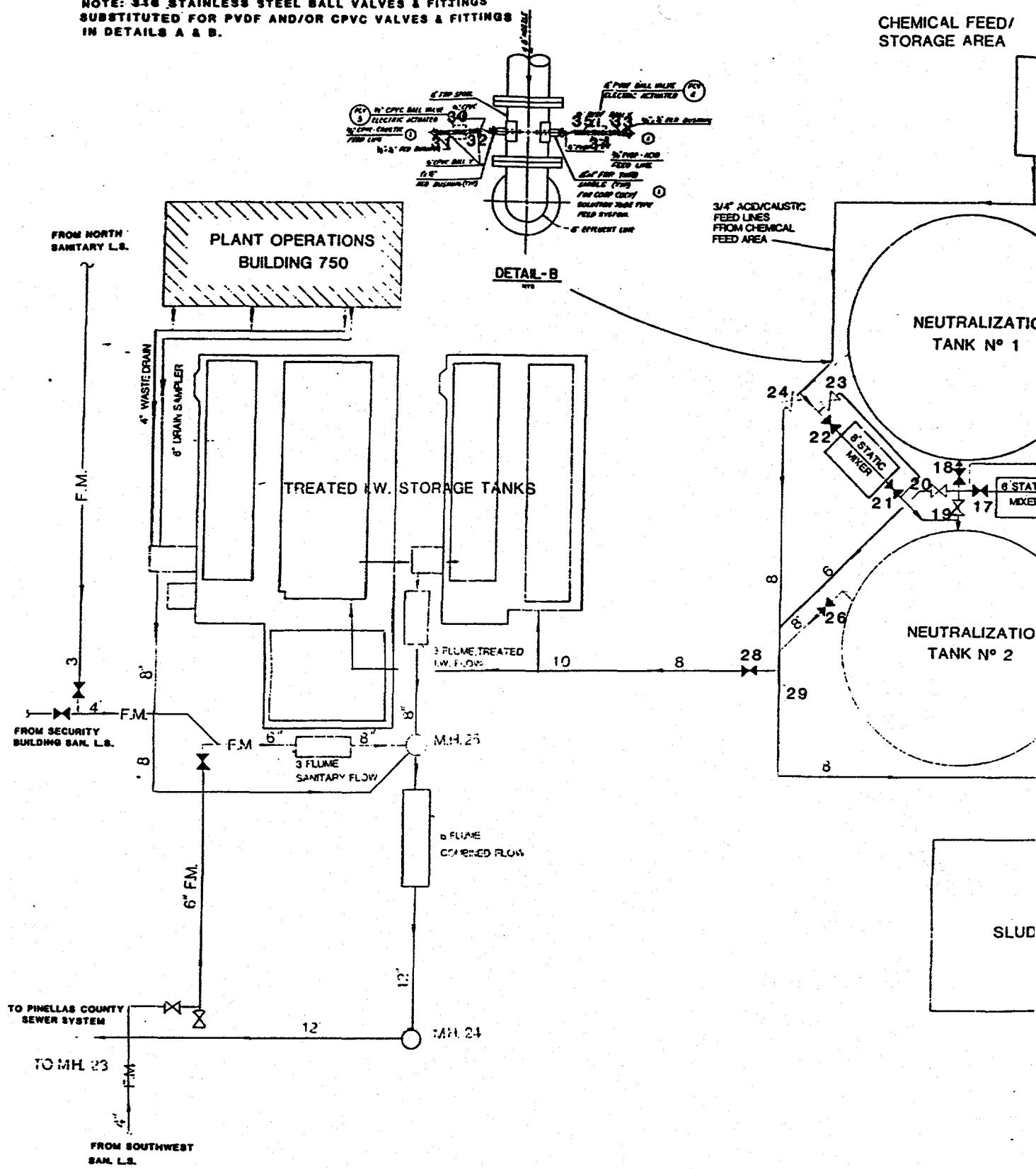
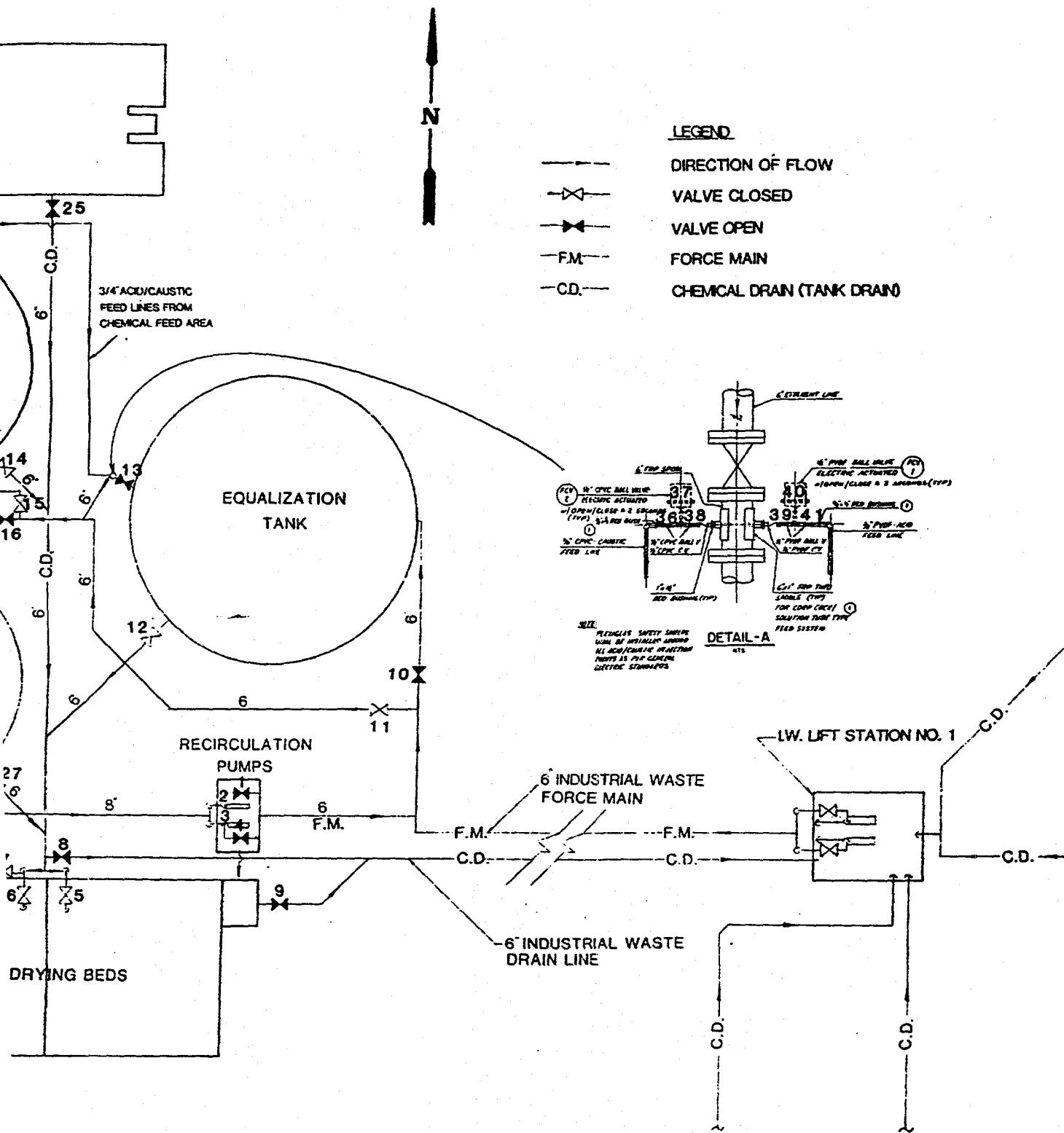


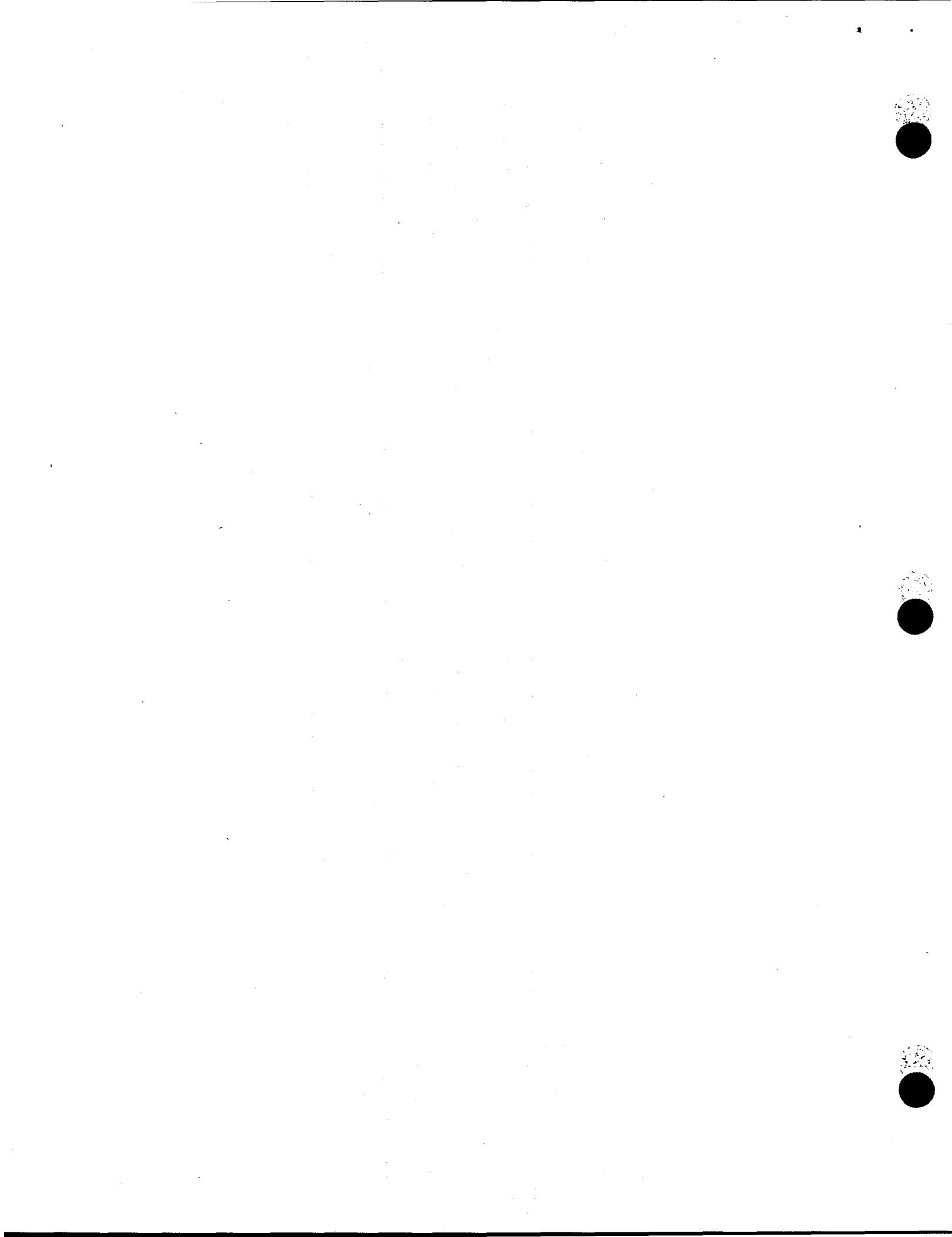
Figure 3. Flow Diagram and Valve Schedule for the Neutralization Facility



#### 4.0 PREVENTION OF RECURRENCE

Once the emergency is controlled, the emergency coordinator retains his authority to direct site activities until all cleanup activities are completed and normal site operations are resumed. Specific activities are listed below.

- The emergency coordinator will take all necessary steps to ensure that a secondary release, fire, or explosion does not occur as a result of the initial incident. Procedures that will be carried out include monitoring of all pressure valves; inspection of any leaks or cracks in pipes, valves, tanks, and containers; inspection for gas generation; and isolation of all collected waste materials.
- All operations that were initially shut down in response to the incident will not be reactivated until the emergency coordinator gives the "go-ahead" signal.
- The emergency coordinator will see that all residues, and contaminated or recovered materials are disposed of properly, including proper manifesting and record keeping.
- The emergency coordinator will see that all emergency equipment is cleaned and/or decontaminated, repaired, or replenished, as necessary, until fit and ready for use.
- After completion and compliance with above, the emergency coordinator will notify the appropriate site and corporate contacts, local authorities and EPA or state representatives, as specified in Section 0.
- The emergency coordinator will participate in debriefings with site supervisory and/or operating personnel and local authorities involved to assess preparedness and prevention activities, response activities, casualty control, and evacuation procedures. Based on this review, suggestions for revisions to the Contingency Plan, if appropriate, will be made to site management.



## H. STORAGE AND TREATMENT OF RELEASED MATERIAL

### 1.0 GENERAL PROCEDURES

Following the determination and correction of the cause of the emergency, the emergency coordinator will ensure that all released hazardous waste and the products generated through response to the crisis are containerized prior to their proper disposal.

### 2.0 SPECIFIC PROCEDURES

#### 2.1 Container Storage Areas-Buildings 1040 and 1000

##### 2.1.1 Fire or Explosions.

- All containers will be inspected for damage.
- Damaged containers will have their contents transferred to sound containers.
- Any spilled material from damaged containers will be contained by absorbents and placed in new containers pending proper disposal. Since the drums are segregated according to their contents, a separate drum for each type of waste will be used.
- All damaged containers will be triple rinsed with an agent capable of removing the remains of the hazardous waste. The resulting liquid will be drummed pending proper disposal.
- All wastes generated (including firefighting waters and foams) during the emergency response will be drummed and labeled. The labels will attest to the drum's contents, including physical state, quantity, and hazardous waste contaminant(s).
- Plant Health Physicist shall be notified immediately in case of fire or explosion in which Building 1000 is involved.

### 2.1.2 Spills or Material Release.

- The materials generated during the emergency response (including berms that may have contacted the spilled material) will be drummed and labeled. The labels will attest to the drum's contents, including physical state, quantity, and hazardous waste contaminant(s).
- Plant Health Physicist shall be notified immediately in case of spill or material release in or from Building 1000.

## 2.2 Tank Storage Area

### 2.2.1 Fires or Explosions.

- The liquid generated by the response will be pumped from the diked area into containers or, if the quantity is great enough, into the empty tank (Tank No. 1) at the tank farm. The containers or tank will be labeled to indicate contents, including physical state, quantity and hazardous waste constituent(s), pending proper disposal.
- The diked area will be rinsed using a solvent capable of removing the remaining traces of hazardous material. The resulting liquid will be containerized pending proper disposal.

### 2.2.2 Spills or Material Release.

- If inside the diked area, the liquid will be pumped into containers or the empty tank on-site. The containers or tank will be labeled to indicate contents, including physical state, quantity and hazardous waste present, pending proper disposal.
- The diked areas will be rinsed using an agent capable of removing the remaining traces of the hazardous waste. The resulting liquid will be containerized pending proper disposal.
- If outside the diked area, the liquid will be contained by berms and absorbed with available materials. The contaminated absorbent and berms will be containerized and labeled to indicate contents, including physical state, quantity, and hazardous wastes present, pending proper disposal.

## 2.3 Reactive Metals Treatment Facility

### 2.3.1 Fires or Explosions.

Due to the small amounts of materials treated in this manner and the danger associated with this reaction, any fire or explosion will be allowed to go to completion. The remaining residues are nonhazardous and will be disposed of accordingly.

