ATTACHMENT C

OPERATING PLAN

GSS Transfer, LLC.

A division of Gresham Sanitary Service, Inc.



2131 NW Birdsdale Ave.
Gresham OR. 97030

Revised September 12th, 2016

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SECTION I is an introductory section. It describes the function and use of the Plan, and provides background information on the relationship of the facility to the overall Solid Waste transfer.

SECTION II describes general facility operating requirements and procedures, for functions not directly related to Solid Waste transfer.

SECTION III contains a detailed description of each facility component related to Solid Waste transfer. Specific operation and control features are also described.

SECTION IV deals with equipment, facility maintenance, and inspections.

SECTION V describes the duties of personnel working at the facility. Work schedules, job training and a listing of the staffing structure are also discussed.

SECTION VI covers procedures to be followed under general contingency conditions of work stoppage, inclement weather, and equipment failure.

SECTION VII covers procedures to be followed under emergency contingency conditions of fire, explosion, and suspicious/hazardous waste spills.

SECTION VIII describes the system of maintaining operation and equipment records and the reporting system that provides this information to GSS Transfer's Management.

SECTION IX discusses safety policy and procedures to be followed at the facility.

A.2 OVERVIEW OF FACILITY FUNCTION

GSS Transfer, LLC. is a registered company in the State of Oregon. GSS Transfer includes the transfer building, scale house, office, equipment, paving, and landscaping. GSS Transfer, LLC is authorized by the Oregon Department of Environmental Quality (DEQ) to accept residential, commercial, and industrial solid waste. No other wastes are accepted without written approval of Metro and/or the DEQ. GSS Transfer is not permitted to accept prohibited or hazardous wastes, except for small amounts that may be incidental to the materials received and within state and federal parameters.

The principal function of the GSS Transfer facility is to receive and load Solid Waste into trailers for transfer to METRO and DEQ approved Transfer Stations or Landfills.

In the event any hazardous waste is discovered and the generator or hauler cannot be identified, the material will be removed from the facility by a licensed contractor and shipped directly to an authorized storage or disposal site. If the generator is identified, he or she will have the option of removing the material. If he or she does not choose to, or cannot remove the waste, GSS Transfer shall contract such removal at the expense of the generator and/or hauler.

Public drop off is offered for Oregon E-Cycles materials and source separated cardboard and scrap metal. Public Solid Waste is not accepted. Our Shred NW division accepts documents and media for destruction in a shred plant, Medical Waste tubs and sharps containers are accepted on a drop off basis under Gresham Sanitary's Medical Waste operations. No other materials are accepted from the public. The Attachment A Site Plan details the drop off area location and overall layout of the facility.

D. STORM AND SANITARY DISPOSAL

The facility produces three different non-process wastewater streams which are handled as follows:

1. SANITARY SEWER WATER

Sanitary sewer water which includes drainage from toilets and washbasins is discharged to the City of Gresham sanitary sewer system.

2. STORMWATER

Storm Drains from on-site pavement and roof areas. Surface water and ground water is protected by the use of separate drainage systems and the use of oil water separators. Stormwater runoff is controlled through a series of catch basins with filter liners and oil/water separators before it discharges into the Underground Injection System (UIC). After passing through the UIC system, the stormwater flows into the natural on-site drainage way. Facility grading prevents any surface stormwater from flowing off-site. This system has been approved by DEQ under Permit #13410 and all annual testing requirements have been met. The catch basins and oil/water separator are inspected and maintained on a routine basis.

3. WASTEWATER

Wastewater or solid waste leachate. The wastewater or solid waste leachate from the tipping floor and load out pit is first directed through an oil/water separator. It then flows to a weir system to remove any solids and sediment. The remaining liquid is collected and pumped into a holding tank. The contents of the wastewater holding tank are either collected by a licensed liquid waste processing company or sprayed on the solid waste hauled to landfill. The dry portions of the solid waste absorb the liquid.

The tipping floor and load out pit wastewater system is fully separated from stormwater. All equipment cleaning and wash-down is performed in our covered truck wash building. Wastewater from the truck wash building is directed through a weir system to remove solids and then into a coalescent vault that utilizes corrugated polypropylene plates and specific gravity by-pass chambers to separate any oil or grease. The output is directed into the sanitary sewer. The contents of the oil separation chamber are collected by a licensed liquid waste processing company. The truck wash is covered and the wastewater system is fully separated from stormwater

All Solid Waste is managed in the transfer building or stored in containers to prevent solid waste from coming in contact with stormwater.

Best Management Practices (BMPs) are in place to reduce pollutants. Our BMPs include frequent sweeping of impervious surfaces with our sweeper truck, spill prevention, and spill cleanup training, frequent storm drain monitoring to determine cleaning requirements and frequent pickup of litter or trash.

E. NUISANCE CONTROL

GSS Transfer has contracted with a pest control specialist to inspect the facility and place vector control devices throughout the facility, on a monthly basis. If, in the course of normal operations, insects, birds, rodents, or other animals become a nuisance or health and safety hazard, the facility will increase the means of vector control, and take such action as required to minimize such nuisances. Occurrences of pests are

SECTION III -WASTE HANDLING OPERATIONS

A. GENERAL

This section describes the operation and control of each component in the facility that is directly related to solid waste handling. More detailed information about specific pieces of equipment can be found in the appropriate manufacturer's manual. Maintenance schedules and procedures are briefly addressed in Section IV. Detailed maintenance information is contained in the individual equipment operation and maintenance manual(s).

B. THE WASTE STREAM

The following two categories of waste are expected to arrive at the facility:

- 1. Putrescible ("wet") Solid Waste.
- 2. Source separated materials such as glass, yard debris, scrap metal, and bulky waste from GSS route operations are consolidated in drop boxes for direct hauling to markets.

B.1 ACCEPTABLE WASTE

The Transfer Station currently accepts wet solid waste from GSS trucks only. Solid waste from other haulers may be accepted in the future. No special waste or public waste is accepted. Since no material recovery occurs on site, loads containing only dry waste or construction waste are not accepted.

"Solid Waste" means all useless or discarded putrescible and non-putrescible materials, including, but not limited to, garbage, rubbish, refuse, ashes, paper and cardboard, useless or discarded commercial and industrial materials, discarded or abandoned vehicles parts, manure, vegetable or animal solid and semisolid materials, and dead animals.

B.2 UNACCEPTABLE WASTE

Unacceptable waste means:

- 1. Hazardous waste as defined in ORS 466.005;
- 2. Radioactive waste as defined in ORS 469.300;
- 3. Chemicals, liquids, batteries explosives, infectious materials, and other materials which may be hazardous or difficult to manage;
- 4. Bulky combustible material, vehicles, tires, sewage sludge's, septic tank pumpings, large home or industrial appliances, large dead animals;
- 5. Mixed solid waste from public self-haul;
- 6. Source separated recyclable materials, other than listed drop off materials;
- 7. Materials contaminated with or containing greater than one percent friable or non-friable asbestos;
- 8. Oil other than collected in source separated residential curbside programs;
- 9. Electronic waste disposal;

Unacceptable wastes are segregated for proper characterization and management. A log of such materials will be filled out for each incident. (See Appendix D for additional details.)

