

5801 Christie Avenue, Suite 600, Emeryville, CA 94608-1939 Fax: 510-547-5043 Phone: 510-450-6000

October 6, 2008

Danielle Stefani Hazardous Materials Coordinator Livermore Pleasanton Fire Department 3560 Nevada Street Pleasanton, CA 94566

> RE: Additions to August 5, 2008 Site Investigation and Cleanup Work Plan for the Nica Metals Facility at 6491 Southfront Road, Livermore, California

Dear Ms. Stefani:

Weiss Associate (Weiss) prepared this letter on behalf of Nica DMT, Inc. (Nica) to provide additional detail regarding proposed activities presented in Section 2 of the Site Investigation and Cleanup Work Plan dated August 5, 2008 submitted to your agency for the subject site. The detail includes:

- schedule for Livermore Pleasanton Fire Department (LPFD) oversight
- procedures for handling saddle tanks
- procedures for handling miscellaneous oily scrap in roll-off bin
- waste characterization and disposal procedures

LIVERMORE PLEASANTON FIRE DEPARTMENT OVERSIGHT

Nica proposes to conduct the cleanup activities detailed herein on Thursday, October 9th, 2008, commencing at approximately 8 AM. Weiss understands that LPFD representatives would like the opportunity to inspect the operation. LPFD will be notified at least 24 hours in advance of any change to the proposed schedule.

A Weiss Field Operations Supervisor (Charles Crocker, 510-599-8933) who is properly trained in accordance with U.S. Environmental Protection Agency¹, and U.S. and California Occupational Safety and Health Administration^{2,3} requirements applicable to hazardous waste

¹ 40 C.F.R. § 311.1, Worker Protection

²29 Code of Federal Regulations 1910.120, Hazardous Waste Operations and Emergency Response

³ Title 8, California Code of Regulations,§5192, Hazardous Waste Operations and Emergency Response

operations and is experienced in such operations, will supervise and document these activities. Health and Safety Plan (revised October 3, 2008) and a Spill Control Plan are included in Appendices A and B to this letter, respectively. All on-site workers will attend a tailgate meeting before work comments. Environmental protection and health and safety concerns will be discussed during the tailgate meeting.

PROCEDURES FOR HANDLING SADDLE TANKS

Six diesel saddle tanks exist at the site. Product will be removed from these tanks and containerized for off-site disposal or recycling. The tanks will then be cleaned and sent to another Nica facility for recycling. The saddle tanks will be managed in accordance with: 1) EPA regulations contained in Section 40 CFR §261.7(b)(1) – Residue of Hazardous Waste in Empty Containers; 2) California Code of Regulations, Title 22, Division 4.5, Chapter 11, §66261.7(b) and (e)(2) – Contaminated Containers; and 3) US Department of Transportation regulations, 49 CFR §173.2 – Hazardous Materials Classes. The following specific procedures will be followed for emptying, cleaning, and removing the fuel tanks:

- 1. The contents of each tank will be hand-pumped into a U.S. Department of Transportation (DOT)-approved 55-gallon drum.
- 2. The tanks will then be elevated so that any remaining free product will drain into the drums.
- 3. Waste drums will be labeled stored onsite pending off-site disposal.
- 4. The inside of the tanks will be rinsed with water and detergent. The rinse water will be captured and placed in the DOT drums.
- 5. The atmosphere inside each tank will be characterized using a Lower Explosive Level and Oxygen (LEL/O2) meter to ensure that no flammable/explosive vapors remain in the tank.
- 6. If vapors remain above the lower explosive limit, the tanks will be re-rinsed and the tank atmosphere will be re-characterized. This process will be repeated until no flammable/explosive vapors remain in the tank.
- 7. Each tank will be rendered in-operable, marked as clean and transported to the Nica facility at 248 Industrial Drive in Stockton, California for recycling.