### 2.3.2 Spills or Material Release.

The oil generated from the containment of a spill or release will be absorbed. The absorbent material will be containerized and labeled to indicate its contents, including physical state, quantity, and reactive waste present, pending proper disposal.

## 2.4 Sludge Holding Tank

### 2.4.1 Spills or Material Release.

Should a discharge of this sludge occur, it will be absorbed, containerized, and labeled to indicate its contents, including physical state and quantity, pending proper disposal.

## 2.5 Thermal Treatment Facility

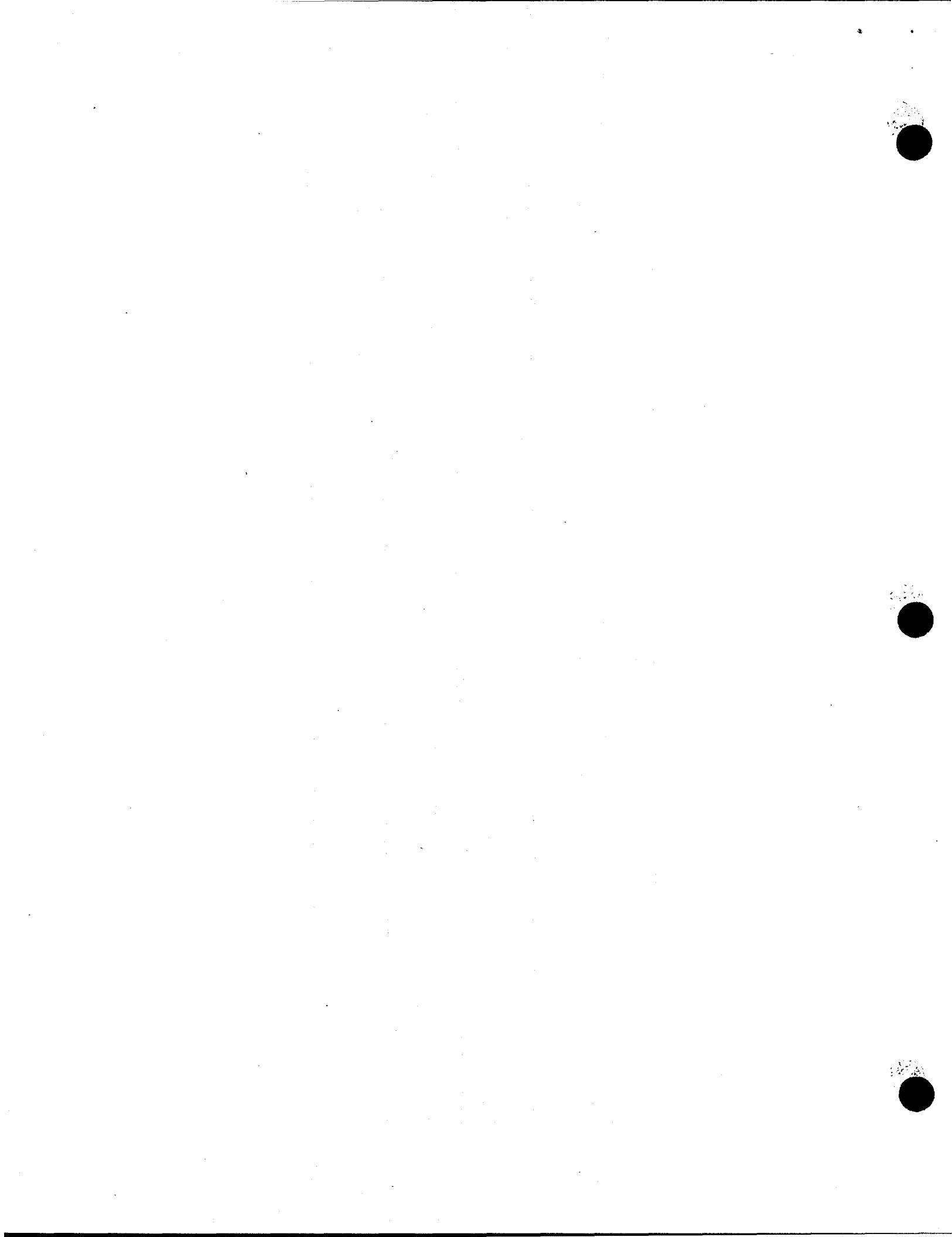
### 2.5.1 Fires or Explosions.

In the event of an unintentional fire or explosion, the waste would be completely oxidized. If heat paper is involved, any residue will be collected, drummed, and handled as a hazardous (toxic) solid waste.

## 2.6 Neutralization Facility

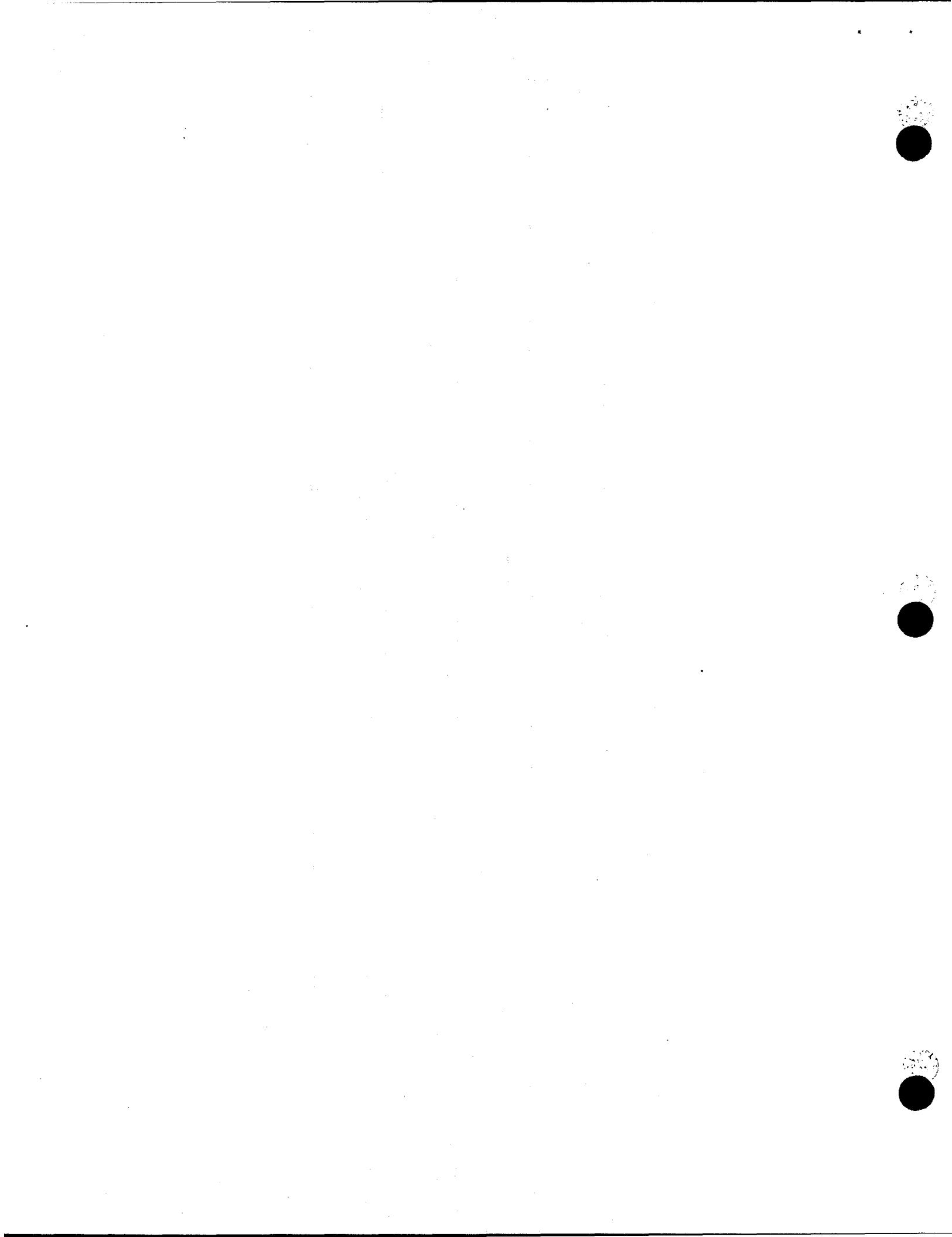
### 2.6.1 Spills or Material Release.

Any spills will be neutralized. Since corrosivity due to high or low pH is the only hazard the wastewater poses, no further action is required.



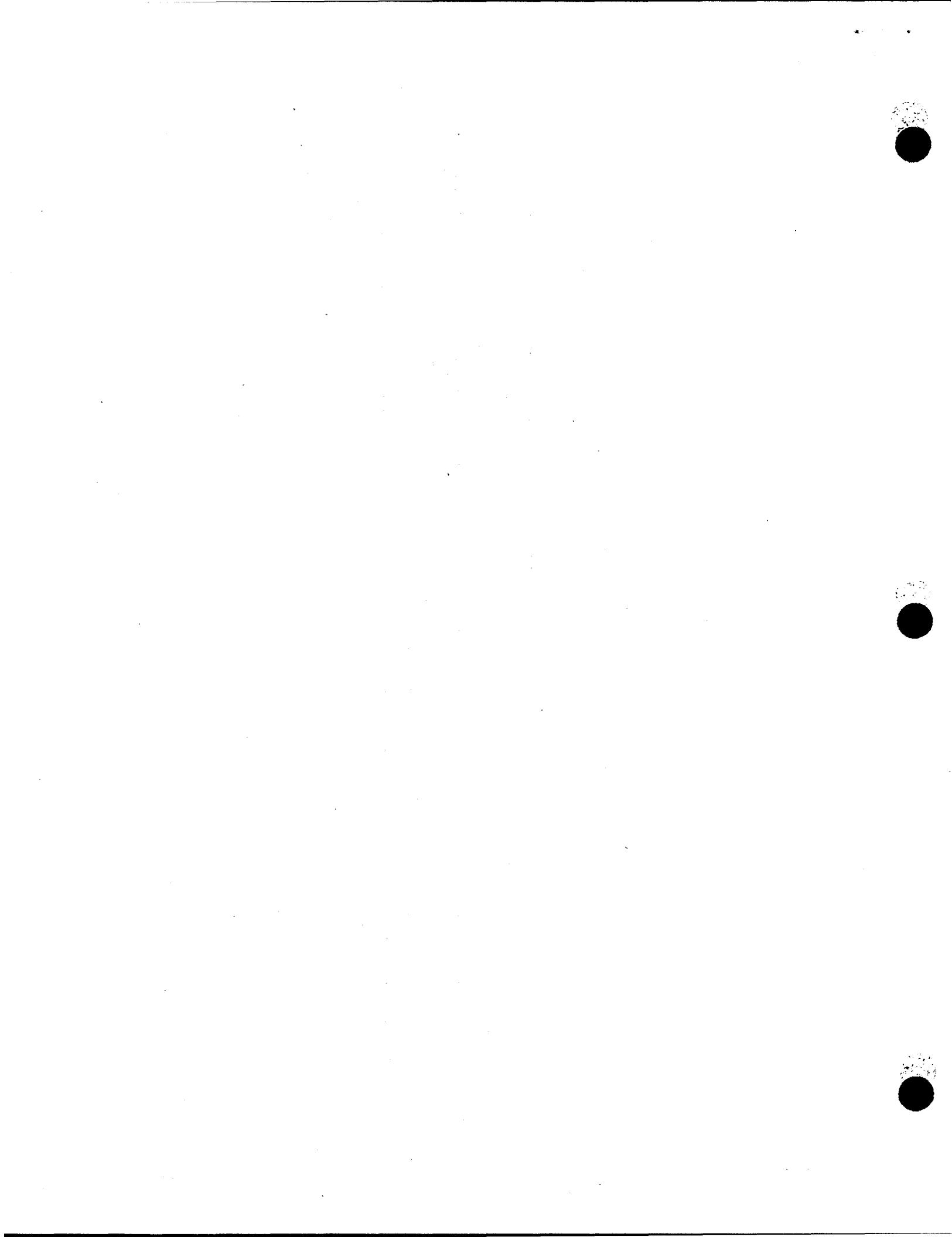
## I. PREVENTION OF INCOMPATIBLE WASTE

During an incident requiring implementation of the Contingency Plan, all treatment and storage of additional hazardous waste will be halted in that area. The incompatible waste at the affected site will be removed, unless the emergency coordinator determines that transport presents a greater hazard to human health or the environment. In that case, the incompatible material will be protected by water spray, berm construction, or other suitable method. The incompatible waste will be protected until site cleanup is completed.



## J. CONTAINER AND TANK LEAKAGE AND SPILLS

The specific procedures for responding to spills and leaks from containers and tanks are covered in Sections G and H.



## K. EMERGENCY RESPONSE EQUIPMENT

Various types of response equipment are available at the Pinellas Plant to assist in an emergency situation. Table 3 lists the equipment, and Figure 4 shows their location.