Any liquids or other unacceptable wastes are to be removed from the load prior to dumping if possible, and returned to the generator if it is possible to identify the source of the material.

Management will attempt to identify the source of the unacceptable materials and the generator will be called to remove them. If the owner of the unacceptable waste cannot be identified, GSS Transfer will be responsible for proper disposal of the waste, at its own expense.

Any materials suspected to contain friable or non-friable asbestos (ACM) will be thoroughly evaluated by GSS Transfer personnel. If suspect ACM is observed in waste on the floor, the equipment operator will immediately contact a supervisor after clearing people away from the area. The suspect ACM will be handled as detailed in appendix E.

Infectious wastes, other than source separated infectious material stored in our medical waste collection truck or temporarily staged in a locked secure storage area, are not accepted.

Explosives, including small arms ammunition are not accepted under any circumstances. Potentially hazardous wastes must be removed from the site within seven (7) days.

Generators are notified to not place hazardous or other prohibited waste in drop boxes or other collection containers by City of Gresham, Portland educational newsletters, and detailed messaging on every GSS billing statement.

C.6 FACILITY PROCESS FLOW

Attachment A illustrates the general flow of vehicles through the GSS Transfer property.

D. FACILITY TRANSFER OPERATIONS

Route trucks entering the facility are directed to the Transfer Building after scaling in. The Transfer Building is 48' by 70' and is enclosed on three sides with a roof covering the tipping floor and trailer loading pits. The Transfer Station design uses an elevated tipping floor and trailer loading pits for top loading transfer trailers. Trucks first offload solid waste onto the tipping floor. A front end loader then pushes the solid waste into the transfer trailer via a loading ramp that extends out over the trailer. Finally, the solid waste in the transfer trailer is distributed and leveled using a Track Hoe.

D.1 USED OIL STORAGE

GSS Transfer has a 250 gallon used oil storage tank located under a roof and with secondary spill containment underneath. GSS Recycle trucks bring in used oil in small curbside containers (2 gallons or less). After weighing in at scales they proceed to oil storage tank, drain oil into tank and dispose of empty containers in garbage bins beside oil tank. This tank will be emptied on a regular basis. Surrounding area will be regularly cleaned and maintained by GSS Transfer employees.

numbers, date discovered, description of material and generator, if known. Control procedures inside the facility are as follows:

- 1. Material is visually inspected as it is being tipped. The inspection is done by GSS Transfer spotters or operators. Communication devices are provided to allow contact between the spotter/equipment operator, lead person or site supervisor and the office.
- 2. Spotters, lead persons and the site supervisors are trained to spot suspicious waste, unacceptable waste, and special waste. They are knowledgeable about the identifiable characteristics of these types of wastes and the distinctive markings on containers.
- 3. Any suspicious waste delivered to the facility will be managed in accordance with all applicable laws and regulations. Suspicious wastes are materials that may be prohibited and the lack of information associated with the waste does not designate it as acceptable.
- 4. If any inspection or testing performed by GSS Transfer, or others, reveals that any material which is delivered to the facility is unacceptable waste, GSS Transfer will, if possible, contact the generator to have it removed. If the generator refuses to remove the material, cannot safely remove the material, or cannot be identified, then a qualified firm will be contracted to perform the unacceptable waste cleanup in accordance with applicable law.
- 5. When it is detected that unacceptable or hazardous waste has been unloaded at the facility, GSS Transfer personnel will:
 - a. Contain and isolate the detected material;
 - b. If appropriate, notify the Facility Manager who will contact Metro, DEQ or EPA, as appropriate;
 - c. Use good faith efforts to identify the person or persons who delivered the waste. The efforts will use methods that are generally accepted as sufficient to prove responsibility for disposal;
 - d. Preserve and protect the evidence that may assist in proving ownership of, or responsibility for, the unacceptable waste;
 - e. Arrange such cleanup, or require the person(s) who delivered the waste to perform the unacceptable waste cleanup, immediately, in a manner that minimizes contamination of the facility and acceptable waste, minimizes the risk of damage to persons or the environment, and is in accordance with state and federal regulations;
 - f. If the responsible person is unknown or, in GSS Transfer's judgment, is incapable of complying with the requirements for unacceptable waste cleanup, GSS Transfer will arrange the unacceptable waste cleanup;
 - g. Fully document all costs for managing suspicious, hazardous and unacceptable wastes.

GSS Transfer has developed preventive maintenance procedures for the equipment. Daily cleaning of the facility grounds is considered a maintenance function. Additional maintenance schedules will be developed as required.

B.3 FACILITY INSPECTIONS

The Facility Manager or his/her designee conducts a daily site inspection, which covers all aspects of facility operations. If deficiencies are noted, corrective action is taken. Deficiencies which cannot be corrected within twenty-four (24) hours, or which have an impact on regulatory compliance, are documented, and monitored through an internal tracking system to ensure timely resolution.

In addition to daily site inspections, documented inspections by the Facility Manager or his/her designee occur at a minimum of once per month on days not specified in advance. An Inspection Report is used to assure all aspects of the facility are inspected. The date and time of the inspection, the inspector's printed and written name, all observations, and the date and nature of all corrective actions are included on the inspection log. The completed monthly inspection forms constitute the Inspection Log. They are kept in a binder at the facility for at least three (3) years. Environmental, safety or compliance issues noted on self-inspections are corrected as soon as is feasible, and the date and time of repair is noted.

B.4 MAINTENANCE SCHEDULES

All equipment is inspected daily and is documented on equipment inspection forms. The company maintains weekly, monthly, and annual maintenance records. In addition, the company has its drivers complete Daily Vehicle Inspection and Vehicle Condition Reports.

Service and maintenance for all equipment, excluding scales, is recorded on the service record forms. A detail of equipment maintenance, beyond servicing, is recorded on a maintenance work order forms. All equipment maintenance beyond routine servicing requires the Shop Manager's approval.

GSS Transfer submits oil samples from each piece of equipment on a regular schedule, and on oil change, to a qualified lab for wear analysis testing. Wear analysis reports are maintained in the equipment files. The following equipment and areas have specific inspections and maintenance items developed for them. Items are recorded on the service record forms, and the maintenance work order forms.

STORM/SEWAGE, ROOF DRAINS, BUILDINGS AND GROUNDS -The storm, sewage and roof drains receive periodic inspections and are maintained as required.

SCALES -The scales receive an annual inspection and certification by and inspector from the Oregon Department of Agriculture. A certificate of inspection and license are maintained in the scale house and in the office.

