

We do not have a chemical spill procedure/policy in place. Does anyone have a policy they're willing to share?

There are a number of pattern documents for the development of a site specific chemical spill policy, such as the fairly extensive one provided by Advanced Chemical Safety located at <http://www.chemical-safety.com/documents/PREPLAN.htm>.

TriMedia routinely assists our clients with the preparation of site specific plans for spills, emergency response and safety. We would be glad to offer our thoughts to you at no cost, when we have additional specific information regarding your facility and the chemical hazards present.

We're available to help you through the process. TriMedia Environmental and Engineering Services, LLC

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Editor's Note: the Contingency Plan and flow chart on the next three pages were shared by RBP Chemical Technology, West Allis, WI. RBP invites GLGA members to contact them with any questions.

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Contingency Plan

D. Emergency Response Procedures

1. Notification

- a.) Any employee discovering a fire or hazardous substance release that is not readily controllable with equipment and materials at hand, must activate the ADT alarm system, dial 9 (to get an outside line) then 911 and ask for appropriate emergency response, notify the rest of the plant of the exact nature and extent of the problem over the PA system and contact the Emergency Coordinator. Use PAGE button on Panasonic or *3301 if on another type of phone.
 - b.) All employees hearing the alarm and nothing contrary in the subsequent announcement, must close down and secure their equipment and evacuate the building, reassembling in south parking lot of the building across from RBP Chemical Technology, Inc. on 118th street.. The Emergency Coordinator or his deputy will check with each supervisor to make sure all employees at work that day are out of the building.
 - c.) The Emergency Coordinator will assess the situation and notify the appropriate parties.
 - d.) If there is a spill or other release of any hazardous substance which threatens the health or safety of the surrounding population or may damage the environment, the Emergency Coordinator will notify the Local Emergency Planning Committee at 414-278-4709 and the West Allis Fire Department at 414-302-8000.
 - e.) If the spill involves a reportable quantity of an Extremely Hazardous Substance or a CERCLA substance, the Emergency Coordinator will notify the Division of Emergency Government at 800-943-0003 and the National Response Center at 800-424-8802 and report the incident. The report will include the following:
 1. Name and telephone number of reporter.
 2. Name and address of this facility.
 3. Time and type of incident.
 4. Identification and quantity of materials involved.
 5. The extent of injuries.
 6. The possible hazards to the environment and human health outside facility.
2. The Wisconsin State spill law requires that all non-permitted releases of hazardous substances must be reported to 800-943-0003. (Hazardous substance in this case is defined as anything that may cause harm to an individual or the environment.)

Contingency Plan

D. Emergency Response Procedures (cont'd)

3. Containment and Control

- a.) The Emergency Coordinator will take all necessary measures to contain the spill within the building and environs of RBP Chemical Technology, Inc. with the assistance of emergency personnel assigned by the various parties contacted.
- b.) In case of a spill, absorbent material will be placed on the spill. The spill will be prevented from going down a drain or exiting our building until such time as it can be collected in a drum or tank, or completely absorbed.
- c.) In the case of a major uncontrollable runoff from the plant; (e.g. a major fire where the sprinkler system comes on), any water in the parking lots or ditches should be pumped to the sanitary outfalls instead of allowed to enter the storm sewers.
- d.) The Emergency Coordinator will employ one or more of the following measures to ensure the safety and health of nearby people and maximum protection of the environment; use of appropriate protection equipment dismissal of all non-essential personnel during an emergency; and maintenance of the closest possible contact with the West Allis Fire Department during any emergency situation in order to keep the city government apprised of the situation.

4. Follow-up Actions

- a.) Following containment and control of the emergency, the Emergency Coordinator will provide for collection, treatment, and disposal of any waste and any contaminated soil, water, or other materials by the emergency crew or outside contractor, as appropriate and in accordance with current laws and regulations.
- b.) The Emergency Coordinator will ensure that all emergency equipment is restored to full operational status by the emergency crew or outside contractor, as appropriate and in accordance with current laws and regulations.
- c.) The Emergency Coordinator, assisted by two other qualified persons, will investigate the cause of the emergency and will take steps to prevent a recurrence of such or similar incidents.
- d.) The Emergency Coordinator will make sure the cause of the emergency has been eliminated and that cleanup and restoration have progressed at least to the point of not jeopardizing the health and safety of the employees, and that EPA, state and local authorities have been notified before permitting resumption of the operations affected by the emergency.