Table 3. Emergency Response Team Equipment

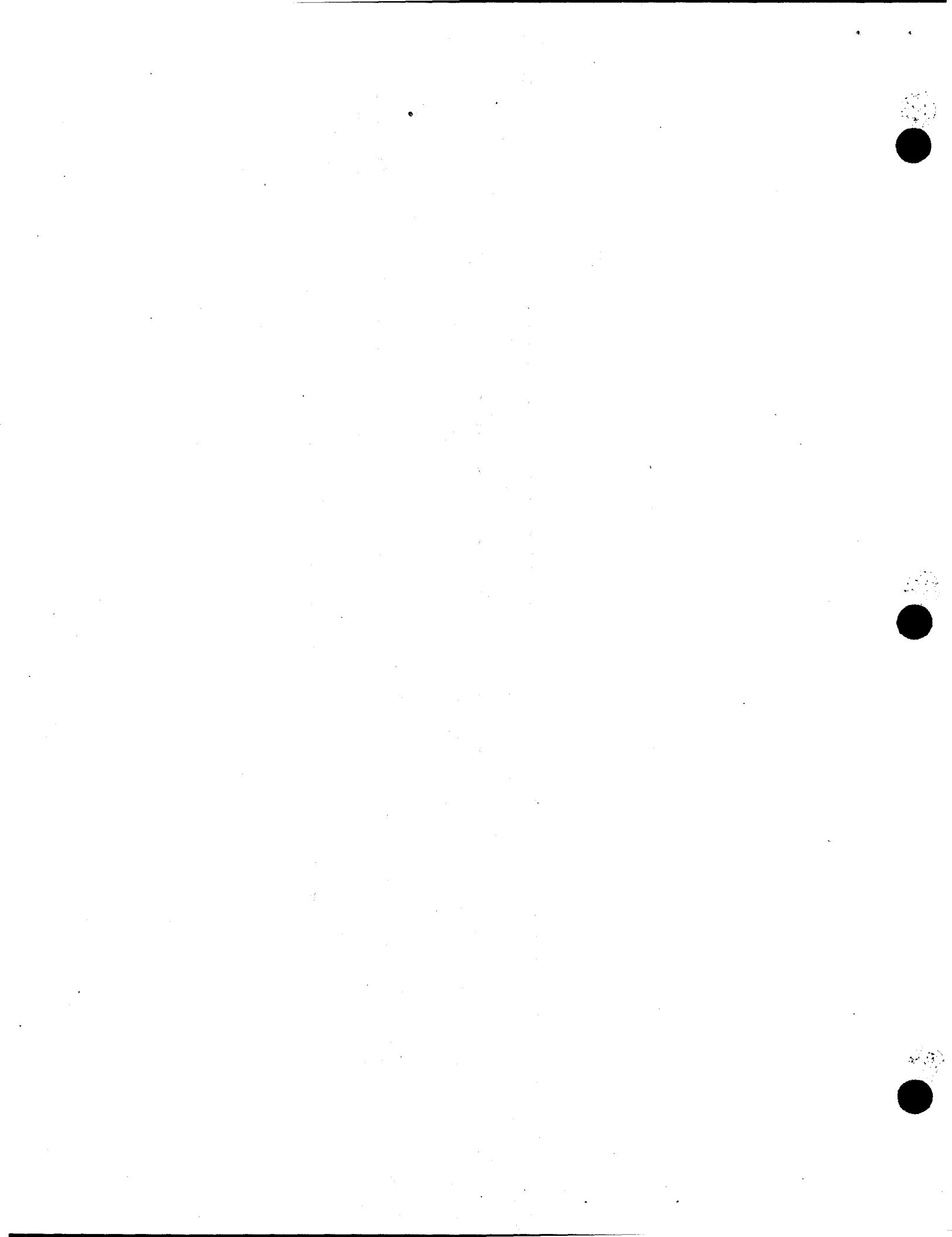
Equipment	Location	Capabilities
<b>FIRE CONTROL</b>		
• Fire brigade	Building 700	Minimum 6 members at all times
• Automatic wet-pipe Sprinkler system	Container Storage Facility	Class A fires
• Electric firefighting truck (3)	Building 100	Miscellaneous firefighting
• Mini-pumper	Building 700	250 gpm; 300 gallon tank
• Hose reel	Shown in Figure 4	150 ft. hose
• Fire hydrants	Shown in Figure 4	Class A fires
• Fire extinguishers	Shown in Figure 4	Class A, B, C fires
• Foam concentrate (150 gal)	Building 700	Fire suppression foam
<b>PERSONNEL PROTECTION</b>		
• Protective clothing (11 sets)	Mini-tanker (6), Electric Truck (5)	
• Self contained breathing apparatus (9)	Mini-tanker (6), electric truck (3)	
<b>MEDICAL CENTER</b>		
• 1 physician	Building 100	Cardiac emergency equipment
• 3 registered nurses		ECG
• 2 Beds		2-Defib. units
• 3 treatment rooms		Pulmonary function
		X-ray
		IV setups
		Oxygen
<b>EMERGENCY DECONTAMINATION</b>		
• Steam cleaner	Building 700	Decontamination of buildings, equipment, etc.
<b>EMERGENCY COMMUNICATION/ALARM SYSTEMS</b>		
• Emergency telephone system	Plantwide	Summoning response
• Loudspeakers	Plantwide	Broadcasting evacuation
• Radio transceivers	Security Personnel	Summoning response
<b>ELECTRIC TRUCK</b>		
• 1 Fire Extinguisher, halon	Building 700, Bay 3	Electrical and liquid fires Electrical, liquid and combustibles
• 1 Fire Extinguisher, press water		Class A fires only
• 4 gallons, base neutralizer		Neutralize caustic spills
• 4 gallons, acid neutralizer		Neutralize acid spills
• 1 acid neutralizer kit		Neutralizer small acid spills
• 2 caustic neutralizer kit		Neutralizer small caustic spills
• 50 lbs Dry Sorb		Mineral substance for oil and liquid adsorption
• 1 pkg. hydrofluoric acid spill pads		Adsorb hydrofluoric acid spills

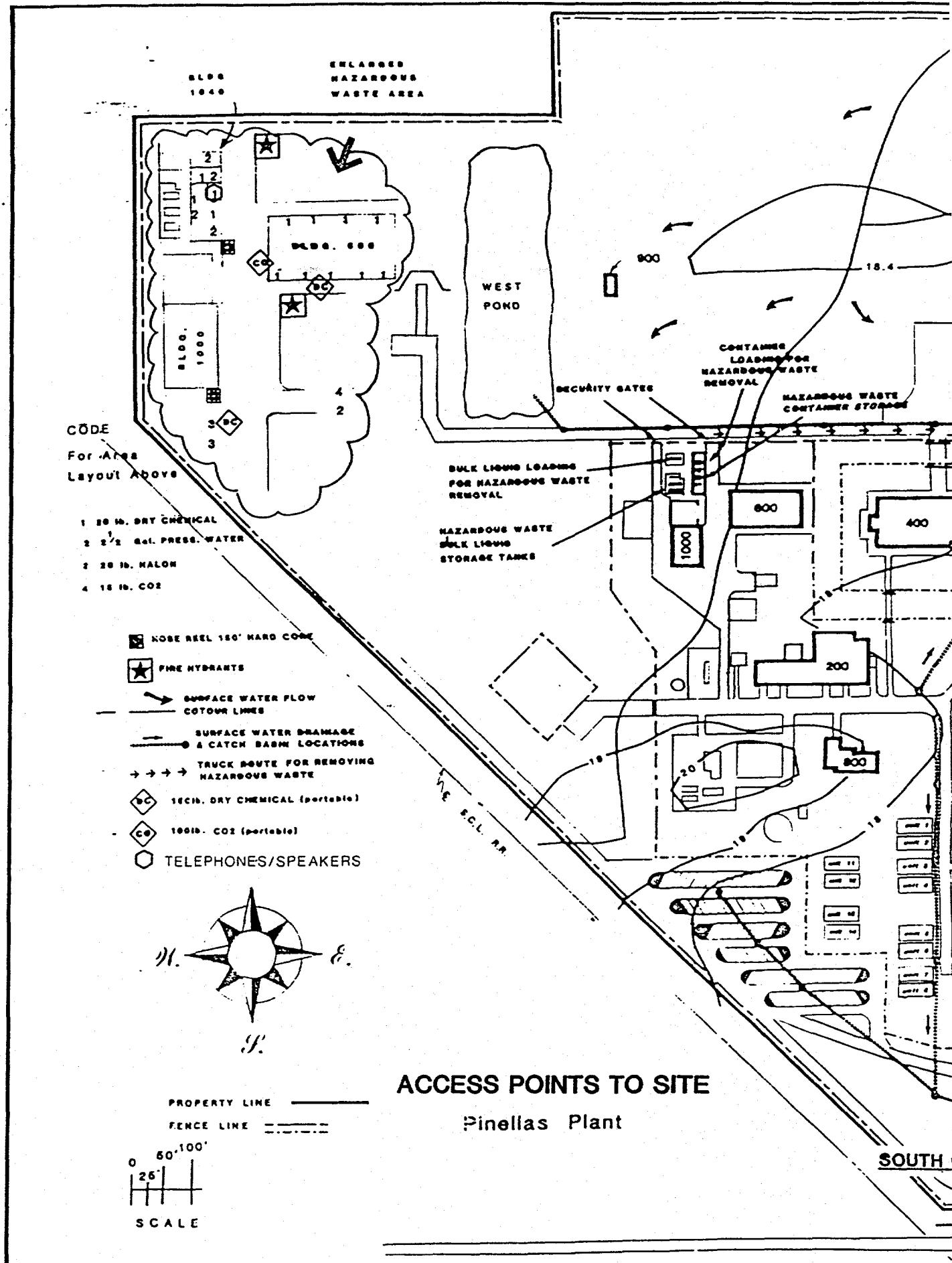
Table 3 (Continued). Emergency Response Team Equipment

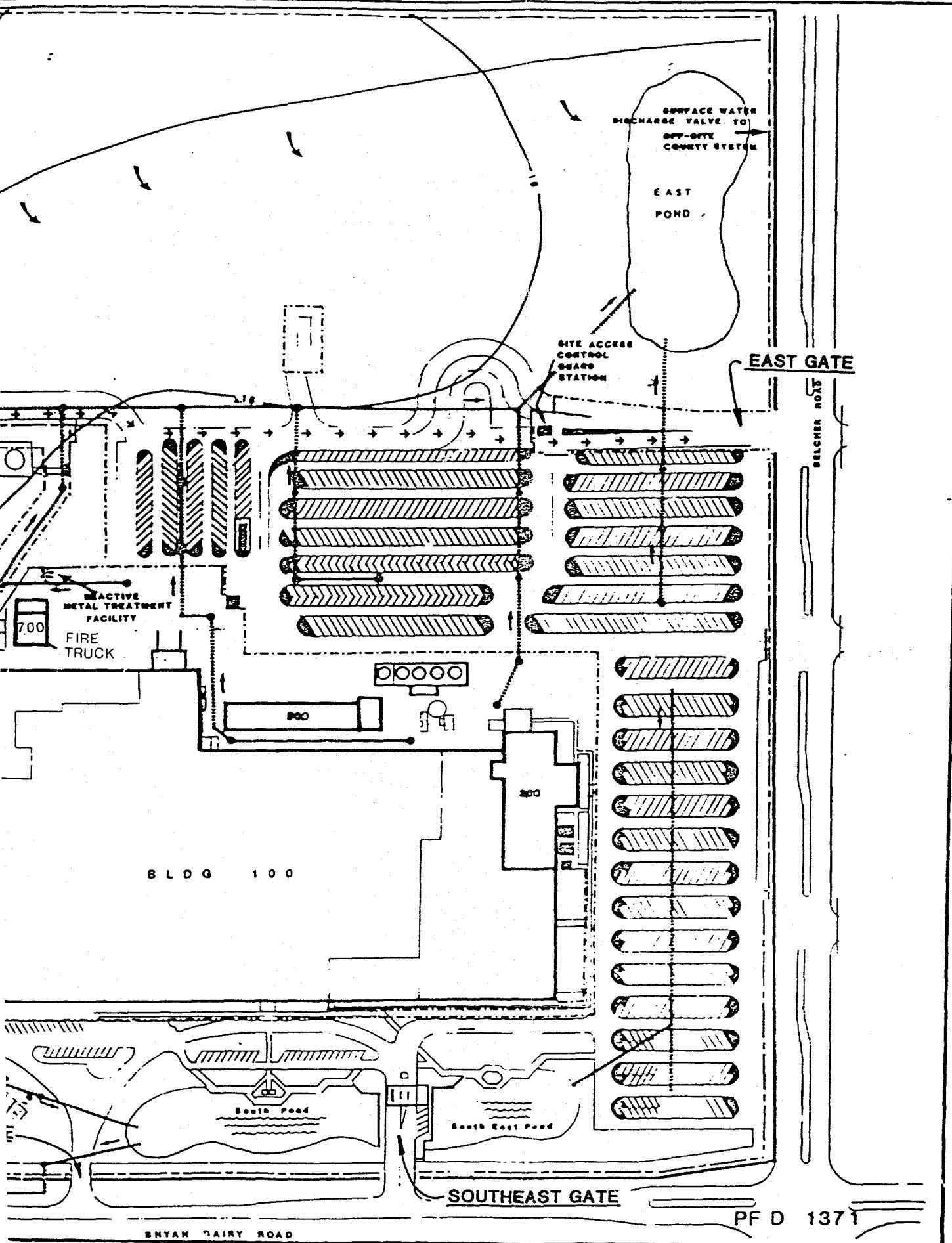
Equipment	Location	Capabilities
<ul style="list-style-type: none"> <li>• 1 bx mercury vapor adsorbent</li> <li>• 1 bx flammable solvent spill kit</li> <li>• 2 MSA dual purpose SCBA, with 30 min. cylinder</li> <li>• 1 MSA fully-encapsulated protective clothing suit</li> <li>• 4 Saran fully encapsulated protective clothing suits</li> </ul>		Dry adsorbent for small mercury spills Contains adsorbent scoop and disposal bags Self-contained breathing air in chemical spill environment Maximum personnel protection in chemical spill environment Intermediate personnel protective, for material known to be compatible with Saran
<ul style="list-style-type: none"> <li>• 25 Tyvek suits</li> <li>• 2 warning signs</li> <li>• 2 Warning signs</li> <li>• 1 spark proof tool kit</li> <li>• 1 Spark Proof Shovel</li> <li>• 1 hazardous material spill response kit</li> <li>• 1 pkg. disposal bags</li> <li>• 2 squeegees-large</li> <li>• 1 tongs</li> <li>• 4 pair of gloves</li> <li>• 1 barrier tape</li> </ul>		Protective clothing for minor chemical spills "Danger Handling Chemicals" "Danger Chemical Spill Keep Away" Hammer, pliers, screwdriver, wrench Flammable liquid adsorbent pickup Various size plugs and tools to repair leaking drums Temporary containment of collected spill residue Consolidate spill residue Avoid hand injury during fragment collection Protection when handling chemicals Control access to spill area
TRAILER, <ul style="list-style-type: none"> <li>• 1 Sol-V Sorb kit</li> <li>• 100 lbs Dry Sorb</li> <li>• 5 gallons Plug and Dike</li> <li>• 5 gallons, "cold clean" petroleum emulsifier</li> <li>• 40 adsorbent pads</li> <li>• 10 spill pillows</li> <li>• 3 adsorbent booms</li> <li>• 2 squeegees-large</li> <li>• 4 gallons acid neutralizer</li> <li>• 4 gallons caustic neutralizer</li> <li>• 2 MSA fully-encapsulated suits</li> <li>• 2 MSA dual purpose SCBA, with 30-min cylinder</li> </ul>	Building 700, Bay 3	Towable by electric truck Contains adsorbent, scoop, gloves and goggles Material to surround a spill Plug leaking containers Emulsify liquids to reduce flammability Small chemical spills, excluding acids and caustic Diking material or adsorbent 12-foot adsorbent booms Spill residue cleanup Neutralize acid spills Neutralize caustic spills Personnel protective clothing Self contained breathing air
MISCELLANEOUS EQUIPMENT	Building 700, Bay 3	Recovery of damaged containers Spare for response team Portable power equipment
• 3 10-foot ladders		
• 2 salvage drums 85-gallons		
• 1 MSA encapsulated Suit		
• 2 electrical extension cords		

Table 3 (Continued). Emergency Response Team Equipment

Equipment	Location	Capabilities
<ul style="list-style-type: none"> <li>• 53 Saran, fully-encapsulated suits (17 large, 36 small)</li> <li>• 44 Tyvek coveralls (large)</li> <li>• 5 adsorbent pads</li> <li>• 5 gallons Plug and Dike dry</li> <li>• 2.5 gallons Plug and Dike premixed</li> <li>• 1 vacuum cleaner, explosion proof, 55-gallon tank</li> <li>• 6 lbs mercury adsorbent</li> <li>• 1 sprayer, containing 3 gallons of acid neutralizer solution</li> <li>• 1 sprayer containing 3 gallons of caustic neutralizer solution</li> <li>• 30 lbs slaked lime</li> <li>• 3 lbs sodium carbonate</li> <li>• 2 rolls barricade rope</li> <li>• 1 roll polyethylene sheeting</li> </ul>	Building 1040, Bay 1	Intermediate personnel protection, for material known to be compatible with Saran Minor chemical spills Small chemical spills Add water mix putty for leaking container control Premixed putty for leaking container control Flammable liquid spills Metalic powder; mercury spill control Acid neutralization in areas not easily accessible Caustic neutralization in Area not easily accessible Neutralizing acid spills Neutralizing acid spills Control access to spill area Protective covering
MISCELLANEOUS MATERIAL	Shed West of Building 1040	
<ul style="list-style-type: none"> <li>• 24 3M mini-booms</li> <li>• 200 ft. 3M Booms</li> <li>• 24 lbs 3M adsorbent</li> </ul>		Containing all types of liquid spills Containing all types of liquid spills Chipped fibrous material for spreading over chemical spills







## 1.0 SPILL CONTROL EQUIPMENT

The container storage facility and the tank farm have containment sump systems. Other spill control equipment maintained at the container storage facility includes: sorbent booms capable of containing and absorbing floating discharges; acid absorbents capable of absorbing and neutralizing acidic spills; a leak response kit containing tools and materials capable of safely plugging leaking drums and containers; and an explosion proof vacuum cleaner capable of removing both liquid and solid spills.