PROCEDURES FOR HANDLING MISCELLANEOUS OILY SCRAP IN ROLL-OFF BIN

A roll-off bin containing scrap metal consisting of a truck radiator, various other vehiclerelated parts, and what appears to be a large rectangular fuel tank, is present at the Site. Oil adheres to some these parts and to the floor of the dumpster. The following procedures will be followed for managing this scrap metal:

- 1. Any fuel tanks in the existing roll-off bin will be segregated and handled according to the procedures for handling fuel tanks described above.
- 2. A new roll-off bin will be brought to the Site.
- 3. Scrap metal will be removed from the existing roll-off bin, cleaned, and placed into the new roll-off bin.
 - a. Any oil and/or free liquid present will be removed from the scrap material by draining it into a 55-gallon drum, or by placing it onto drip pans with absorbent material.
 - b. The accessible areas of the scrap items will be cleaned with an absorbent rag.
- 4. Free oil and/or other liquids will be removed from the existing roll-off bin.
 - a. To the extent possible, the material will be pumped into a 55-gallon drum.
 - b. Absorbent material will be applied to the base of the bin and then shoveled into drums or other DOT approved containers.
- 5. Both bins will be transported to the Nica facility at 248 Industrial Drive in Stockton California.
- 6. All drummed waste, including rags and absorbent material will disposed / recycled off-site in accordance with all applicable regulations.

WASTE DISPOSAL PROCEDURES

All waste will be managed by Evergreen Oil, Inc. (EPA ID# CAD982413262) as follows:

- Based on process knowledge, diesel or gasoline fuel will be presumed to be non-RCRA hazardous waste (California Waste Code 213, hydrocarbon solvents (benzene, hexane, Stoddard, etc.) and will be sent off-site under a hazardous waste manifest for recycling at an approved facility.
- Water from fuel tank rinsing will be presumed to be non-RCRA hazardous waste (California Waste Code 133, Aqueous solution with less than 10% total organic residues) and will be sent off-site under a hazardous waste manifest for recycling at an approved facility.
- Based on process knowledge, waste oil will be presumed to be non-RCRA hazardous waste (California Waste Code 221, Waste oil and mixed oil) and will be sent off-site under a hazardous waste manifest for recycling at an approved facility.
- Based on process knowledge, oily rags and absorbent will be presumed non-RCRA hazardous waste (California Waste Code 223, Unspecified oil-containing waste) and will be sent off-site under a hazardous waste manifest for recycling at an approved facility.



Danielle Stefani October 6, 2008

CLOSING

Nica is committed to ensuring a timely cleanup at this property in accordance with applicable rules and regulations. We look forward to working with you on this clean-up and welcome your assistance. Please don't hesitate to contact me at 510-450-6191, or <u>sab@weiss.com</u>, with any questions or further clarifications.

Sincerely, Weiss Associates

Dourne

Scott Bourne, P.E., C72817 Senior Project Engineer

Encl. Appendix A: Health and Safety Plan Appendix B: Spill Control Plan

Cc: Jerry Wickham, Jerry Wickham, PG, Senior Hazardous Materials Specialist, Alameda County Health Care Services Agency, Environmental Protection, 1131 Harbor Bay Parkway, Suite 250, Alameda, CA 94502-6577

SAB:skh

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APPENDIX A

HEALTH AND SAFETY PLAN

PROJECT HEALTH AND SAFETY PLAN

Hazardous Materials Cleanup for the Nica metals Facility at 6491 Southfront Road, Livermore, California

Weiss Project # 395-1864-2-1

1.0 ACRONYMS AND ABBREVIATIONS

- CFR Code of Federal Regulations
- PHSP Project Health and Safety Plan

SHSO Site Health and Safety Officer

2.0 PROJECT INFORMATION

This Project Health and Safety Plan (PHSP) is for work performed by Weiss Associates (Weiss) at Nica Metal Facility at 6491 Southfront Road, Livermore, California. The plan is prepared for the specific site conditions, purposes, tasks and dates. If these conditions change, this plan will be amended and reviewed by those named in Section 1.2. This PHSP is intended to meet the requirements of:

- 29 CFR 1910 Occupational Safety and Health Standards
- 29 CFR 1926 Safety and Health Regulations for Construction

2.1 Subcontractors

Subcontractors are required to comply with this PHSP or prepare their own equally or more stringent health and safety plan. In the case that Weiss subcontracted workers are on Site, the SHSO will review subcontractor health and safety plans to ensure all aspects of subcontractor responsibilities for this project are addressed.