C. DESCRIPTIONS OF PERSONNEL DUTIES

Descriptions of duties and required qualifications of facility personnel are provided below:

C.1 FACILITY MANAGER

This position is responsible for the coordination and integration of all activity on the site. The Facility Manager's responsibilities include, but are not limited to:

- 1. Oversee the general operation of the site.
- 2. Formulate and develop rules, regulations, work methods, and procedures; monitor and review work activities and performance.
- 3. Coordinate expenditures for day-to-day operations and, if necessary, supervise the preparation of projected facility improvements.
- 4. Ensuring that proper operational practices are maintained and the site is operating in conformance with the engineering plans and applicable regulating requirements.
- 5. Plan and direct the work activities of a group of subordinates; provide assistance and guidance for difficult or unusual problems; monitor work progress to ensure compliance with operating policies.
- 6. Provide training of Equipment Operators.
- 7. Implement and supervise safety policy; ensure that all necessary safety precautions are observed; coordinate safety meetings for employee groups
- 8. Receive and investigate any complaints and recommend remedial action as appropriate.
- Lead tours of site for pre-arranged individuals or groups.
- Ensure adequate site security.
- Maintain health and safety and environmental compliance overall.

C.2 LEAD PERSON

The Lead Person directly supervises Equipment Operators/Spotters and others as required. The Lead person is a working position in designated areas responsible for ongoing supervision, and direction of the area's workers. The Lead Person insures safety, quality, and performance standards are being met and provides training as required. The Lead Person may assist the Facility Manager in scheduling workers and other tasks that may be delegated. In the absence of the Facility Manager, a Lead Person may be designated to function as the Site Supervisor.

C.3 EQUIPMENT OPERATORS/SPOTTERS

The Equipment Operator/Spotter is a combined position. When loads arrive at the facility they direct arriving vehicles into appropriate areas for scaling or unloading. They ensure the safe and efficient flow of private and commercial vehicles into and out of unloading areas.

The Equipment Operator/Spotter is responsible for visually inspecting solid waste as it is being unloaded in the facility. They look for any suspicious or unacceptable materials, and use good faith efforts to identify the

C.5 SHOP MANAGER

This position has the lead responsibility for all maintenance of the GSS Transfer site. Specific responsibilities include, but are not limited to:

- 1. Develop, implement and track a preventive maintenance program for all facility equipment and Structures;
- 2. Acquire and maintain appropriate tooling and repair equipment to adequately service the facility and its equipment;
- 3. Review routine preventive maintenance on all equipment;
- 4. Schedule and implement facility maintenance;
- 5. In the absence of the Facility Manager, function as the Site Supervisor.

C.6 EQUIPMENT MAINTENCE PERSONNEL

Equipment Maintenance Personnel are responsible for maintaining the effective operation of all equipment. They are appropriately trained on the procedures, controls, and functions of the equipment used at the facility. They will diagnose and perform repairs on the facility and equipment as required. They will also be trained to perform the duties of the Equipment Operator/Spotter as required.

D. OPERATIONS TRAINING PROGRAM

All personnel are required to participate in an on-going training program with an emphasis on safety and loss prevention, employee morale, productivity and customer satisfaction. All personnel are given an orientation program upon hiring after which they then participate in the on-going training programs for all personnel.

This program is designed to educate employees about the overall functioning of the facility, their particular responsibilities, hazards associated with facility operation functions, and methods to minimize such hazards. This program also educates employees about the existence and location of safety equipment, personal protective gear, emergency directories, and the response procedures to follow in the event of an emergency.

As required, selected employees will receive specialized training directly related to their individual work responsibilities and hazardous materials.

VI -GENERAL CONTINGENCY PLAN

A. INTRODUCTION

This section provides information on procedures to be followed in the event of certain unusual occurrences. Because the facility is a vital link in the operation schedule of route trucks bringing materials to the facility, facility functions must continue as normal as possible under these circumstances.

B. INCLEMENT WEATHER

In the Portland area, potential types of inclement weather that could affect operations include:

- 1. "Black ice" or freezing rain
- 2. Excessive rain or snow
- 3. Excessive wind

These conditions could cause some or all material deliveries to stop and could also prevent the transfer of waste from the facility. The number of staff available could also be limited because of travel conditions. The Facility Manager or his/her designate would assess the situation and staff assignments would be adjusted accordingly. It is likely that material volumes would increase in the period following such weather. Special arrangements, including extended working hours, may be necessary in such cases.

C. EQUIPMENT FAILURE

The loader or track hoe are the only pieces of equipment that if broken or unusable, for any reason, might potentially interrupt the flow of material. However, if such an event were to occur for an extended period, material deliveries could be rerouted to an alternate facility until temporary rental equipment is obtained.

All other equipment is mobile equipment and can be easily and quickly replaced with other equipment onsite or from other GSS operations.

D. SITE ACCESS BLOCKAGE

If arterial access to the facility is denied because of an emergency, GSS Transfer will consult with the City of Gresham, Metro and/or Multnomah County regarding an alternative transportation plan. If the blockage appears to be lengthy, trucks may be diverted to an alternate facility. Material at the facility may be held in containers, trailers or on the floor of the facility until conditions allow shipment.

A.3 EMERGENCY CALL LIST

Emergency type	Service provider	Phone Number	
Injury	Legacy Mount Hood Medical Center	(503) 674-1122	
Fire	Gresham Fire Department	911	
Public & Life Safety	Gresham Fire Department	911	
Clean-up	Clean Harbors, Inc.	(888) 375-5336	
Spill Reporting	Oregon Emergency Response System	(800) 452-0311	

B. PREPAREDNESS AND PREVENTION

B.1 DESIGN AND OPERATION

The GSS Transfer facility has been designed and constructed in a manner that minimizes the potential for environmental exposures, fires, and explosions. Its features include concrete and paved material handling areas and appropriate containers for material staging. The facility is inspected regularly and cleaned daily.

Operational procedures, plans, and equipment that further reduce potential environmental exposures include the personnel training program, inspections, reporting procedures, and this Contingency Plan.

B.2 EMERGENCY COORDINATOR AND RESPONSE TEAM

The Environmental, Safety & Health (ES&H) Manager is responsible for handling situations at the facility that require implementation of the contingency plan. The ES&H Manager will assume responsibility for all emergencies and response measures relating to hazardous waste and will report to management regarding spills and emergencies. The ES&H Manager will form an Emergency Response Team. GSS Transfer will maintain a Statement of Authorization for each member of the Emergency Response Team.

The ES&H Manager alternates are familiar with all aspects of the contingency plan, and they retain copies of it in their offices. Additional copies are maintained at the facility for inspection. Either the primary or the alternate ES&H Manager is at the facility at all times or can reach the facility quickly. Members of the facility's emergency response team may also be needed to assist the ES&H Manager in the event of an incident. Their specific duties are described in the operations personnel training plan maintained by the facility (Section V). The ES&H Manager has the authority to commit whatever GSS Transfer resources are needed to carry out the contingency plan.