## 2.0 FIRE CONTROL EQUIPMENT

The container storage facility is protected by an automatic wet-pipe sprinkler system. This system is fed from the plant's fire protection water system, which consists of a 1000 gal/min electric pump taking suction from a 150,000-gallon water tank and two 1500 gal/min diesel-driven pumps taking suction from a 400,000-gallon water tank. Both tanks are reserved for fire protection use and have no connections to the domestic water system, except for fill lines. If all pumps should fail, a connection between the fire protection water system and the county system would automatically open. The sprinkler system alarm which indicates activation is connected to the continuously-manned Security Patrol Office.

Adequate extinguishers of the proper type are provided. In addition, hose reels with 150 feet of 1-1/2 inch fire hose are located throughout the plant. The locations of these fire protection systems are shown in Figure 4.

A trained fire brigade is maintained. While the number of members varies by shift, a minimum of six members are on duty at all times. All are trained in the use of self-contained breathing apparatus, hose line handling and extinguisher operations. Equipment for fire brigade use is carried on a 250 gal/min mini-pumper. Hydrants to supply this truck are located around the plant (Figure 4).

### 3.0 PERSONNEL PROTECTIVE DEVICES

Both the plant's fire brigade and waste management unit maintain personal protective devices. The fire department has 11 sets of standard protective firefighting clothing, and 9 self-contained breathing apparatuses. The waste management unit has 4 self-contained breathing apparatuses and more than 30 protective coveralls. The spill cart located in the container storage facility contains protective shoe coverings, gloves, acid sleeves, aprons, and splash goggles.

### 4.0 MONITORING EQUIPMENT

The plant fire brigade maintains explosimeters, and the industrial hygiene operation maintains a portable gas chromatograph. These can be used to monitor hazardous conditions for response personnel during an emergency. Litmus paper is readily available through the waste management unit to check corrosivity of wastewater spills. The various on-site laboratories maintain additional analytical instrumentation should special tests be required.

### 5.0 FIRST AID AND MEDICAL SUPPLIES

The plant maintains a modern medical facility staffed by one full-time physician and 2 registered nurses. The center is staffed from 7:00 a.m. to 12:00 midnight, five days a week (Monday through Friday). Security supervisors monitor and refer medical problems from midnight to 7:00 a.m., and on weekends.

The medical center has a two bed capacity for holding patients, and three treatment rooms for out-patient care. A variety of medical equipment is available including:

- Electrocardiograph (ECG)
- Cardiac emergency equipment
- 2 defibrillation units
- I.V. setups
- Suction
- Oxygen
- Blood drawing equipment
- X-ray
- Pulmonary function

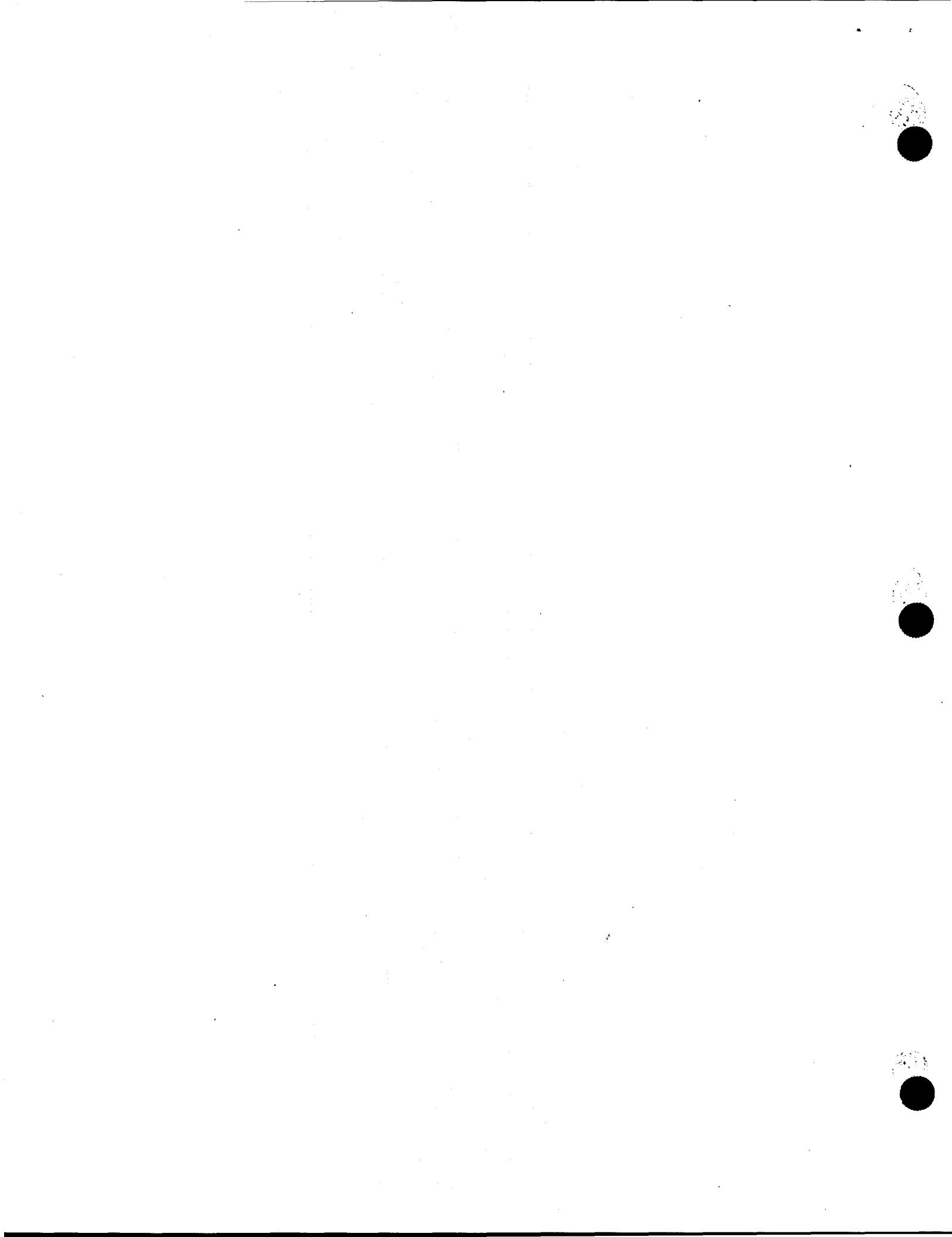
Medical and security personnel have telephone access to health physicists and safety employees on a 24-hour basis in case of emergency.

## 6.0 EMERGENCY DECONTAMINATION EQUIPMENT

Steam cleaning is contracted on an as-needed basis. Various cleaning solvents are readily accessible at the plant.

## 7.0 EMERGENCY COMMUNICATION AND ALARM SYSTEMS

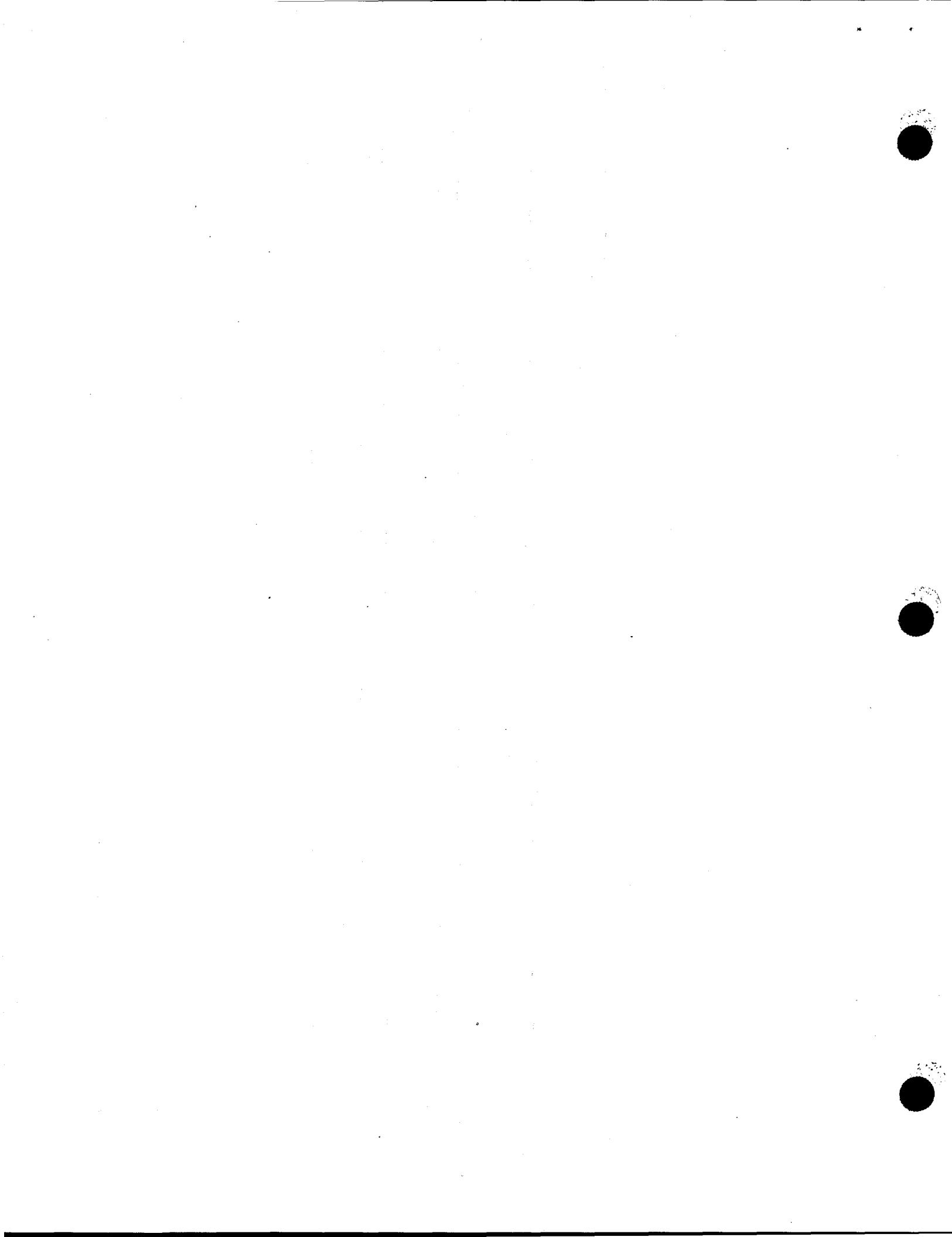
Communication and alarm systems for the plant provide rapid means for personnel to contact the plant's Communications Control Center. Telephones are located in all areas of the plant, and all Security Inspectors carry radio transceivers that put them in contact with the Communications Control Center. The center, in turn, activates an emergency alarm system and provides information to all personnel on-site by speakers located in all work areas of the plant. The Communications Control Center has 2 dedicated phone lines to the Pinellas County Sheriff's Department.



## L. POST EMERGENCY RESPONSE

### 1.0 EQUIPMENT MAINTENANCE

Prior to resuming operations, all emergency equipment used in the response activity must be cleaned and readied for use. This procedure will be accomplished by rinsing or wiping all equipment with agents capable of removing all traces of the hazardous waste that might have been contacted during the response activities. The liquids and solids resulting from this cleaning will be drummed separately and labeled to indicate their contents, including physical state, quantity and hazardous waste present, pending proper disposal. The emergency coordinator will document proper equipment maintenance in the facilities operating log.



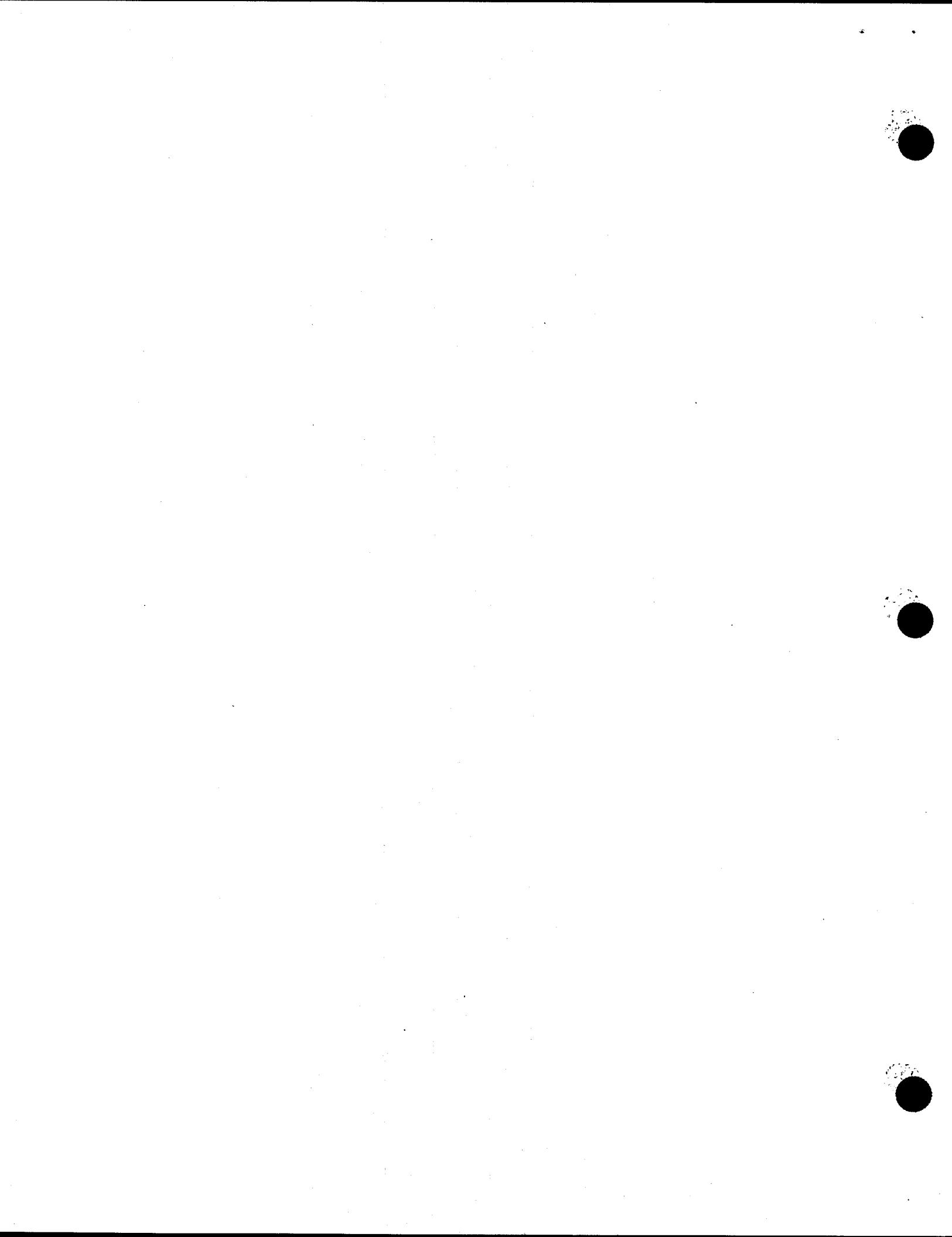
## M. COORDINATION AGREEMENTS

A written contract is provided for back-up firefighting assistance from the Seminole Fire Department. This department has four stations, the closest of which is within 1.5 miles of the Plant. A copy of this contract is included in Appendix C.