2.2 Site Description

Site: NICA DMT, INC, 6491 Southfront Road, Livermore, CA 94551

Weather (forecast): Sunny, Temperature: 51 (min)-81(max) F, Precipitation: 0%.

Client Contact: Harold Mendoza, Contact Number: 925-443-6422

Site Contact: Charles Crocker, Contact Number: (510) 599-8933

Project Manager: Scott Bourne, Contact Number: 925-443-6422

2.3 Project Tasks

Work to be completed at Nica Metals Facility at 6491 Southfront Road, Livermore, California includes removing all hazardous materials and wastes from the site. Project tasks associated with this project include overseeing the following: emptying, cleaning, and removing the fuel tanks, managing oily metal scrap along with waste profiling and disposal.

Additional information regarding specific tasks can be found in Site Investigation and Cleanup Work Plan for the Nica Metals Facility (Weiss, 8/6/2008) and the Additions to August 5, 2008 Site Investigation and Cleanup Work Plan (Weiss, 10/6/2008)/

3.0 PROJECT PERSONNEL

Key personnel responsibilities are detailed in Section 2 of the Corporate Health and Safety Program (Weiss 2007). Personnel identified for this project are listed below.

Table 3-1.	Key Personnel		
Nam	e	Role	Phone Number(s)
Client – Nica Mo	etals, Inc	Harold Mendoza, Technical Support	Office: 209-234-4300 Mobile: 510-773-83714

Project Manager: Scott Bourne (Project	Office: 510-450-6191
	0111001010 100 0191
Management)	Mobile:
Health & Safety Program Manager: Agata	Office: 510-450-6119
Sulczynski	Mobile: 415-516-4972
Project Lead: Crocker Charles (Field operation	Office: (650)968-7000
supervisor)	Mobile: (510) 599-8933
Field Team Lead: Crocker Charles (Field	Office: (650)968-7000
operation supervisor)	Mobile: (510) 599-8933
SHSO: Crocker Charles (Field operation	Office: (650)968-7000
supervisor)	Mobile: (510) 599-8933
	 Health & Safety Program Manager: Agata Sulczynski Project Lead: Crocker Charles (Field operation supervisor) Field Team Lead: Crocker Charles (Field operation supervisor) SHSO: Crocker Charles (Field operation supervisor)

Other Personnel

Notes

4.0 HAZARD ASSESSMENT

This section discusses chemical, physical, and environmental hazards to workers on the site associated with the project tasks listed in Section 2.0.

4.1 Activity Hazard Analyses

Activity Hazard Analyses (AHAs) are provided for all anticipated activities to be conducted on Site and are included in Appendix A of this PHSP. [Electronic AHAs may be found at <u>M:\SAFETY\Corp_Health_Safety_Program\App_A_AHAs</u>. Each AHA should be reviewed and modified to reflect project-specific hazards and attached as Appendix A].

The following AHAs are included:

Table 4-1.	Activity	Hazard	Analyses
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<u>No.</u>	Activity		<u>No.</u>	Activity
01	Office		09	Soil Gas Sampling
02	Warehouse		10	Drilling, Including Soil Boring and Well
				Installation
03	Field and Geological Survey		11	Rig and Crane Operation
04	Well Survey	\boxtimes	12	Tank Demolition
05	Well Development		13	Treatment System Installation
06	Groundwater Sampling		14	Extraction System Operation and Maintenance
07	Storm Water Sampling	\boxtimes	01	Other: Emptying, removing, cleaning fuel tanks
08	Aquifer Testing	\boxtimes	O2	Other: Handling oily metal scrap

4.2 Physical Hazards

The following physical hazards may be encountered at the Site.



	Confined Space	\square	Heavy Equipment Operation		Traffic
	Cryogenic Materials	\boxtimes	Lifting Heavy Objects		Trenching
	Electrical	\boxtimes	Noise		Underground Utilities
	Excavation		Overhead Power Lines	\boxtimes	Uneven/Wet Surfaces (slips, trips,
					falls)
\square	Explosion/Fire	\boxtimes	Power and Hand Tools		Work over Water
	Fall Hazards		Radiation		Other (Explained below)

Heavy Equipment Operation: Emptying, cleaning and removing the fuel tanks. Transportation and disposal of waste.