General Procedure for Emergencies:

In the event of an imminent or actual emergency situation, the following steps will be taken:

- Contact the ES&H Manager or alternate;
- The ES&H Manager/Alternate Emergency Coordinator will activate internal facility alarms or

- 7. Instruction concerning detailed procedures to effectively respond to emergency situations and implement the contingency plan;
- 8. Routine inspection and testing program for all safety-and emergency-related equipment and protective devices (the results of which will be discussed at the safety meetings). This is part of the facility maintenance procedures (see Section IV);
- 9. Thorough investigation of all accidents to ascertain their cause and to devise methods to prevent them from recurring;
- 10. Issuance of an employee safety manual to each department for use in training sessions and for personal reference;
- 11. Posting of safety bulletins or posters concerning accidents, hazards, or hazardous conditions occurring elsewhere in the industry;
- 12. Routine walk-through inspections conducted by company personnel through all areas of the facility, seeking out potential or current safety hazards, including permanent equipment and building features;
- 13. Maintenance of a training log indicating date of training and employee's name;
- 14. Observation of all applicable Occupational Safety and Health Administration (OSHA) standards.

Annual training review for all employees. Training review includes discussion of pertinent hazards at each department.

B.5 SECURITY

The facility has established security measures to prevent entry of unauthorized persons. Access to the site is controlled by perimeter fencing and gates across the entrances. The gates are kept closed when the facility is not receiving waste. Supervisors, maintenance personnel, and lead persons have keys to open all facility gates.

C. EMERGENCY EQUIPMENT

C.1 EXTERNAL COMMUNICATION SYSTEM

In a major emergency, any situation that endangers life and/or property, or is a threat to adjoining properties, the Site Manager will call, or designate someone to call, the proper authorities and corporate management. All telephones at the facility have the capability of off-site calling.

C.2 ALARM SYSTEMS AND INTERNAL COMMUNICATIONS

GSS Transfer has developed a communication and alarm system capable of initiating the emergency response procedures and of enabling rapid evacuation of affected areas. The internal communication and alarm system consist of:

- 1. Landline Telephones;
- 2. Cellular Telephones;
- 3. Monitored alarm and fire system.

Cellular telephones are carried by most GSS Transfer operations staff. GSS Transfer administrative staff are also in telephone contact with facility personnel.

amount of material, and where the release occurs. The following is the general definition of a minor emergency and the general definition of a major emergency.

Minor Emergency Definition:

- Any situation that could possibly endanger personnel or damage property in a given process or area but that can be controlled with available facility portable emergency equipment and/or facilities and staff;
- 2. Adjacent areas and neighboring properties are not endangered, full mobilization of the facility is not required, although outside help may be called in as backup;
- 3. Any situation where the specific hazards of the spilled or released waste are compatible with other nearby materials and/or do not constitute a potential threat to human health or the environment.

Major Emergency Definition:

- 1. Any situation that could endanger personnel and/or property that is also a threat to neighboring areas or the community surrounding the facility;
- 2. Outside help must be secured and the facility mobilized to control the emergency;
- 3. Any situation where the specific hazards of the spilled or released waste are deemed to be incompatible with nearby materials and/or constitute a potential threat to human health or the environment.

D.4 PLAN IMPLEMENTATION

The activities involved in implementing the contingency plan and the sequence in which they are implemented are listed and then described below. The Site Manager is responsible for implementing the following activities:

- 1. Briefly assess the situation to determine whether a total or partial facility evacuation is necessary (i.e. decide whether circumstances constitute a minor or major emergency);
- 2. Assess potential hazards to human health or the environment presented by the release;
- 3. Assess the source, extent and nature of the material involved in the release;
- 4. Activate alarm, if necessary;
- 5. Initiate partial or total facility evacuation, if necessary;
- 6. Isolate the spill with absorbent material, if necessary;
- 7. If a major emergency has occurred, including a reportable spill, telephone OERS and the spill response contractor. If a minor emergency has occurred and outside help is needed, telephone spill response contractor;
- 8. Implement notification procedures (Corporate Management and/or Metro, DEQ, or EPA). The spill response contractor will implement control and cleanup procedures as required.

A detailed spill response, and asbestos identification plan is explained in Section D.9 to D.11 and appendix E.

the amount of waste that has been released;

- 4. Container Labels: All hazardous materials packaging should be labeled. The label will help identify the type of waste in the event of a release. Deposited wastes will be examined for containers showing evidence of leakage. If the generator is known, have a MSDS faxed to the facility, the MSDS may identify the type of waste;
- 5. Other Information: Visual observations of the labels and existing chemical analyses of wastes will be used to determine potential identity and risks of the release. If the identity of the material released cannot be accessed through these means, the Site Manager will consult the spill response contractor;
- 6. Initial Response Sampling and Analysis: All response sampling and analysis will be conducted by the spill response contractor. He or she will perform any further activity necessary to stabilize cleanup and decontaminate the area.

D.8 ASSESSMENT AND OFF-SITE NOTIFICATION

After tentatively identifying the material that has been released, the Site Manager will assess possible hazards to human health or the environment that may result. Addendum 2 is a Hazardous Waste Assessment Guide to assist in the evaluation and record keeping of the incident. This will be done by reviewing MSD sheets for materials potentially encountered at the facility and evaluating the available information about the materials involved and the quantity and location of the release.

If the Site Manager determines that the facility has had a release, fire, or explosion that could threaten human health or the environment and cannot be controlled with available facility response equipment, or that requires evacuation of the immediate facility vicinity, the Site Manager or the alternate present at the site, will immediately initiate the following notification procedures:

- 1. Contact facility and corporate personnel as needed from the Authorized Emergency Coordinators List shown in Section VII, A.2;
- 2. Contact the external authorities from the Emergency Call List shown in Section VII, A.3 at the direction of the Environmental Compliance Manager or Operations/Safety Manager;
- 3. Provide the following information to authorities, if available;
- Name and telephone number of caller and name and address of facility;
- Time and type of incident;
- Name and estimated quantity of materials involved and extent of injuries;
- Possible hazards to human health or the environment outside the facility;
- Steps taken to contain or clean up hazardous material;
- Agencies that have been notified.

Releases of more than a specified amount of hazardous substances listed in 40 CFR 302.4 (referred to as a Reportable Quantity) must be reported to the National Response Center. This applies to releases of substance beyond secondary containment provisions at the facility where the substance enters soil, surface water, or air. Any spills meeting the Reportable Quantity Requirements of OAR 340-142-0050 are to be reported immediately to the Oregon Emergency Management Division's Oregon Emergency Response System (OERS) by calling 1-800-452-0311.

Table 6 below lists the control procedures that may be implemented in the event of a major emergency. The contingency plan will be implemented in the event of a major emergency. Major emergency steps listed below may occur concurrently to each other.

Table 6 Major Emergency Procedures (Contingency Plan Activated)

- 1. Maximize safety of all employees and visitors to the area. Prevent inadvertent access into the release area by using traffic control devices or by staffing the location with an employee.
- 2. Implement partial or full facility evacuation, if necessary.
- 3. Call spill response contractor to perform assessment and cleanup.
- 4. Stop container leak at source, if possible. (This should only be attempted with proper PPE and adequate equipment for the spilled material).
- 5. Contain spilled material. Use absorbent material to contain spilled liquids if there is a risk that the liquid will spread.
- 6. Notify corporate management and the agencies in D.8, as appropriate.
- 7. Clean up spill in accordance with accepted procedures. This is the responsibility of the spill response contractor.