Contingency Plan

E. Emergency Equipment

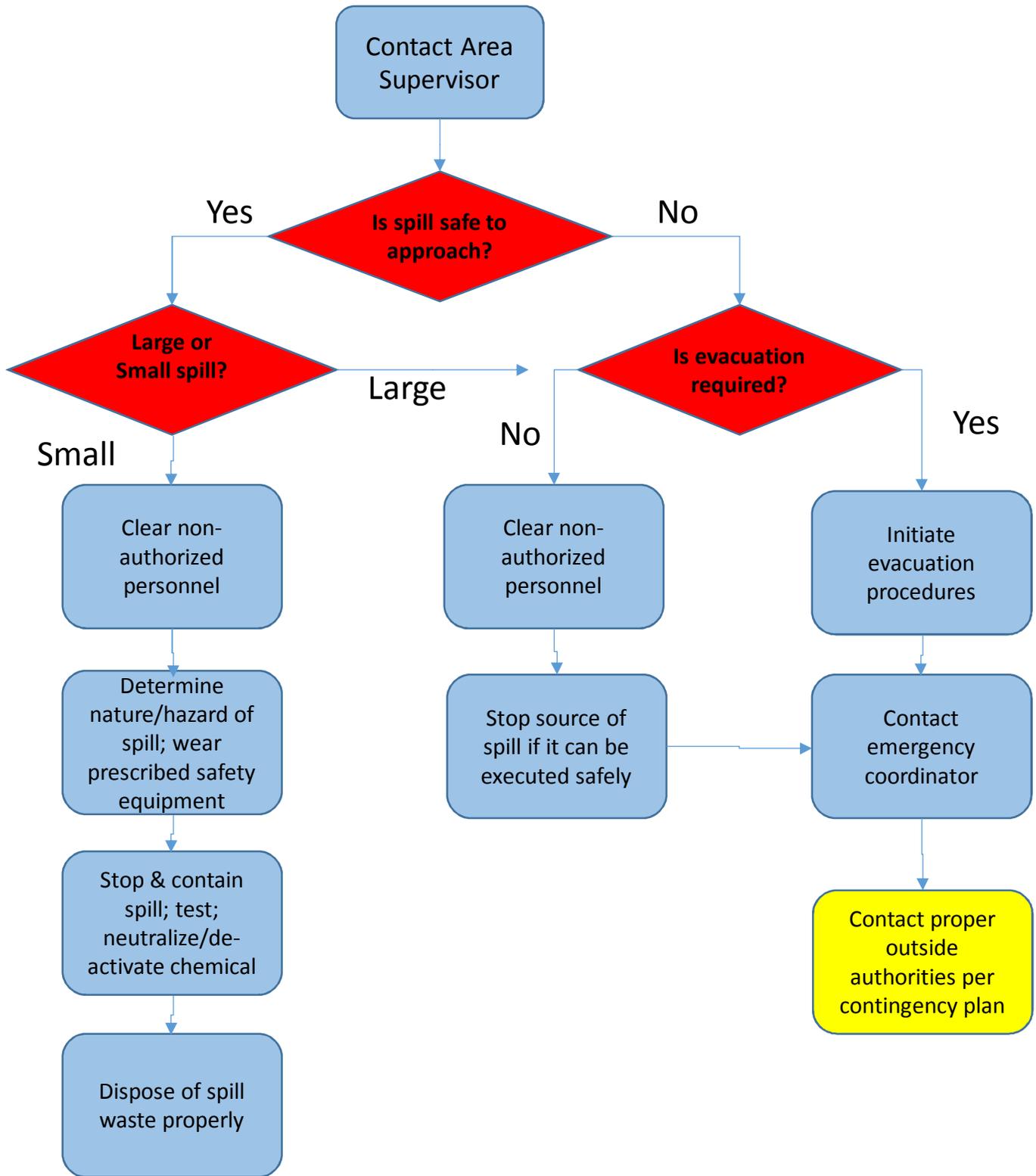
1. Entire factory and warehouse areas is sprinkled with water flow and valve positions monitored by ADT.
2. Entire building is wired with a phone system. Each instrument is capable of accessing the public address system in addition to making inside and outside calls.
3. Strategically located throughout the building are more than 25 fire extinguishers. Every area of the company has at least one fire extinguisher.
4. Five portable pumps are available for cleanup operation: a stainless steel air driven drum pump; a magnetically coupled electric centrifugal pump; a magnetically coupled air driven centrifugal pump; and two air driven double diaphragm pumps.
5. Many 330 gallon polyethylene or stainless steel IBC's are available and immediately portable to any place in the plant.
6. Supplies of plastic and steel overpack drums are on hand; standard polyethylene and steel drums are available to repackaging leaking drums or spills.
7. 3750 gallons of capacity in our settling tanks available to contain spills if the tanks are pumped out first by SET Environmental, Inc. on an emergency basis.
8. Eyewash and drench showers for emergency washing of affected personnel. Outside Acid Room entrance, Main Lab, QC Lab, Cowles area, Chem Room #2-beside MEA tank.
9. Personal protective equipment including safety glasses, goggles, face masks, boots, vinyl jackets and pants, acid gas and organic vapor cartridges respirators and gloves.
10. Wetvac and floor scrubber available for final cleanup.
11. Absorbent materials, brooms, mops floor squeegees and shovels.