Lifting Heavy Object: Emptying, cleaning and removing the fuel tanks.

Power and Hand Tools: Tank cleaning and transportation.

Explosive/Fire: Flammable gas in the tanks which will be removed by water and inert nitrogen gas.

4.3 Biological Hazards

The following biological hazards may be encountered at the Site. [list hazards —e.g., poison oak, cacti, brown recluse spider, bees/wasps, red/fire ants, scorpions, rattle snakes, dogs, etc.)

4.4 Chemical Hazards

The following hazardous materials may be encountered at the Site [include asbestos and LBP].

Table 4-2. Project S	Table 4-2. Project Site Hazardous Materials												
		In				Carcinogen							
Hazardous Material	Free Phase	Groundwater	In Soil	PEL/TWA	IDLH	yes/no							
Diesel	\boxtimes			300 ppm	600 ppm								
Unknown Oil	\boxtimes			N/A									
Gasoline	\boxtimes			100 ppm									
MTBE	\boxtimes			50 ppm									
Benzene	\boxtimes			1 ppm	500	Y							
Toluene	\boxtimes			100 ppm	2,00	Y							
Ethyl Benzene	\boxtimes			50 ppm	2,000	Y							
Xylenes	\boxtimes			100 ppm	900	Y							

Note: Material Safety Data Sheets (MSDS) for compounds listed above are provided in Appendix B.

These additional hazards may be present at the site:

Air concentrations may exceed 10% of the Lower Explosive Limit (LEL).

Air concentrations may exceed OSHA Permissible Exposure Levels (PEL) 8 hour Time Weighted Average (TWA) for the following substances:

Hazard Controls

All hazard controls identified in the AHAs should be followed. Additionally, the following HSPs apply:

Table 4-3. Applicable Health and Safety Procedures

	No.	<u>Title</u>		No.	Title
\boxtimes	01	Health and Safety Forms	\boxtimes	18	Personal Protective Equipment
\boxtimes	02	Employee and Subcontractor Training		19	Respiratory Protection
	03	Office Safety		20	Bloodborne Pathogen Exposure Control
	04	Ergonomics		21	Confined Space Entry Requirements
\boxtimes	05	Physical Hazards Management		22	Vats, Pans, and Tanks
\boxtimes	06	Manual Lifting		23	Trenching and Excavation



\boxtimes	07	Hand Tools Safety		24	Electrical Safety
	08	Ladder Safety		25	Control of Hazardous Energy
					(Lockout/Tagout)
	09	Biological Hazards Management		26	Fire Prevention and "Hot Work" Permitting
	10	Heat and Cold Stress Management	\boxtimes	27	Handling Drums and Containers
	11	Hearing Conservation		28	Site Control and Work Zones
	12	Process Safety Management		29	Safety and Health Signs and Labels
	13	Compressed Gases	\boxtimes	30	Spill and Discharge Control Plan
	14	Hazard Communication & Prop 65	\boxtimes	31	Decontamination Procedures
	15	Air Monitoring	\boxtimes	32	Site Specific Emergency Response Plans
	16	Asbestos		O1	Other: [Describe]
	17	Lead Based Paint		O2	Other: [Describe]

4.5 Air Monitoring

Based on Weiss HSP-15, air monitoring will not be required for project activities conducted at the Nica Metals Facility at 6491 Southfront Road, Livermore, California.

Air in the work area will be monitored at least:

	once per hour	once per ½ h	our	As material is ger	nerated		Other (Specify)	
Monito	pring equipment to be	used:						
	Organic Vapor Meter (PID/FID)		Combustible	Gas Indicator		Other		
	Color (Draeger) Tubes (to Attached Flow Chart)	Refer	Oxygen Indic	cator		Other		

5.0 PERSONAL PROTECTIVE EQUIPMENT

Weiss HSP-18 defines PPE requirements for various categories of hazards. The minimum level of PPE used for field activities shall be:

No:	ne 🔲	D	\boxtimes	Modified D		С		В		А	\boxtimes	Other (check PPE below)
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Minimal PPE required:

\bowtie	Steel-toed boots or shoes	\boxtimes	Chemical resistant outer gloves	\boxtimes	Hearing protection
\boxtimes	Hard hat		Cotton coveralls		Other (Specify)
\bowtie	Chemical-resistant inner gloves	\boxtimes	Safety glasses with side shields		Other (Specify)

Respiratory protection required:

Half Face	Full Face	Supplied Air	SCBA	

Respirator cartridges to be used: N/A

6.0 TRAINING

Weiss HSP-02 defines training requirements for typical field activities. Additional training may be required depending on project activities, as specified here. All project personnel must be trained on this PHSP. The following specific training topics will be covered prior to commencement of project activities.