D.12 PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, OR RELEASES

During an emergency, the Site Manager or his/her designate, will undertake reasonable measures necessary to minimize the potential for a secondary fire, explosion or release. The following procedures will be carried out:

- 1. Access to the affected area will be controlled to reduce the possibility of spilled material spreading to other areas;
- 2. Containers, valves, pipes, and transfer vehicles in the affected area will be inspected for other potential for releases. Valves will be closed to reduce the potential for additional releases;
- 3. The affected area will be inspected to determine whether gas or heat buildup is occurring and whether this could lead to a fire or explosion. If so, fuel valves will be closed and electrical power which does not hamper firefighting equipment will be shut off;
- 4. Waste materials will be isolated to reduce the possibility for contact with any potentially incompatible materials.

If there is a risk of fire, any containers of ignitable materials that may be stored nearby will be removed from the area or have water sprayed on them.

D.13 STORAGE AND DISPOSAL OF RELEASED MATERIAL

Wastes that are involved in an unplanned release will be cleaned up as described earlier in D. 9-11. Following control of the release, drums containing spill residue, contaminated soils, absorbent, contaminated clothing, and decontamination equipment and residues will be labeled and removed to an appropriate storage/disposal facility by a licensed contractor.

By using test data and referring to chemical compatibility information, the spill response contractor will determine the appropriate method and location for storage.

D.14 INCOMPATIBLE WASTES

Incompatible wastes (hazardous materials, liquids, etc.) will be removed from the waste stream, segregated into appropriate categories, and staged for pickup and disposal by the spill response contractor or the generator.

D.15 POST EMERGENCY EQUIPMENT MAINTENANCE

The Site Manager is responsible for overseeing the post emergency equipment inspection. The specific details of the inspection plan depend on the type and extent of the emergency. Following is a list of typical inspection procedures:

- 1. Replace fire extinguisher(s) used during the emergency.
- 2. Check stock items in first aid and spill kits and replenish as needed.
- 3. Conduct general housekeeping inspection of production areas affected by the emergency, including but not limited to electrical and hydraulic systems, ventilation equipment and mobile equipment.

Management will assess each post-emergency situation and develop an appropriate inspection schedule to implement corrective actions.

SECTION VIII -REPORTING PROCEDURES AND COORDINATION

A. GENERAL

The GSS Transfer facility uses a reporting system that allows both internal functioning and a flow of required information to Corporate Headquarters, DEQ and Metro. The reporting system has been designed to integrate smoothly with the daily work routines of staff members with reporting functions. This section contains a description of the facility reporting and information system.

With the exception of required reporting and operational data, all personnel and operational files are kept by the personnel department at the Corporate Office.

B. REPORTS/RECORDS

A monthly facility report is generated which summarizes all daily and weekly tonnage and operational data for each month.

B.1 PERSONNEL RECORDS

Complete detailed personnel records are maintained at the Corporate Office.

B.2 TRAINING RECORDS

Employee training records are kept in the corporate Office and are stored in individual employee files. As an employee receives work related training, documentation of the training is placed in the individuals file. Training records are archived at the corporate office when an employee leaves GSS Transfer employment. Training records are retained, at a minimum, for as long as specified by the individual training requirements.

B.3 WASTE DISPOSAL RECORDS/REPORTS

Incoming Materials;

Drivers of vehicles entering the facility weigh the truck on our certified scale and fill out a scale ticket. The following information is listed on the incoming ticket:

- 1. Date and time;
- 2. Hauling Company, driver and truck number;
- 3. Type of material; Solid Waste or Yard Debris;
- 4. Source of load;
- 5. Area material collected;
- 6. Gross, net and tare weight.

The inbound load transaction data will be entered into our billing and reporting system on a daily basis.

B.5 PERSONAL INJURY ACCIDENTS

In the event of a personal injury accident, the Facility Manager or other senior individual assumes immediate responsibility at the scene. He/she seeks assistance from other employees, designates someone to make necessary calls and administers first aid. The victim should not be moved if there is a possibility of broken bones or severe injury.

Accident response and reporting procedures are outlined in Section IX, of this manual, and in the GSS Transfer Health and Safety Manual.

B.6 MONITORING AND REPORTING REQUIREMENTS

GSS Transfer is required to submit monitoring reports to Oregon DEQ and other agencies on a scheduled basis. GSS Transfer's annual Stormwater testing report is compiled by the Facility Manager and submitted to DEQ. Annual recycling and monthly volume reports are compiled by Corporate Accounting and submitted to Metro and/or the DEQ as scheduled. The State of Oregon Fire Marshal report is completed and submitted annually to the State Fire Marshal, by Management.

Three rules should be applied when evaluating possible emergency response actions:

- 1. Do not do anything that would make the damage or cleanup extensive unless it is absolutely necessary to protect human health or life. This also means weighing general environmental damage against limited property damage;
- 2. Do not assign an employee to take an action unless he or she is properly trained and has the necessary protective equipment. To do otherwise could result in serious injury to your fellow employee. This rule can be violated voluntarily in order to protect a human life;
- 3. Do only what you have been trained to do.

All workers must work safely and efficiently; they must remember that excessive speed in the work area is unsafe to all employees, co-workers, and the public.

No employee is to operate any equipment unless properly trained, and then only after receiving the supervisor's permission.

Selected employees are required to have a valid First Aid card in their possession. At least one employee trained in first aid will be on site during working hours.

B.1 SAFETY TRAINING PROGRAM

This section describes the safety training program in use at the facility. See Section V for a description of the general operations training program.

Every GSS Transfer employee is adequately trained to perform his or her job safely and efficiently. The inhouse training program incorporates specific requirements for the facility, and may also include OSHA requirements. For example, the development of an accident prevention program is included in the training program. The accident prevention program includes periodic site staff safety meetings to discuss safety issues, review any hazards identified during site inspections, and evaluate corrective measures for any unsafe condition. The meetings are tailored to the particular operation and attendance is mandatory. An in-house training program will contain the following:

- 1. All training required by OSHA;
- 2. Training for employees in the use and location of safety equipment at the site;
- 3. Training for employees in the emergency response and contingency plan procedures.

In addition to the usual hazards present in an industrial work place, the waste handling system places spotters and loaders in proximity to the waste. Because potentially dangerous materials may be encountered in any waste handling system, GSS Transfer includes a safety and training program for all such workers. The program defines hazardous waste and other potential hazards. It covers the characteristics of hazardous material -ignitable, corrosive, reactive, and toxic. The program explains methods for identifying, recognizing, and responding in the event that these materials are encountered. A safety officer conducts the training and is available to answer questions.