Administrative personnel and firefighters of the Seminole Fire Department are routinely brought on-site to familiarize them with the potential emergency services that they may be called upon to perform.

Copies of this Contingency Plan have also been submitted to:

- Pinellas County Sheriff's Department
- Seminole Fire Department
- Pinellas County Emergency Medical Service
- GSX Services, Inc.
- Enviropact, Inc.
- Pinellas Park Fire Department
- Pinellas County Emergency Management Administration



## N. EVACUATION PLAN

### 1.0 SITE LOCATION AND ACCESS

As described in Section A of this plan, the Pinellas Plant facility is located 1.5 miles northwest of Pinellas Park, Florida. The site can be reached from Bryan Dairy Road on the south. The area surrounding the site is predominantly commercial/manufacturing, with residences located within 1/2 mile to the south and north (Figure 1).

The plant is designed and operated to facilitate access to all points across the site for inspection and emergency response. All storage areas are equipped with bay doors. Roadway space is maintained (Figure 2). Figures 5, 6, and 7 shows the location of hazardous waste stored in Buildings 1040 and 1000 respectively. Aisle space is adequate for the proper inspection of containers.

Access from off site is restricted. During an emergency event, security will be maintained. Off-site parties assisting in the response efforts will be allowed unrestricted access. A detailed enumeration of personnel on-site and admitted to the site during an emergency will be kept by security. Access points to the site which are utilized during an emergency situation will be continuously manned, to the extent possible, as long as their use is necessary. Potential access points are shown in Figure 2.

Procedures for the evacuation of the site and surrounding areas are detailed in the following sections.

### 2.0 CRITERIA FOR EVACUATION

The emergency coordinator will order an evacuation of the site when the release of hazardous waste seriously threatens the health and safety of plant personnel by potential fire, explosion, or generation of toxic fumes.

### 3.0 SITE EVACUATION

The emergency coordinator is authorized to call for complete evacuation of the site in response to an actual or potential emergency situation which threatens the health and safety of site personnel. He may take this action based upon his analysis of the situation or at the request of the on-scene coordinator.

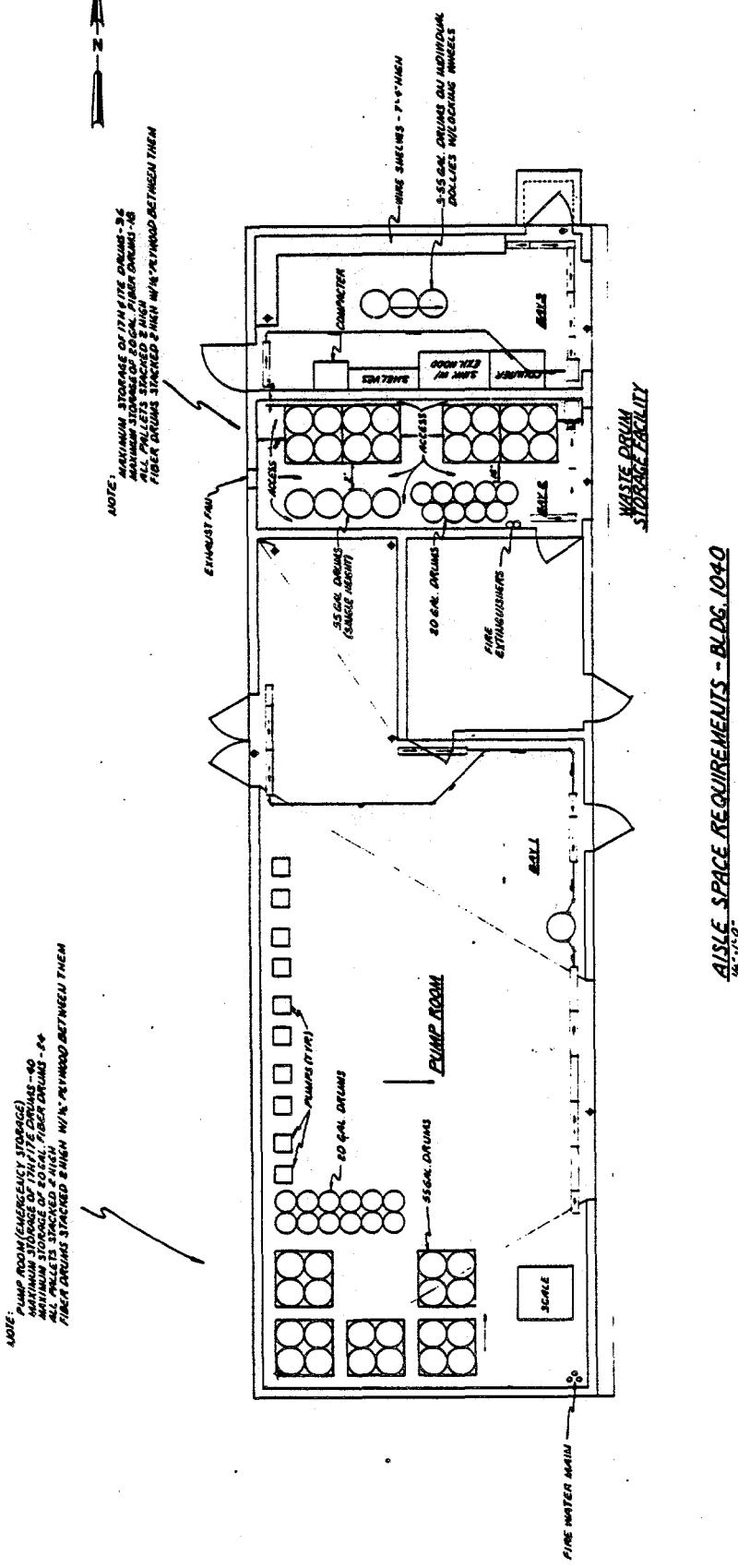


Figure 5. Aisle Space Requirements and Location of Hazardous Waste Stored in Building 1040

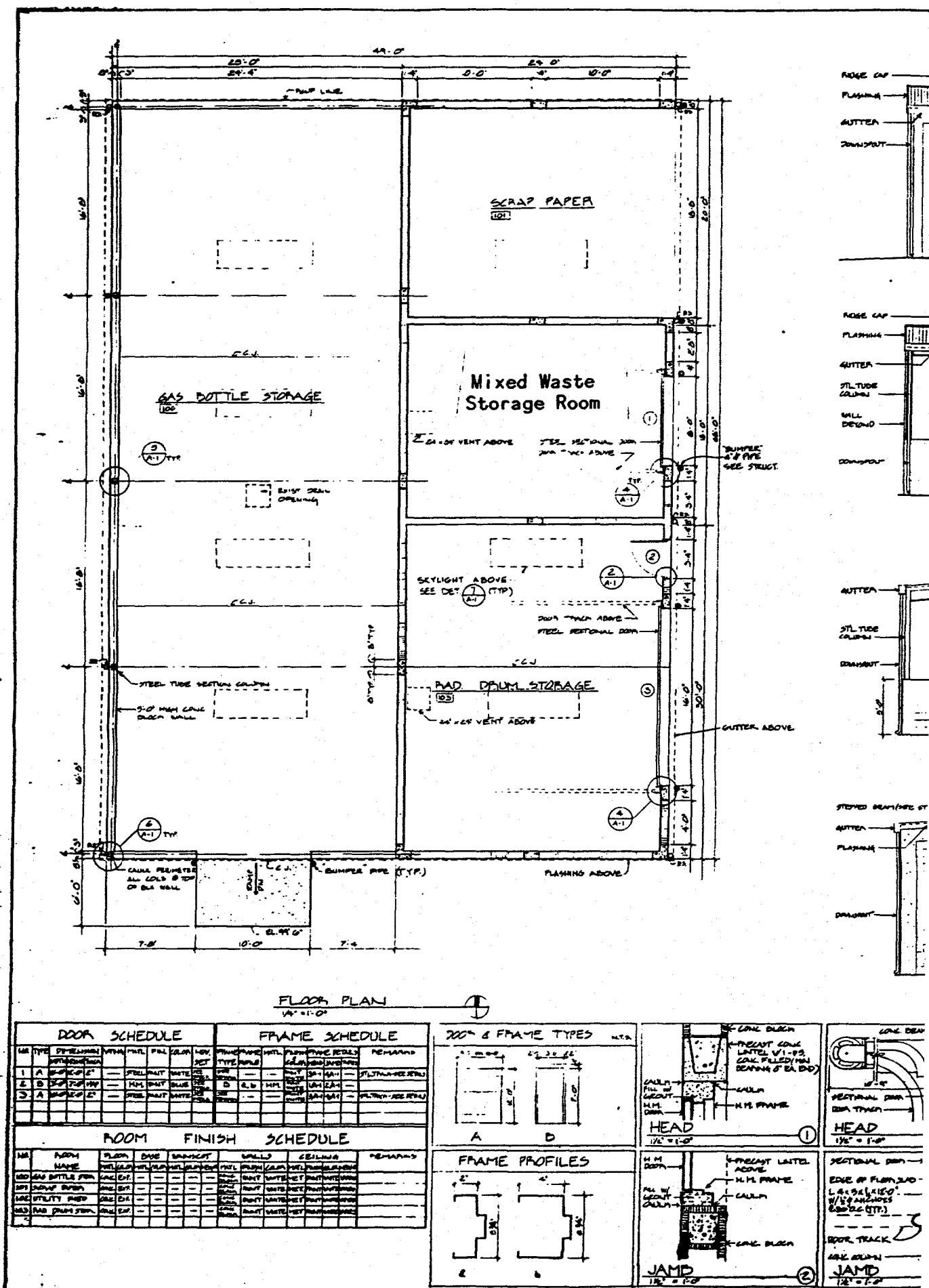
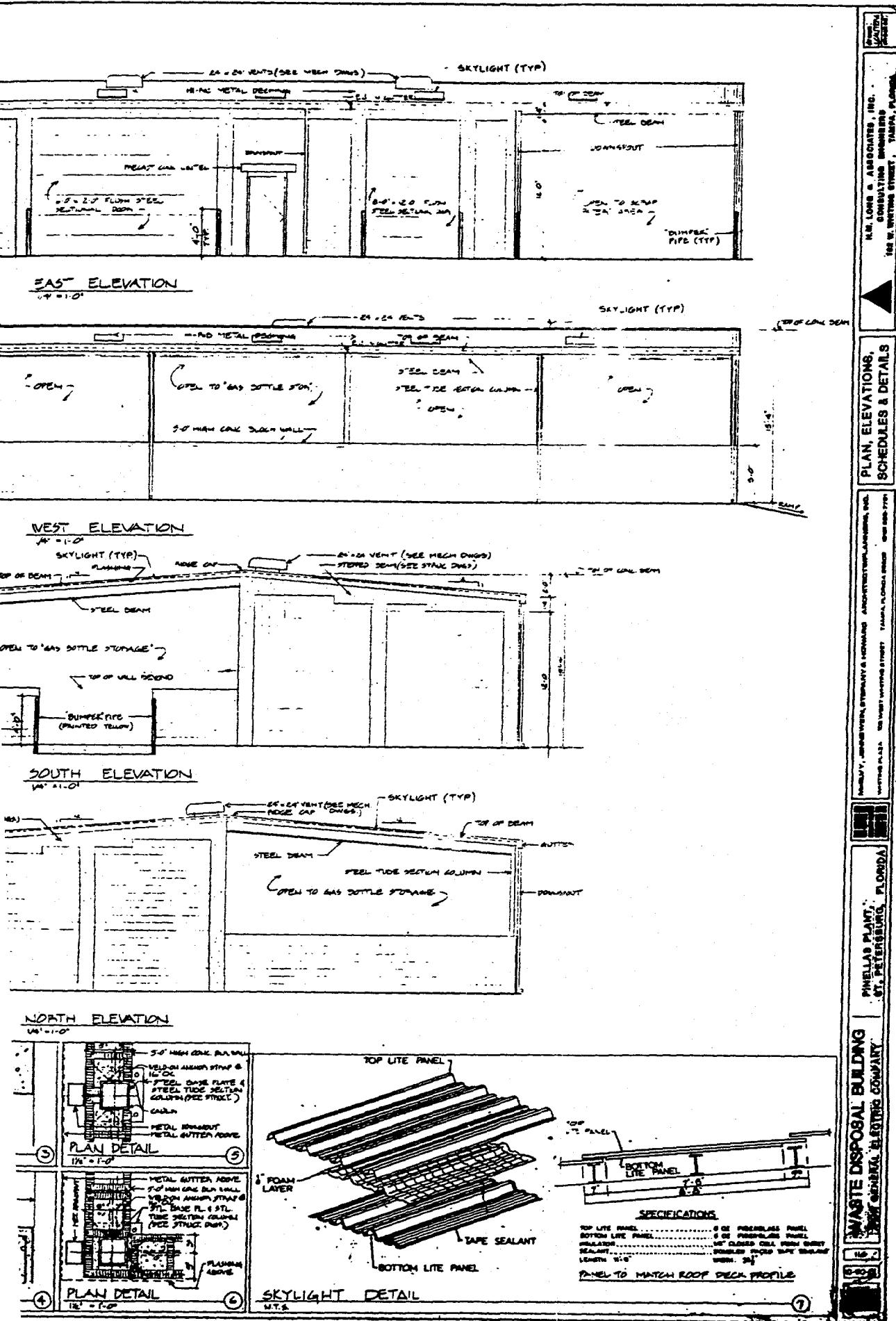
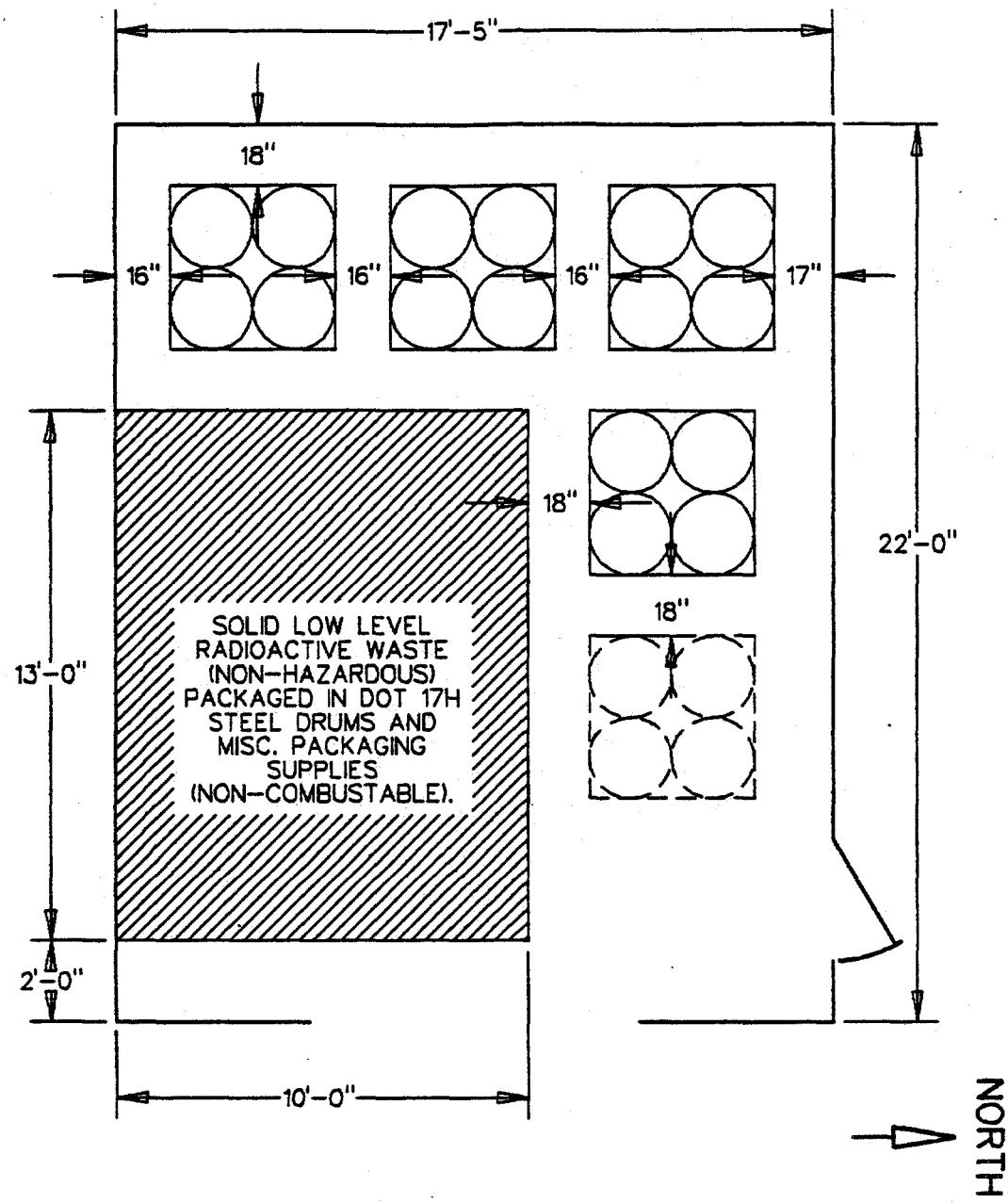