Hazard Communication

Hazards and Protection Limited Training

40-Hour or HAZWOPER

Heavy Equipment and Forklift

California Illness and Injury Prevention Program.

Health Hazard (See section 6.2.11 of the HSP-02)

 \bowtie



\square	Hazardous Waste Supervisor Contingency Plan and General Emergency Response	\square	Competent Person First-Aid or CPR Providers/Bloodborne Pathogen
	Respirator Use and Maintenance		Other (Specify)

At minimum, one employee certified in first aid and CPR is assigned to be onsite for any project involving hazardous waste activities. This person will also be trained in blood-borne pathogens control.

7.0 MEDICAL SURVEILLANCE

Section 4.10 of the Corporate Health and Safety Program defines the medical surveillance requirements. Project personnel will undergo the following medical examinations prior to project commencement:

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8.0 MEETINGS

Safety meeting will be held to ensure that all field personnel and visitors are aware of the health and safety hazards at the site. A Safety Meeting Form (Appendix C) will be completed to reflect the topics covered and personnel attending such meetings. The following meetings are required for this project. [form location: <u>M:\SAFETY\Corp_Health_Safety_Program\App_C_Forms]</u>

\boxtimes	Project Kick-off Safety Meeting	Weekly Safety Meetings	Quarterly Safety Meetings
	Daily Safety Meetings	Monthly Safety Meetings	Other (specify)

9.0 EMERGENCY PROCEDURES

Appendix D provides an emergency evacuation map and a route map to the nearest medical facility, Kaiser Permanente, 3000 Las Positas Rd, Livermore, California (10 min from location). The facility map depicts locations of first-aid supplies, spill equipment, and other emergency equipment.

9.1 Communication

The name, telephone number, and location of police, fire, and other emergency response agencies will be posted on Site at all times.

Table 9-1. Emergency Response Contact Information

Emergency Services	
Ambulance	911
Fire Department	911
Police	911
Police, Non-Emergency	(510) 777-3333.
Local Emergency	(925) 243-2600
Poison Control	(800) 222-1222
Nearest Medical Facility	
Kaiser Permanente, 3000 Las Positas Rd, Livermore,	(925) 243-2600
California (10 min from location)	
[Emergency room direct line]	
Client Contacts : Harold Mendoza	(925) 443- 6422
Weiss Contacts	
Weiss PM	(510) 450-6191
Weiss HSPM	(510) 450-6119



Table 9-1. Emergency Response Contact Information

The following communication methods and/or equipment will be implemented during the project.

\boxtimes	Cell phones	Air horn	Car horns
\boxtimes	Hand signals	Facility alarm	Other

RECORD KEEPING

Health and Safety records, including field forms, will be retained in the project file. Applicable field forms are included in Appendix C. Records may also be:

Provided to the client	\boxtimes	Placed in a record repository	Other (specify)

10.0 APPROVAL

This PHSP has been reviewed and approved by:

	10/6/2008		10/6/2008
Charles Crocker	Date	Scott Bourne	Date
Site Health and Safety Officer		Project Manager	

11.0 REFERENCES

Weiss. 2007. Corporate Health and Safety Program. October.

Weiss. 2008. Site Investigation and Cleanup Work Plan for the Nica Metals Facility at 6491 Southfront Road, Livermore, California. October.

Weiss. 2008. Additions to August 5, 2008 Site Investigation and Cleanup Work Plan for the Nica Metals Facility at 6491 Southfront Road, Livermore, California. October.