Four (4) Fire Alarm Locations:

- South exit west of Maintenance
- North dock door entrance
- North East yard entrance
- Main entrance

EMERGENCY SPILL FLOW CHART

(refer to Contingency Plan for safety, proper treatment, and disposal methods)



DISASTER PLANNING - Chemical Spill

Prevention:

1. Individuals should be familiar with the properties and hazards of the materials with which they work with. Each chemical user should consult the Material Safety Data Sheet (MSDS/SDS) for the specific chemical that he/she plans to work with and consider response options in case of a spill or release beforehand.
2. Before beginning work with chemicals, one should be sure that he or she has adequate training for cleaning up small spills, and that the appropriate types and amounts of spill clean-up materials and personal protective equipment are immediately available.
3. A description of the facility, including the owner's name and address, the nature of the facility activity, and the general types of chemicals used in the facility.
4. A site plan showing the locations of chemical storage areas, storm drains, tributary drainage areas with drainage arrows, all surface water bodies on or next to the site, and any devices to stop spills from leaving the site (i.e., collection basins). Spill prevention devices should also have a description written on the map.
5. All chemicals must be stored in proper storage containers.
6. Inspections and maintenance.
7. Test equipment.
8. Make sure Fire Department has an updated copy of the Hazardous Waste Contingency Plan and any other information they may require, i.e., map of plant, type of chemicals, location of chemicals, etc.

Emergency Equipment - The plant has the following emergency equipment:

1. Each working area is equipped with a fire extinguisher – Check annually.
2. Automatic sprinkler system with alarm – Check annually.
3. Supply of absorbent materials – Check daily.
4. Eye fountain or eye wash – Check annually.
5. Three fire hydrants are located on the plant property.

6. Immediately adjacent to the main hazardous waste area is a spill kit which contains spill supplies, absorbents, and personal protective equipment – Check bi-weekly.
7. First aid cabinets are located in the plant – Check bi-weekly.

Coordination Agreements – add name, address, and phone numbers

Emergency Contractor for Spill Clean Ups – Name, Address, Phone Number
Fire Department
Police Department
Hospital Clinic

Implementation of the Contingency Plan

1. The Contingency plan will be implemented if an incident might threaten human health or the environment. The emergency coordinator has full authority to make this decision. Depending upon the degree of seriousness, the following potential emergencies might call for the implementation of the contingency plan.