In addition, Material Safety Data Sheets (MSDS) are available for hazardous materials stored on-site. The hazardous properties of these materials and the type of precaution to use when handling the material are

SECTION X – E-WASTE DISPOSAL BAN

Oregon's 2007 Electronics Recycling Law prohibits any person from disposing of computers, monitors and televisions (collectively known as "covered electronic devices" or CEDs) after January 1, 2010. It also prohibits solid waste disposal facility operators from knowingly accepting these devices for disposal after that date, and requires disposal site operators to implement a program to prevent acceptance of these devices for disposal. The following elements make up the program for this company's disposal site.

A. GATE OPERATIONS

The following measures will be taken to discourage delivery of CEDs to the facility for disposal and to identify CEDs that arrive for disposal.

A.1 SIGNAGE & NOTIFICATION

Prior to January 1, 2010, signs were posted at the entrance gate, or similar location, of the Transfer Station alerting all customers of the disposal ban. The sign(s) indicate that the following CEDs are prohibited from disposal:

- 1. A computer monitor of any type having a viewable area greater than four inches measured diagonally;
- 2. A desktop computer or portable computer; or
- 3. A television of any type having a viewable area greater than four inches measure diagonally.

By January 1, 2010, signs were posted directing customers to the nearest e-waste drop off location for recycle or reuse. Signage indicates the location of the on-site facility for e-waste acceptance.

A.2 INSPECTION OF INCOMING LOADS

The designated employee (Lead Person) will:

- 1. Ask the driver if there are any prohibited materials, including CEDs, in the load;
- 2. Enumerate the entire list of excluded materials for anyone appearing to be unsure or careless in responding;
- 3. Observe the load for indications of prohibited wastes; and
- 4. Notify an equipment operator or other designated employee if suspicious of the load.

If e-waste is found in a load destined for disposal, the following measures will be implemented to determine where the e-waste originated:

- 1. Question the driver about the material, if available, and direct the driver to the nearest e-waste drop off location for recycle or reuse;
- 2. If customer is not available but source of e-waste can be determined, contact customer if there are repeated violations to inform the customer of the disposal ban in order to prevent e-waste in future loads;
- 3. If no ownership can be established, segregate the waste and haul to the designated on-site e-waste drop off location for recycle or reuse.

- 1. Recordkeeping: Provide each employee with a copy of the "E-Waste Disposal Ban" Section of the Operations Plan. Have employees read, sign, and date a copy of the "E-Waste Disposal Ban" Section of the Operations at the end of employee training.
- 2. Identification of CEDs: Show employees, either with a picture or visual, a whole desktop, portable computer, television, and monitor, both flat-screen and cathode ray tube (CRT), with a viewable area greater than four inches measure diagonally.
- 3. Inspection of Incoming Loads: Tell employees what questions to ask of customers with incoming loads (refer them to the "Gate Operations" section.)
- 4. Handling incoming CEDs: Tell employees how to handle CEDs that are found for disposal by reading the "Management Practices" section. and answering any questions employees may have about the procedures.
- 5. Cleaning Up Broken CEDs: Show employees how to properly clean up broken CEDs, as outlined in the "Management Practices" section of the operations plan.

C. ACCEPTABLE E-WASTE

E-Waste is accepted on a drop off basis by our Gresham Sanitary Service division and is limited to computers, monitors, televisions, printers, keyboards and mice covered under the Oregon SCP E-Cycles program.

C. 1 UNACCEPTABLE WASTE

Items not covered under the Oregon SCP E-Cycles program are not accepted.

- CRTs with broken glass are not accepted.
- No recycling or processing is conducted on site.

C.2 E-WASTE RECEIVING

- All incoming Electronic Waste is screened by visual inspection. Only items covered under the Oregon SCP E-Cycles program are accepted.
- All loads containing prohibited wastes or unauthorized wastes will be rejected.

C.3 MATERIAL STORAGE AND PROCESSING

- All materials are stored under cover and are not exposed to stormwater, atmospheric conditions, floods, and unauthorized access.
- Personnel are trained in proper handling and protective measures to prevent inadvertent breakage

C.4 WASTE SORTING AND RECOVERY

No recycling or processing is conducted on site.

C.5 PROCEDURES FOR MEASURING QUANTITIES OF WASTE RECOVERED FOR MATERIAL RECOVERY SURVEYS AND/OR RECYCLING RATES

All loads shipped are recorded on a shipping log. The material weights provided by the Oregon E-Waste processors will be reported on our monthly recycling reports that are submitted to the City of Gresham. In addition the material weight will be reported on the annual DEQ Recycling Collector Survey.

C.6 DOWNSTREAM DUE DILIGENCE

Electronic waste will only be shipped to processors approved by the Oregon SCP E-Cycles program. The

APPENDIX

- A. Litter control for waste-related uses
- B. Dust, Mud, Vector Control
- C. Odor Control Plan
- D. Unacceptable Waste Exclusion Plan
- E. Special Waste Management Procedures Plan
- F. Spill Response Plan
- G. Closure Protocols
- H. Complaint Logging

A. LITTER CONTROL FOR WASTE-RELATED USES

A litter control program is maintained daily for all areas within the GSS Transfer site. Litter control is constantly monitored with areas being addressed as incidences occur. Regular routes covering the perimeter of the site are maintained daily. The immediate area on Birdsdale Avenue is monitored daily and litter is picked up as incidences occur. Upon observation or notification of illegally dumped waste products near the site, the litter patrol immediately cleans up the identified area

A warning is issued to all drivers coming into the GSS Transfer site that are not tied down or covered in order to minimize littering from the vehicle. The warning informs the driver that loads that are not tied down or covered will not be accepted.

All commercial vehicles coming into the site are either covered with tarps or completely enclosed in order to minimize any discharge of material. This meets the regulatory requirements for waste-related vehicles.

B. DUST, MUD, VECTOR CONTROL

The dust and mud control is maintained by our company owned sweeper truck. The sweeper truck has regular service days that cover all areas of the site. Since the travel areas are all asphalt, there is a minimal amount of problems that occur on site.

The facility is designed and operated to minimize dust. All access roads are paved to reduce dust. The facility design also minimizes dust generation by using a tipping floor rather than a pit design. Because materials fall only a short distance, dust generation is significantly reduced. Any loads containing excessive dust will be wet down to reduce dust emissions. Route drivers report to management any issues with dust or uncontained fines at the point of collection. Management will then contact the generator to discuss containment requirements.

Pest control is maintained by an outside firm which conducts regular service to the site on a Monthly basis. If any unusual situations occur, the Pest Control Company can respond on a daily or weekly basis if needed. Minimal problems have been noted in the past for this site.

2. Prevention

The most effective way to eliminate unacceptable waste from the facility is to prevent its initial entry. GSS Transfer has implemented the following methods to prevent unacceptable waste from entering the facility:

- A. Customer Education;
- B. Special Waste Program;
- C. Signs;
- D. Inspection of Loads;
- E. Spotter.