Figure 6. Location of Hazardous Waste Stored in Building 1000





ALL MATERIAL STORED IN THIS ROOM WILL BE  
PLACED ON PALLETS - NOT DIRECTLY ON THE FLOOR.

NON-SHADED AREA REPRESENTS ACCESS AND STORAGE FOR  
MIXED WASTE DRUMS (55 GAL).

Figure 7. Aisle Space Requirements and Location of Mixed Waste Storage in Building 1000, Center Bay

The following actions will be taken if the emergency coordinator orders a site evacuation:

- The Emergency Coordinator will notify the following agencies of the site evacuation: Pinellas County Sheriff's Department (587-6200) and Florida State Highway Patrol (893-2711).
- The emergency coordinator will communicate evacuation instructions to the Security Communications Inspector using the facility's emergency telephone number (2191).
- The Security Communications Inspector will sound the evacuation signal as follows:
  - One cycle of the emergency signal will be sounded on the emergency alarm (warbling tone).
  - One of the following announcements will be made three times:

Attention: This is a zone evacuation; evacuate zone 1040.  
Attention: This is a plant evacuation; evacuate all Zones.
- Personnel at the hazardous waste facility will proceed to the nearest exit and leave the building. Once outside, personnel shall proceed to the North Gate Guard House area.
- All vehicle traffic will cease in order to allow safe exit of personnel and movement of emergency equipment.
- An evacuation may well be the result of a fire. If a Signal "7" is sounded in conjunction with the evacuation signal, fire brigade members will respond directly to the fire. If no Signal 7 has been sounded, fire brigade members will evacuate their respective areas and, after leaving the building, separate from their groups and report to the fire house in Building 700. If emergency medical personnel are required, five employees carrying beepers will be contacted by the plant's communication inspector.

- Evacuation should proceed as follows:
  - If upwind of incident, evacuate in upwind direction.
  - If downwind of incident, evacuate perpendicular to wind direction over the most accessible route.
- Personnel from the Environmental Health and Safety Programs subsection will initiate a head count from the bi-weekly rosters of plant personnel and will account for personnel.
- The receptionist is to take visitor sign-in sheets to the checkpoint and assist in accounting for visitors.
- Supervisors will be responsible for reporting to accountability personnel the status of employees who are absent as a result of illness, vacation, company business, etc.
- Upon completion, all rosters should be taken to the accountability team in the North Gate Guard House who will, from the rosters, make a master roster. After this master roster is complete, all undeleted badge numbers will be considered unaccountable. This information will be transferred to the emergency coordinator and supervisors.
- A list of personnel involved in the response effort, including off-site assistance, will be compiled by the emergency coordinator.
- The emergency coordinator or his designate will communicate incident information and coordinate response activities with the off-site fire and police departments.
- Entry into an emergency area will be permitted only after the response group has reported to the emergency coordinator, and after the emergency coordinator (or his designate) has cleared the entry.
- All attempts to rescue or find persons unaccounted for will be directed by the command officer from the police/fire departments.
- Site activities will resume only after the emergency coordinator has given an "all clear" notification.

#### 4.0 EVACUATION OF OFF-SITE AREAS

The possibility that areas adjacent to the site may be endangered due to a fire or release is extremely remote. Because of the immediate need for a decision, the emergency coordinator will follow the procedures below.

- The emergency coordinator will notify the Pinellas County Sheriff's Department (587-6200) and the Florida State Highway Patrol (893-2711) of the need to evacuate, the nature of the hazard, and the extent and rate of spread (including direction) of the material.
- The emergency coordinator will direct security to initiate roadblocks and evacuate areas adjacent to the site, until local units can respond.
- The emergency coordinator will maintain communications with local authorities and assist in the coordination of evacuation, emergency response, and casualty control activities.

## 0. REPORTING REQUIREMENTS

As indicated in previous sections, the emergency coordinator is required to report emergency situations during and after the incident. These requirements are identified below.

### 1.0 INCIDENT MITIGATED ON-SITE (Contingency Plan not implemented)

- Report incident to Environmental Health and Safety Programs office verbally at the time of the incident and submit a completed incident report form (Figure 8) no later than 15 days after the incident is controlled.
- Report the incident verbally to local response agencies, as appropriate, for information purposes only.
- File the incident report with Environmental Health and Safety Programs Manager and maintain incident reports in operations file.

### 2.0 INCIDENT REQUIRING OUTSIDE ASSISTANCE (or otherwise implementing the Contingency Plan)

- Potentially or Actually Endangering Human Health or the Environment
- Report incident to local authorities and request immediate emergency support, as needed.
- If a spill or release of a hazardous substance to the environment exceeds reportable quantities as determined from references cited, or if off-site human health or the environment is threatened, report incident verbally to the National Response Center (800/424-8802), or the USEPA Region IV (404/347-4062) immediately.
- If the chemical is an extremely hazardous chemical (40 CFR 355, Appendix A/B), or CERCLA hazardous substance in excess of RQ, then report incident to the State Emergency Response Commission (904-448-1320) and the Local Emergency Planning Committee (911).
- Report the incident to the Environmental Health and Safety Programs office (545-6034) verbally at the time of the incident and submit a completed incident report form after the situation is controlled.
- Medical assistance must be available in the event of a release which migrates off-site to provide medical advice to emergency response agencies regarding the general effected public.

## INCIDENT REPORT FORM

Owner:  
Department of Energy  
P.O. Box 2900  
Largo, FL 34294-2900  
813/541-8943

Operator:  
General Electric  
Neutron Devices Department  
P.O. Box 2908  
Largo, FL 34294-2908  
813/541-8001

Date: \_\_\_\_\_ Time: \_\_\_\_\_

**Location:** \_\_\_\_\_

Type of Incident: \_\_\_\_\_

Type/Quantity of Material(s) Involved:

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**Extent of Injuries:** \_\_\_\_\_

**Assessment of Actual/Potential Hazards to Human Health or the Environment:**

**Estimated Quantity and Disposition of Recovered Material Resulting From the Incident:**

Figure 8. Incident Report Form

- If the incident involves materials listed in 40 CFR 355 an initial notification form (Figure 9) will be completed for call in reporting, and a Follow-up Release Notice will be completed (Figure 10) for follow up notification. These reporting criteria are outlined in Sections A and E of this plan.
- As soon as practicable after a release which requires notification under section 40 CFR 355, a written follow up report(s) will be submitted to update the initial notification.
- Prior to resumption of operations and after cleanup, a verbal report must be made to the state and/or the EPA Region IV Office.
- Within 15 days of an incident requiring implementation of the Contingency Plan, a written incident report must be filed with the State and USEPA Regional Office. The incident report shown in Figure 8 is suitable for this report.

40 CFR 355 Initial Notification

Owner:  
Department of Energy  
P.O. Box 2900  
Largo, FL 34294-2900  
813/541-8943

Operator:  
General Electric Company  
Neutron Devices Department  
P.O. Box 2908  
Largo, FL 34649  
813/541-8001

1) Date: \_\_\_\_\_

2) Location: \_\_\_\_\_

3) Type and Quantity of Material(s) Released:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4) Indicate if the Materials are Extremely Hazardous Substances (See "List of Extremely Hazardous Substances" 40 CFR 355 Appendix A/B).

5) Time and Duration of the release.:

Start Time : Stop Time : Duration :

6) Medium or Media into which the material was released (i.e., water, soil, air, ground, etc.).

7) Any known or expected acute or chronic health risks associated with the emergency and medical advice for exposed individuals.

8) Proper precautions to be taken as a result of the release, including evacuation.

9) Name and Telephone number of person to be contacted for further information

Figure 9. Initial Notification Form (40 CFR 355)

40 CFR 355 Follow Up Release Notice

Owner:  
Department of Energy  
P.O. Box 2900  
Largo, FL 34294-2900  
813/541-8943

Operator:  
General Electric Company  
Neutron Devices Department  
P.O. Box 2908  
Largo, FL 34649  
813/541-8001

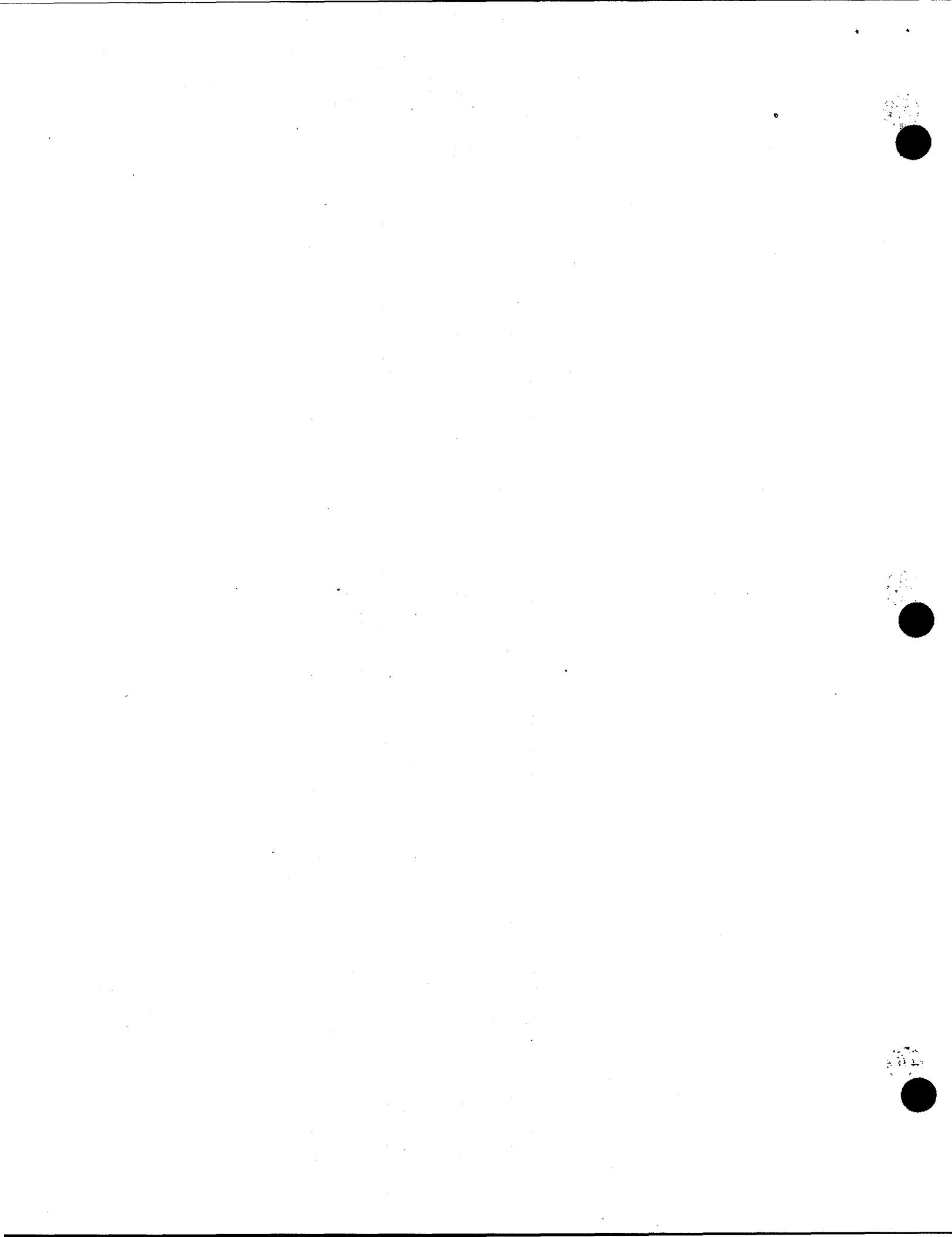
1) Date: \_\_\_\_\_

2) Location: \_\_\_\_\_

3) Actions taken to respond to and contain the release.

4) Any known or expected acute or chronic health risks associated with the emergency and medical advice for exposed individuals.