- Fire and/or explosion.
- Release of hazardous waste, which could threaten human health or the environment.
- Release of CERCLA Hazardous Substance or SARA Extremely Hazardous Substance, which exceeds the listed reportable quantity (RQ).
- Spillage of petroleum products which may cause a sheen on waterway or a detectable odor (e.g. in soil).

Response:

Notification:

1. Any employee discovering a fire or hazardous release that is not readily controllable with equipment and material at hand must activate the emergency alarm system and contact the emergency coordinator and the Fire Department.
2. All employees hearing the alarm must close down, secure their equipment and proceed to the nearest clear exit and meet at their designated area outside the building.
3. The emergency coordinator or one of the deputies will conduct a roll call for all employees scheduled at the time of evacuation to determine whether any employees are trapped in the affected area.

4. The emergency coordinator will assess the situation and notify the appropriate parties.

Emergency Telephone Numbers (add name and phone numbers):

Primary Coordinator

Back Up Coordinator

Fire Department 911

Police Department 911

Hospital

Clinic

President -

VP Manufacturing -

Emergency Contractor - For Spill Clean Ups:

Containment and Control

1. The emergency coordinator will take all necessary measures to contain the hazard within the depot and to prevent its spread to other nearby facilities, with the assistance of emergency personnel assigned by the various parties contacted.

2. In case of a spill, absorbent material will be placed on the spill.

3. The emergency coordinator will take the following steps in the event of fire, explosion, or discharge of hazardous wastes as required per NR 665.0056:

- a) Identify the character, source and extent of the discharged hazardous waste materials [(NR 665.0056(2))]

- b) Notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003) if the incident threatens human health or the environment outside the facility [(NR 665.0056(4)(a))].

- c) Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operating [(NR 665.0056(6))].

- d) Ensure wastes that are incompatible with the released material are not treated, stored or disposed until the cleanup is completed [(MR 665.0056(8)(a))].

- e) Notify the WDNR as well as other appropriate state and local authorities, before resuming operations [(NR 665.0056(9))].

- f) Submit an incident report to the WDNR within 15 days that indicates the proper criteria [(NR 665.0056(10))].

4. The emergency coordinator will employ one or more of the following measures to ensure maximum protection of the safety and health of employees and nearby residents. Use of appropriate personal protective equipment, dismissal of all nonessential personnel, and advice the Mayor (or the Mayor's designee) on the desirability of evacuation certain sections of town.

Required Reports

1. The primary or back-up emergency coordinator will notify the County Office of Emergency Management and appropriate local authorities that the follow-up actions have been implemented.
2. The primary or back-up emergency coordinator will note the time, date, and details of any incident that requires implementation of the contingency plan and will submit a written report.
3. The emergency coordinator will revise this contingency plan in accordance with the experience acquired during each emergency situation and will send copies of the revisions to each holder of the original plan.

Recovery:

1. Following containment and control of the emergency, the emergency coordinator will provide for collection, treatment, and disposal of the waste, contaminated soil, water, or other materials by the plant or outside contractor as appropriate.
2. The emergency coordinator will ensure that all emergency equipment is restored to full operational status by the plant or outside contractor.
3. The emergency coordinator, assisted by two other qualified persons, will investigate the cause of the emergency and will take steps to prevent a recurrence of such of similar incidents.
4. The emergency coordinator will make sure that the cause of the emergency has been eliminated and that cleanup and restoration have progressed at least to the point of not jeopardizing the health and safety of the employees and that state and local authorities have been notified, before permitting resumption of the operations affected by the emergency.

Evacuation Plan

1. Facility personnel will be evacuated if the emergency Coordinator decides that their personal safety is in danger.
 2. If evacuation is necessary, the alarm system will be activated. Evacuation will take place by using the nearest clear exit and meeting at the designated area.
 3. The designated evacuation meeting area is in the front entry parking lot of the facility.
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