3. Detection

If unacceptable waste is discovered in the solid waste, efforts are made to remove that waste as soon as possible. Early detection increases the likelihood of identifying the waste generator. Unacceptable waste detection will be performed by collection vehicle drivers, the transfer equipment operator/spotter, and other GSS staff who have occasion to view the waste stream.

GSS Transfer & Third Party Drivers

Drivers are the first line of defense for detecting and removing unacceptable waste from the waste stream. Prior to transporting a customer's material, drivers will usually inspect the visible portion of each load for unacceptable waste. If the driver suspects that a load might contain unacceptable waste, he or she should immediately contact dispatch for instructions.

Equipment operator/Spotter

An equipment operator/spotter will observe tipping operations at the facility. The equipment operator/spotter must have specified safety equipment readily available. As solid waste is dumped onto the tipping floor, the operator/spotter will carefully scrutinize the material for unacceptable waste that may be contained in the load. Suspected unacceptable waste will be handled by the procedures identified in Section 4.

The Facility Manager will designate and train staff members who will be assigned as equipment operators/spotters. The training will include detection, recognition, identification, and handling of suspected unacceptable and hazardous waste. The training will also include use of protective clothing and equipment.

Personnel

All other transfer personnel will receive annual training in the recognition of unacceptable waste. As these personnel perform their daily tasks, they should watch for unacceptable waste and notify the spotter or their supervisor if they suspect a waste is unacceptable.

4. Managing Unacceptable Wastes

There are two possible scenarios for the management of unacceptable waste:

Scenario 1 -Generator Known:

If the generator or hauler can be identified, they will be directed to safely load and remove the

- The load contains Putrescible ("wet") Solid Waste"; which means all useless or discarded putrescible
 and non-putrescible materials, including, but not limited to, garbage, rubbish, refuse, ashes, paper
 and cardboard, useless or discarded commercial and industrial materials, discarded or abandoned
 vehicles parts, manure, vegetable or animal solid and semisolid materials and dead animals;
- No other wastes shall be accepted unless specifically authorized in writing by all regulatory authorities with jurisdiction.

This facility rejects any load if:

- The load contains only dry non-putrescible dry waste or construction and demolition (C&D) waste.
 C&D waste means solid waste resulting from the construction, repair, or demolition of buildings, roads and other structures, and debris from the clearing of land. Such waste typically consists of materials including concrete, bricks, bituminous concrete, asphalt paving, untreated or chemically treated wood, glass, masonry, roofing, siding, plaster; and soils, rock, stumps, boulders, brush and other similar material;
- The load contains hazardous waste, which includes the following:
 - (a) Discarded, useless or unwanted materials or residues resulting from any substances or combination of substances intended for the purpose of defoliating plants or for the preventing, destroying, repelling or mitigating of insects, fungi, weeks, rodents or predatory animals, including but not limited to defoliants, desiccants, fungicides, herbicides, insecticides, nematocides, and rodenticides;
 - (b) Residues resulting from any process of industry, manufacturing, trade or business or government or from the development or recovery of any natural resources, if such residues have been classified as hazardous by any government authority with jurisdiction;
- The load contains "Industrial Solid Waste", which means solid waste generated by manufacturing or industrial processes. Such waste may include, but is not limited to, waste resulting from the following processes: Electric power generation; fertilizer/agricultural chemicals; food and related products/by-products; inorganic chemicals; iron and steel manufacturing; leather and leather products; nonferrous metals manufacturing/foundries; organic chemicals; plastics and resins manufacturing; pulp and paper industry; rubber and miscellaneous plastic products; stone, glass; clay and concrete products; textile manufacturing; transportation equipment; water treatment; and timber products manufacturing. This term does not include construction/demolition waste; municipal solid waste from manufacturing or industrial facilities such as office or "lunch room" waste; or packaging materials for products delivered to the generator;
- The load contains "Cleanup Materials Contaminated by Hazardous Substances", which means contaminated materials from the cleanup of releases of hazardous substances into the environment, and which are not hazardous wastes as defined above;
- The load contains materials contaminated with or containing greater than one percent friable or non-friable asbestos;
- Hazardous waste as defined in ORS 466.005;
- Radioactive waste as defined in ORS 469.300;
- Chemicals, liquids, Batteries, explosives, infectious materials, and other materials which may be

F. SPILL MANAGEMENT PLAN

Leaks and spills at the Transfer Station are most likely to be caused by defective or broken equipment hoses or vehicle collisions. The substances most likely to be released include: hydraulic fluid, diesel fuel, and motor oil or radiator fluid. Training on spill prevention is provided to all operational employees. To contain any possible spills associated with daily truck maintenance, employees are only allowed to add motor, transmission, hydraulic or coolant to trucks in our truck wash or inside the shop building. The preventive maintenance program for equipment helps minimize potential releases or spills.

If a spill or leak occurs, efforts will be taken to prevent the released substance from entering the sewer and storm water collection points. All employees will be trained in spill response activities. The facility will be equipped with spill response equipment including: containment booms, UIC grate blocks, absorbent pads and granular floor sweep. Contaminated absorbent materials and collected residual product will be handled and disposed of in compliance with permit conditions and applicable laws and regulations.

If a reportable spill occurs then the Oregon Emergency Response System (OERS) will be notified at 1-800-452-0311.

A reportable spill includes:

- Any amount of oil to waters of the state;
- Oil spills on land in excess of 42 gallons;
- Hazardous materials that are equal to, or greater than, the quantity listed in the Code of Federal regulations, 40 CFR Part 302(List of Hazardous Substances and Reportable Quantities), and amendments adopted before July 1, 2002.

When the spill is reported the following information will be provided:

- Type of oil or hazardous material;
- Quantity;
- Location of spill (land or water);
- Names and phone numbers.

G. CLOSURE PROTOCOL

In the event of a short-term cessation of operations (7 days to 30 days), management will contact all impacted customers and advise them of the approximate time the closure will be in effect. The gates will be closed and a sign will be posted on the gates advising of Temporary Closure. All outbound material will be transported as soon as is feasible. DEQ and METRO will be advised of the nature of the problem, the proposed resolution and the approximate time of reopening.

In the event of a long-term or permanent cessation of operations, management will immediately contact and meet with DEQ and Metro as early as it is known that there is a plan to cease operations. As the result of meetings with DEQ Metro, the best course of action possible will be decided which serves our company, DEQ, Metro, and the customer base. If at all possible, efforts will be made to secure alternative options for the customers in order to not cause any significant disruption of their business.

ADDENDUM 1

- A. Initial asbestos training form
- B. Annual asbestos training form

B. Annual Refresher Training - No time requirement specified

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www.greshamsgnitary.com



www.greshamsanit	ary.com		
પ્ Date			
Re: Asbestos Aw	areness Training		
Refuse and Recyc	cling Association's	PowerPoint prese	entation, "Asbestos Awareness."
containing mater	rials and presumed	d asbestos-contain	s of friable asbestos, recognition of asbestos- ning materials and the proper response to s fiber release episode.
The following inc	lividuals attended	the Asbestos Awa	areness Training class held at LOCATION OF
TRAINING		:	
	Name		Date of Birth
		<u>.</u>	
			,
Signed by:			
Name:			
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A. HAZARDOUS WASTE ASSESMENT GUIDE

D.E.C.I.D.E - When responding to spills

Two rules apply when responding to spills or hazardous materials discovered in the solid waste load. Work safely and don't make the spill worse than it already is. What actions you take will depend on the first analysis of the situation. Take nothing for granted and be ready for the worst. Assume that whatever can happen, will. Most importantly, don't jump into emergency response activities in haste without the proper personal protective equipment.