Figure 10. Follow-Up Release Notice (40 CFR 355)

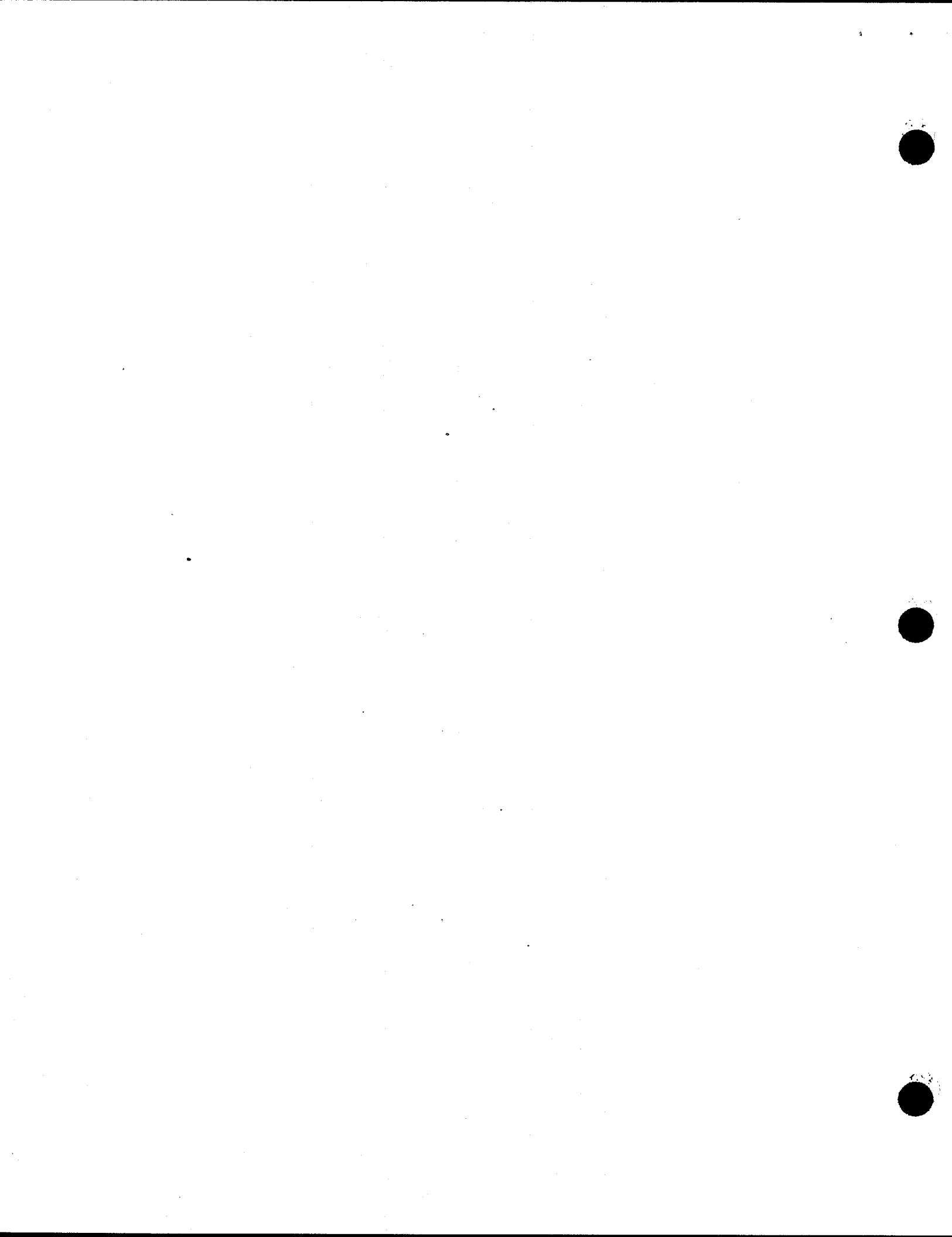


## P. AMENDMENTS TO CONTINGENCY PLAN

The contingency plan will need to be reviewed and amended if the following situations occur:

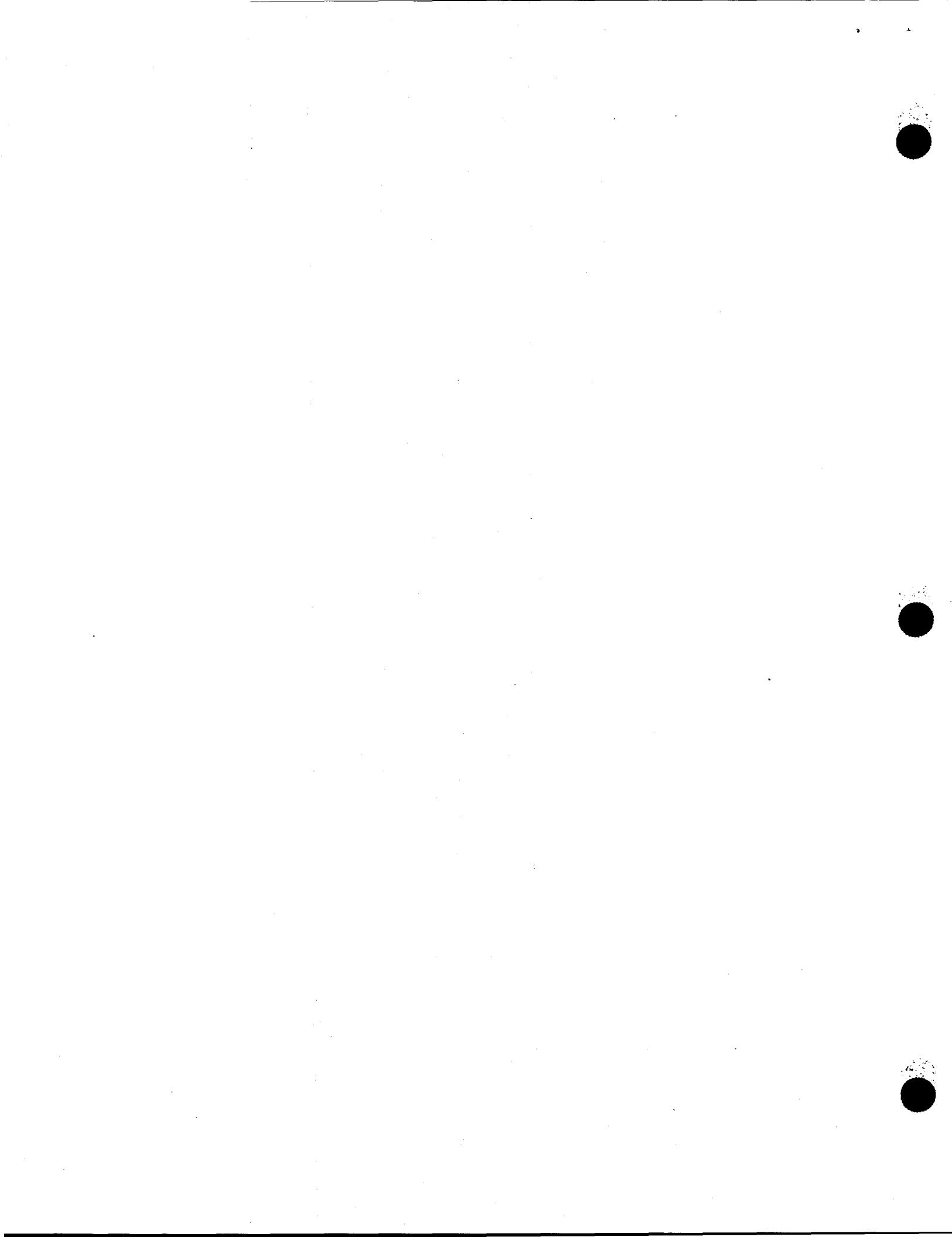
- The plan fails in an emergency.
- The facility permit is revised.
- The facility changes in design, construction, operation, maintenance, or if other circumstances develop that materially increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes in the response necessary in any emergency.
- The list of emergency coordinators changes.
- The list of emergency equipment changes substantially.

Amended contingency plans do not need to be submitted to the EPA, but must be maintained on-site and provided to local authorities.



**APPENDIX A**

**EMERGENCY CONTACTS**



---

CONTROL TEAM PERSONNEL

---

EMERGENCY COORDINATOR (GE)

J. R. Majestic  
10887 Harborside Dr.  
Largo, Florida  
397-4194 (Home)  
Ext. 6034 (Plant)

Alternate No. 1:

C. K. Hall  
15330 Harbor Dr.  
Maderia Beach, FL  
392-3054 (Home)  
Ext. 8273 (Plant)

Alternate No. 2:

D. L. Cusick  
1329 Moreland  
Clearwater, Florida  
531-2994 (Home)  
Ext. 8270 (Plant)

INDUSTRIAL HYGIENIST (GE)

T. Douglas  
300-35 Ave. NE  
St. Petersburg, FL  
823-7748 (Home)  
Ext. 8156 (Plant)

Alternate:

D. L. Slack  
11040 113 Avenue North  
Largo, Florida  
392-4205 (Home)  
Ext. 8711 (Plant)

SPECIALIST, ENVIRONMENTAL  
PROTECTION (GE)

D. V. Gray  
10128 Shady Drive  
Hudson, Florida  
856-2527 (Home)  
Ext. 8710 (Plant)

Alternate:

R. D. Klein, Ph.D.  
11081 60th Street North  
Pinellas Park, FL  
541-2123 (Home)  
Ext. 6094 (Plant)

SPECIALIST, FIRE PROTECTION (GE)

D. E. Magness  
10821 Hammock Drive  
Largo, Florida  
593-3167 (Home)  
Ext. 8577 (Plant)

Alternate:

L. L. Bower  
9275 122 Ave. North  
Largo, Florida  
586-3315 (Home)  
Ext. 8578 (Plant)

Senior Fire Brigade Member on  
duty at the Plant

SAFETY & OCCUPATIONAL HEALTH MANAGER  
(DOE/PAO)

David S. Ingle  
818 Jacaranda Drive  
Oldsmar, FL  
854-1081 (Home)  
Ext. 8943 (Plant)

Alternate:

Collette Broussard  
930 Orange View Drive  
Largo, FL  
585-9823 (Home)  
Ext. 8086 (Plant)

MANAGER, PLANT FACILITIES (GE)

C. K. Hall  
15330 Harbor Dr.  
Maderia Beach, FL  
392-3054 (Home)  
Ext. 8273 (Plant)

Alternate:

D. L. Cusick  
1329 Moreland  
Clearwater, Florida  
531-2994 (Home)  
Ext. 8270 (Plant)

WASTE MANAGEMENT (GE)

Gary Smith  
500 110 Avenue North, Apt. 708  
St. Petersburg, FL  
577-4689 (Home)  
Ext. 8839 (Plant)

**HEALTH PHYSICIST (GE)**

Bob Burkhart  
6489 109th Terrace  
Pinellas Park, FL  
545-2195 (Home)  
Ext. 6316 (Plant)

**Alternate**

Adam Weaver  
2317 Glenmoor Dr. No.  
Clearwater, FL  
535-3896 (Home)  
Ext. 8712 (Plant)

**ELECTRIC SYSTEMS (GE)**

John Thayer  
1927 Sever Drive  
Clearwater, Florida  
441-3414 (Home)  
Ext. 8205 (Plant)

**MEDICAL SERVICES (GE)**

A. J. Barker, M.D.  
5300 Joes Creek Drive  
St. Petersburg, Florida  
527-4277 (Home)

---

**LOCAL AID AGENCIES**

---

Pinellas County Sheriff's Department 587-6200

Seminole Fire Department 441-4884  
or 911

Pinellas Park Fire Department 544-8831  
or 911

Pinellas County Emergency Medical Service 441-4884  
or 911

Emergency Planning Committee 911

---

**PUBLIC UTILITIES**

---

Florida Power Corporation 895-8711

Pinellas County Sewer System Industrial Program Manager	462-4101 586-8969 (beeper*)
Pinellas County Water System	462-4844 462-4841 (after hours)

---

### ENVIRONMENTAL CONTROL AGENCIES

---

#### PINELLAS COUNTY

Environmental Management	530-6522
Health Department	823-0401
Poison Control Center	800/282-3171
HazMat Team	911

#### STATE OF FLORIDA

Department of Environmental Regulation S.W. District Tampa	623-5561 (Tampa Number)
Emergency Response Team	904/488-0190
Southwest Florida Water Management District	985-7481 (Tampa Number)
Emergency Response Commission	1-904/488-1320

#### UNITED STATES EPA REGION IV

Information	800/241-1754
Environmental Emergency	404/347-4062
National Response Center	800/424-8802

---

### CLEAN-UP CONTRACTORS

---

GSX Services, Inc.	573-1405
Enviropact	573-9663 (Normal Working Hrs.)

---

\*See instructions on page 8 of this document.

**DISTRIBUTION**

**DOE**

D. H. Martin, AL  
E. E. Patenaude, PAO (5)  
OSTI - Oak Ridge (2)

**GEND**

J. S. Caven  
D. L. Cusick  
T. A. Douglas  
R. E. Gmitter  
D. V. Gray  
C. K. Hall  
R. D. Klein  
J. Majestic  
G. C. Smith  
Building 1040

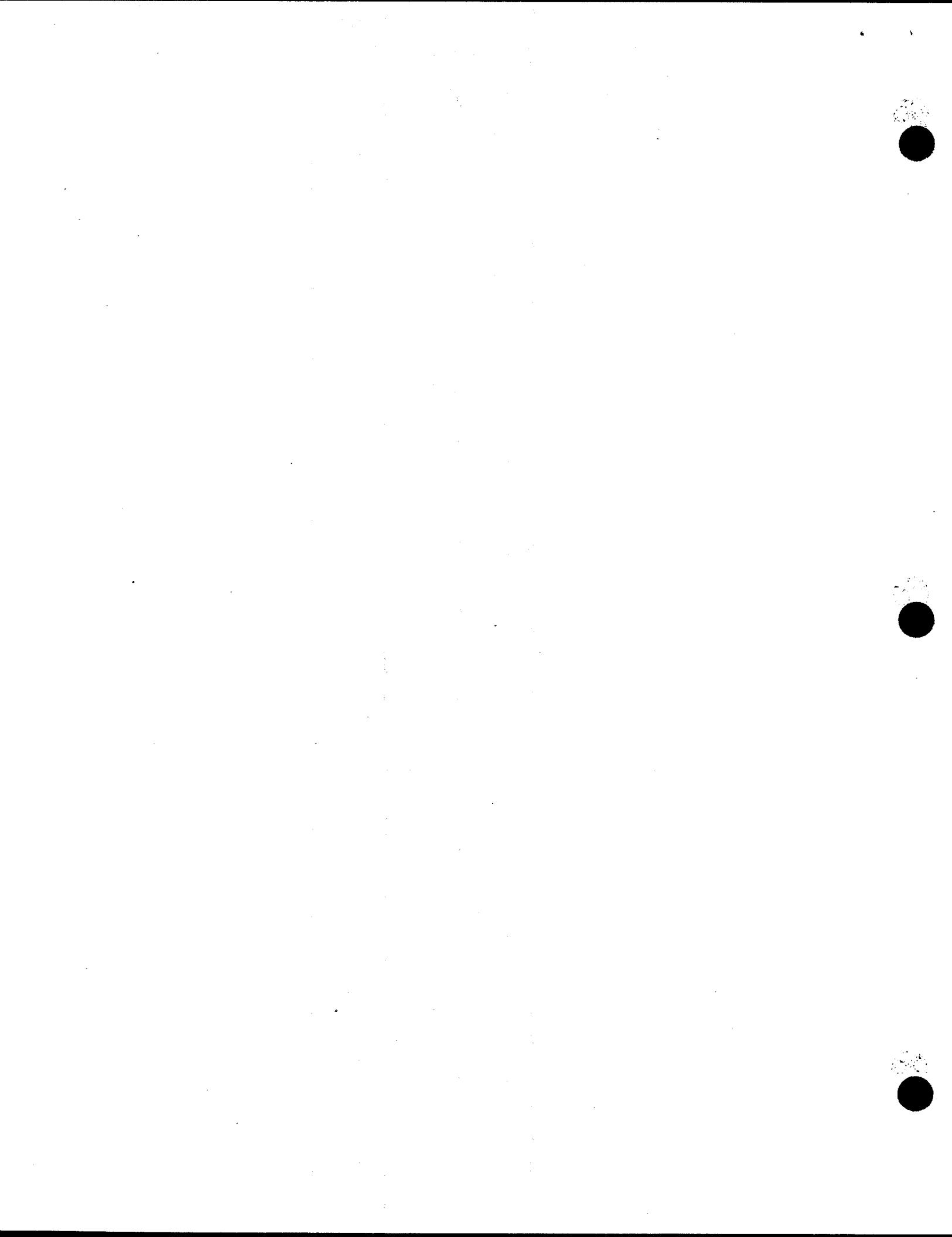
Technical Information Center (2)  
Technical Publications  
(1 + Reproduction Masters)