The first step is to evaluate the risk and start notification procedures. Risk assessment is a natural function you do every time that you cross the street or drive to work.

You study the situation and try to predict the various possibilities that may occur until the spill is cleaned up or the hazardous materials are removed from the solid waste load.

First, you must know the identity of the substance and the particular risks that are associated with it. The identity of the material should be on the container label or the packaging slip. Risk information on the substance can also be found on the label or in the Material Safety Data Sheet book located in the wall outside of the Shop Manager's office. The risk assessment must consider the danger of the material, integrity of the container, and the potential area of danger should the material escape.

A word that may help you manage a spill is L. Benner's D.E.C.I.D.E. system for managing hazardous materials incidents. D.E.C.I.D.E. is an acronym which stands for the following steps which provide a framework for making emergency decisions during an incident.

- D Detect hazardous materials presence.
- E Estimate likely harm without intervention.
- C Choose response objectives.
- I Identify action options.
- D Do best option.
- E Evaluate progress.

The integrity of the container can be determined by applying the second step of the D.E.C.I.D.E. process; namely, estimating the likely harm without intervention. This step involves determining the stresses applied to the container and what their effect will be on the container. These stresses may be in the form of thermal, mechanical, of chemical attack on the container. If the stressed applied to the container exceed the container's ability to dissipate the stress, the container breaches and the contents are released. (Benner, L. "D.E.C.I.D.E. in Hazardous Materials Emergencies," Fire Journal 7/75)

If, after analysis of the situation, the risk to perform a cleanup appears high, keep the situation under control, and have the experts come in to do the job. Avoid all unnecessary risk to GSS Transfer's employees. Spill cleanup firms are listed in Section V, E. and VII, A.3 of this plan. Should the decision be made to clean up the spill, proceed with caution.

Household Products contained solvents such as ACETONE & METHYL ETHYL KETONE, Continued

SPILL OR LEAK PROCEDURES - (Always wear recommended personal protective equipment.)

Steps to be taken in case material is spilled or released: Eliminate all sources of ignition in the vicinity of the spill or released vapors. Isolate the spill area. Permit only trained personnel wearing full personal protective equipment to enter the spill area. Terminate the leak immediately, if possible. Collect the spill in a waste container for disposal. Then flush the spill area thoroughly with water; wash contaminated equipment thoroughly with water.

Management of Waste: Flushings and wash water must be contained and prevented from entering a waterway. Spills of acetone and MEK should be reported to federal, state and local environmental agencies, including the National Response Center (800-424-8802).

Cleaning Products and Drain Cleaners containing CAUSTIC SODA LIQUID 30% & 50%, LYER, SODIUM or POTASSIUM HYDROXIDE

HEALTH HAZARD DATA

Inhalation: Inhalation of mists may be severely irritating or corrosive to the nose, mouth, throat and lung. Exposure may cause burns to the respiratory tract with the production of lung edema which can result in shortness of breath, sneezing, choking, chest pain and impairment of lung function. Inhalation of high concentrations may result in permanent lung damage.

Eye contact: Exposure to liquid or mists can cause severe irritation and/or burns, with symptoms of tearing, redness, swelling and pain. Corneal damage with impairment of vision may result from direct contact with liquid.

Skin contact: Exposure to liquid or mists can cause severe irritation and/or burns characterized by redness, swelling and scab formation. Prolonged skin exposure to liquid mat cause destruction of the dermis with impairment of the skin to regenerate at site of contact. No published data indicates material is absorbed through the skin. Ingestion: Ingestion can cause severe irritation and/or burns to the entire gastrointestinal tract, including the stomach and intestines, characterized by nausea, vomiting, diarrhea, abdominal pain, bleeding, and/or tissue ulceration.

SPILL OR LEAK PROCEDURES

Land spill: Wear recommended protective clothing. Dike the spill using soil, sand or a compatible commercial absorbent. Pick up bulk of liquid using pumps or vacuum truck or absorb liquid in sand or commercial absorbent. Place liquid in approved containers for recovery or disposal. Neutralize remaining traces of material with any diluted inorganic acid, such as hydrochloric, sulfuric, nitric, etc. The spill area should then be flushed with water, followed by a liberal covering of sodium bicarbonate. Collect rinsate and containerize for disposal. Prevent run-off from contaminating sewers, streams, or other bodies of water.

Water spill: This solution is heavier than water and is also completely soluble in water. Stop or divert water flow. Dike contaminated water and remove for disposal and/or treatment. Notify all downstream users of possible contamination.

PAINT THINNER, Continued

FIRE AND EXPLOSION DATA

Extinguishing media: Water spray, foam, carbon dioxide, dry chemical.

Special firefighting procedures: Full protective equipment, including self-contained breathing apparatus, is recommended. Water from fog nozzles may be used to cool closed containers to prevent possible pressure buildup.

Unusual fire & explosion hazards: When heated above the flash point, emits flammable vapors which, when mixed with air, can burn or be explosive. Fine mists or sprays may be flammable at temperatures below the flash point.

SPILL OR LEAK PROCEDURES

Steps to be taken in case material is released or spilled: Ventilate area. Remove sources of ignition. Prevent skin contact and breathing of vapor. Wear a properly fitted vapor/particulate respirator (NIOSH/MSHA TC-23C). Confine and remove with inert absorbent.

Management of Waste: Do not allow material to contaminate ground water systems. Incinerate absorbed material in accordance with federal, state, and local requirements. Do not incinerate in closed containers.

PHOSPHATE CLEANER

HEALTH HAZARD DATA

Eyes: Sever irritant, cause's burns to eyes.

Skin: Causes severe irritation or possible burns to skin.

Inhalation: Breathing of vapors or mists could produce harmful effects to respiratory system.

Ingestion: Swallowing of this material might be harmful or fatal.

FIRE AND EXPLOSION DATA

Extinguishing media: Product is not combustible

Special firefighting procedures: When firefighting, wear full protective equipment including self-contained breathing apparatus.

Unusual fire and explosion hazards: May produce hazardous fumes or hazardous decomposition products. Contact with some soft metals like aluminum and zinc can generate flammable/explosive hydrogen gas. Extinguish all nearby sources of ignition since flammable hydrogen gas will be liberated from contact with some metals.

SPILL OR LEAK PROCEDURES

Steps to be taken in case material is released or spilled:

Small spill: Use an approved inert material to absorb spilled product or neutralize spill with small quantities of lime or sodium carbonate and flush to sewer.