**Outside Emergency Services**

Pinellas County Sheriff's Department  
Seminole Fire Department  
Pinellas Park Fire Department  
Pinellas County Emergency Medical Services  
GSX Services, Inc.  
Enviropact, Incorporated  
Pinellas County Emergency Management Administration  
Florida Department of Environmental Regulations (3)  
Part B Application (7)

APPENDIX B

CHEMICAL LABELING SYSTEM



# DIAMOND LABEL CODE LEGEND

\*\*\*FOR ADDITIONAL COPIES CONTACT WASTE MGMT\*\*\*

## FIRE

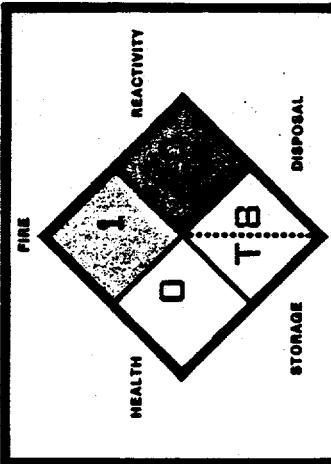
4	Extremely flammable	Flash point	below 73°F
3	Highly flammable	Flash point	73°F - 100°F
2	Moderately flammable	Flash point	101°F - 200°F
1	Slightly flammable	Flash point	above 200°F
0	Non-Combustible	Flash point	above 1500°F

## HEALTH

4	Extremely hazardous	
3	Highly hazardous	
2	Moderately hazardous	
1	Slightly hazardous or practically non-hazardous	
0	Relatively harmless	

B-3

## SAMPLE



## REACTIVITY

4	Extremely reactive	4	Extremely reactive
3	Highly reactive	3	Highly reactive
2	Moderately reactive	2	Moderately reactive
1	Slightly reactive	1	Slightly reactive
0	Non-Reactive	0	Non-Reactive

## STORAGE

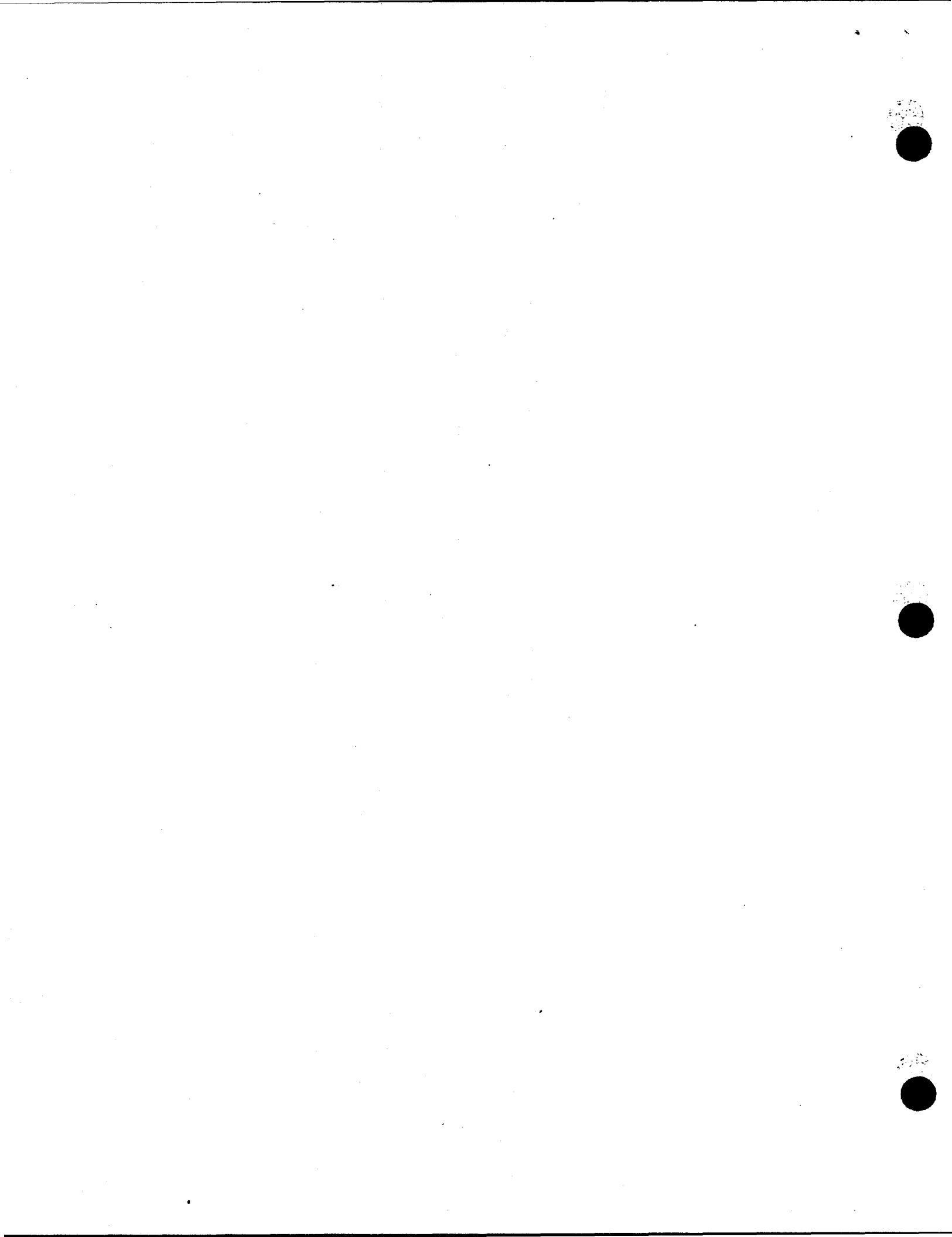
A	Acids	A	Acids
B	Alkalines (Bases)	B	Alkalines (Bases)
F	Flammables (includes combustibles and oils)	F	Flammables (includes combustibles and oils)
H	Heat Paper/Powder Room	H	Heat Paper/Powder Room
O	Oxidizers	O	Oxidizers
R	Reactive Metal	R	Reactive Metal
T	Toxics	T	Toxics

## DISPOSAL

1.	Flammable Liquids	6.	Corrosives	c.	Mercury and Compounds
a.	Aerosol Cans	7.	Toxic Liquids	d.	Chromium Compounds
2.	Flammable Solids	a.	Cyanides	g.	Reactive Compounds
3..	Petroleum-Based Oils	b.	Arsenics	a.	Metals
4.	Halogenated Hydrocarbons	b.	Toxic Solids	b.	Peroxides
a.	Firsons	a.	Cyanides	10.	Chemical Drain
b.	Methylene Chloride	b.	Arsenics	11.	Non-Regulated Solid
5.	Oxidizers				

APPENDIX C

COORDINATION AGREEMENT WITH SEMINOLE FIRE DEPARTMENT



AGREEMENT FOR FIRE PROTECTION

THIS AGREEMENT entered into this 1st day of July, 1987, between the SEMINOLE VOLUNTEER FIRE DEPARTMENT, INC., a Florida Corporation, hereinafter referred to as "Seminole Fire Department," and the GENERAL ELECTRIC COMPANY, Pinellas Plant, hereinafter referred to as "General Electric," for the purpose of furnishing equipment and personnel of the Seminole Volunteer Fire Department to the properties of the Pinellas Plant within the boundaries hereby described:

The 94.6 acre site owned by the Federal Government located on the northwest corner of the intersection of Bryan Dairy Road and Belcher Road. NOW, THEREFORE, in consideration of the mutual promises set forth herein, the parties hereto covenant and agree as follows:

For a period of three (3) years commencing on the date of this Agreement, the Seminole Fire Department shall furnish the following fire protection to General Electric:

FIRE PROTECTION SERVICES

- A. Upon request to a representative of the Seminole Fire Department by a duly authorized representative of General Electric, fire-fighting equipment and personnel of the Seminole Fire Department, as described in Paragraph B.1 of this Agreement, will be dispatched to any point within the boundaries of the Pinellas Plant, as described in Page One of the Agreement. Names of General Electric personnel authorized to request equipment shall be furnished by General Electric to the Seminole Fire Department and shall be kept current by General Electric. The Seminole Fire Department shall not respond unless requested by such authorized personnel.

B. The Seminole Fire Department will make available for the purposes of this Agreement the following equipment and personnel:

- 1) Two (2) 1000 GPM or greater pumbers and one (1) platform truck.
- 2) Adequate fire-fighting personnel

C. Any dispatch of equipment and personnel by the Seminole Fire Department pursuant to this Agreement is subject to the following conditions and terms:

- 1) Any request for aid hereunder shall specify the locations to which the equipment and personnel are to be dispatched. Any additional manpower or apparatus required shall be furnished either by the Seminole Fire Department or by the County Mutual Aid System at the discretion of the Seminole Fire Department Officer in Charge.
- 2) The equipment and personnel of the Seminole Fire Department shall report to the duly designated representatives of General Electric at the location to which the equipment is dispatched and all such equipment shall be manned, operated and supervised by the personnel of the Seminole Fire Department.
- 3) The Seminole Fire Department's equipment and personnel shall be released by the duly designated representative of General Electric when the services of the Seminole Fire Department are no longer required.

D. For the fire protection services provided by the Seminole Fire Department, General Electric shall pay to the Seminole Fire Department the amount of Nine Thousand Dollars (\$9000). This amount shall be paid in three (3) equal installments of Three Thousand Dollars (\$3000) each, to be paid in advance on July 1, 1987, July 1, 1988, and July 1, 1989.

GENERAL

- A. This Agreement may be terminated by either party upon sixty (60) days written notice to the other party. In the event of such termination by General Electric for its own convenience, there shall be no refund of the prepaid annual charge. In the event of such termination by General Electric because of the default of the Seminole Fire Department, or in the event of such termination by Seminole Fire Department, the Seminole Fire Department shall refund to General Electric a pro-rata portion of the prepaid annual charges.
- B. All equipment and personnel used by the Seminole Fire Department in carrying out this Agreement will at all times remain the property and personnel of the Seminole Fire Department and under the supervision of the Seminole Fire Department and the duly authorized representative of the Seminole Fire Department shall have the responsibility and right to employ and direct such equipment and personnel as may be necessary to avoid undue exposure to hazard or danger of such equipment or personnel.
- C. Due to the classified nature of the Pinellas Plant, the United States Department of Energy requires certain security provisions as outlined in the attached supplement (Form FC-258 (10/77), "Supplemental Terms & Conditions Applicable to Contracts Containing Classified Information and/or Material") covering personnel other than employees who may enter the Plant or have access to classified material.

D. This Agreement shall in no event confer upon any person, property owner or any municipality the right of damages against the Seminole Fire Department for operation or failure to operate hereunder in accordance with the terms of this Agreement. The foregoing shall not limit General Electric's right to a pro-rata refund of the prepaid annual charges as provided in Paragraph (4) of this Agreement.

E. The terms and provisions of this Agreement shall inure to and be binding upon the parties hereto, their successors and assignees.

Witness:

SEMINOLE VOLUNTEER FIRE DEPARTMENT

William P. Jamison

James R. McConnell

FIRE CHIEF

Witness:

GENERAL ELECTRIC COMPANY

W. L. Green

R.C. Arlington

GENERAL MANAGER

NEUTRON DEVICES DEPARTMENT

# GENERAL ELECTRIC

NEUTRON DEVICES DEPARTMENT  
GENERAL ELECTRIC COMPANY • P.O. BOX 11508 • ST. PETERSBURG, FLORIDA 33733 • (813) 541-8001

## SUPPLEMENTAL TERMS & CONDITIONS APPLICABLE TO CONTRACTS CONTAINING CLASSIFIED INFORMATION AND/OR MATERIAL

The following provisions apply to this Contract and are in addition to the Terms and Conditions as delineated in Form FC-1577 or FC-1937.

### SECURITY

(a) Seller's Duty to Safeguard Restricted Data, Formerly Restricted Data, and Other Classified Information

The Seller shall, in accordance with the United States Department of Energy (DOE) security regulations and requirements, be responsible for safeguarding Restricted Data, Formerly Restricted Data and other classified information and protecting against sabotage, espionage, loss and theft, the classified documents and material in the Seller's possession in connection with the performance of work under this Contract. Except as otherwise expressly provided in this Contract, the Seller shall, upon completion or termination of this Contract, transmit to the DOE any classified matter in the possession of the Seller or any person under the Seller's control in connection with the performance of this Contract. If retention by the Seller of any classified matter is required after the completion or termination of the contract and such retention is approved by the Area Manager, Pinellas Area Office, DOE, the Seller will complete a certificate of possession to be furnished to the DOE specifying the classified matter to be retained. The certification shall identify the items and types or categories of matter retained, the conditions governing the retention of the matter and the period of retention, if known. If the retention is approved by the Area Manager, the security provisions of the contract will continue to be applicable to the matter retained.

(b) Regulations

The Seller agrees to conform to all security regulations and requirements of the DOE.

(c) Definition of Restricted Data

The term, "Restricted Data," as used in this article, means all data concerning (1) design, manufacture or utilization of atomic weapons; (2) the production of special nuclear material; or (3) the use of special nuclear material in the production of energy, but shall not include data declassified or removed from the Restricted Data category pursuant to Section 142 of the Atomic Energy Act of 1954.

(d) Definition of Formerly Restricted Data

The term, "Formerly Restricted Data," as used in this article, means all data removed from the Restricted Data category under Section 142 d. of the Atomic Energy Act of 1954, as amended.

(e) Security Clearance of Personnel

The Seller shall not permit any individual to have access to Restricted Data, Formerly Restricted Data, or other classified information, except in accordance with the Atomic Energy Act of 1954, as amended, and the DOE regulations or requirements applicable to the particular type or category of classified information to which access is required.

(f) Criminal Liability

It is understood that disclosure of Restricted Data, Formerly Restricted Data, or other classified information relating to the work or services contracted hereunder to any person not entitled to receive it, or failure to safeguard any Restricted Data, Formerly Restricted Data, or any other classified matter that may come to the Seller or any person under the Seller's control in connection with work under this Contract, may subject the Seller, its agents, employees, or subcontractors to criminal liability under the laws of the United States. (See the Atomic Energy Act of 1954, as amended, 42 U.S.C. 2011; 18 U.S.C. Sections 793 and 794; and Executive Order 11652.)

(g) Subcontracts

Except as otherwise authorized in writing by the Area Manager, the Seller shall insert provisions similar to the foregoing in all subcontracts under this Contract.

NOTE A: Except as provided in NOTE A to DOE-PR 9-7.004-22, this article is required in contracts entered into under Sections 31 or 41 of the Atomic Energy Act of 1954, as amended, and in other contracts, and subcontracts, the performance of which involves or is likely to involve Restricted Data, Formerly Restricted Data or other classified information.

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### Outside Emergency Services

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Pinellas Park Fire Department  
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