FIGURE



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APPENDIX A

ACTIVITY HAZARD ANALYSES

ACTIVITY HAZARD ANALYSIS

ACTIVITY: Tank Demolition AHA Number: 12

ANALYZED BY: Sol Gutierrez DATE: October 2, 2007

DATE: _____

PRINCIPAL STEPS	POTENTIAL HAZARDS	RECOMMENDED CONTROLS
Mobilization to Site	Vehicle Hazards and Traffic	Vehicle operators will adhere to Weiss company vehicle policy (Section 7.12 of the Weiss Policy Manual, 2006).
Demolition of tanks using pneumatic jack-hammer	Exposure to fixed, removable and airborne radioactive contamination.	Personnel must be trained in accordance with the PHSP, SOPs, HSPs, and other supporting documents. Personnel will wear appropriate personal protective equipment (PPE) to prevent inhalation of, or skin contact with, any form of contaminant. A Control Entry Log form will be used for control of any work area involving contaminants. Use of engineering controls will be evaluated. Air monitoring in the area will be conducted to evaluate level of protection and upgrade or downgrade PPE as appropriate (with SHSO or designee approval). Air monitoring will be performed by a health and safety professional in accordance with the PHSP and appropriate HSPs.
	Compressed Air Hazards	Personnel shall be trained in the proper inspection and use of pneumatically powered equipment. All connectors between air hoses and between air hoses and equipment to be properly secured with retaining pins and whip-check devices.
	Flying Debris Hazards	Hard hats, steel toed boots and safety eye wear is required. Use of a facesheild may be necessary.
	Loud Noise Exposure	Use of hear protection devices required. Decibel meter to be used to monitor exposure levels.
	Lifting Heavy Objects	Personnel shall be trained in proper lifting techniques. Two or more people required for objects weighing greater than 75 lbs. Use of proper lifting equipment by trained personnel as instructed by SHSO. Inspect lifting equipment daily at a minimum.
	Heat/Cold Stress	Personnel shall be properly trained to identify signs and symptoms of heat/cold stress. Drinking water will be available. Work shifts will be designed appropriately for environmental conditions.



APPENDIX B

HEALTH AND SAFETY PROCEDURES



APPENDIX C

SAFETY FORMS



SAFETY MEETING FORM

HEALTH AND SAFETY FORM

Project		Facility	
Date	Time		Project Number
Customer	Address		
Specific Location			
Type of work			
Chemicals Used			
	Safety Topi	cs Presented	
Chemical Hazards			
Physical Hazards			
Protective Clothing/Equipment			
Special Equipment			
Emergency Procedures			
Hospital/Clinic			Telephone
Location			
Other			
Conducted by		Signature	
SHSO		Project Manager	



NAME PRINTED	SIGNATURE



APPENDIX D

HOSPITAL ROUTE MAP



Directions to 6491 Southfront Rd, Livermore, CA 94551 4.3 mi – about 8 mins





Kaiser Permanente Livermore Medical Offices: General Information 3000 Las Positas Rd Livermore, CA 94551	
1. Head west on Las Positas Rd toward Arroyo Plaza	go 0.6 mi
About 1 min	total 0.6 mi
 P 2. Turn right at J2/N Livermore Ave	go 0.2 mi
About 1 min	total 0.8 mi
3. Turn right to merge onto I-580 E toward Stockton	go 2.6 mi
About 3 mins	total 3.3 mi
4. Take exit 55 to merge onto S Vasco Rd	go 0.4 mi
About 1 min	total 3.7 mi
1 5. Turn left at Preston Ave	go 240 ft
About 1 min	total 3.8 mi
6. Turn left at Southfront Rd Destination will be on the right About 1 min	go 0.5 mi total 4.3 mi
6491 Southfront Rd Livermore, CA 94551	

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

Map data ©2008 Tele Atlas



APPENDIX B

SPILL CONTROL PLAN



HSP-30. SPILL AND DISCHARGE CONTROL

HEALTH AND SAFETY PROCEDURE

1.0 PURPOSE

This Health and Safety Procedure (HSP) establishes the methods and responsibilities associated with control of spills and accidental discharges. This procedure is applicable to employees and subcontractors.

- 2.0 **REFERENCES**
- 2.1 Corporate Quality Assurance Program (QAP)
- 2.2 Corporate Health and Safety Program (Program)
- 2.3 29 CFR 1910, Occupational Safety and Health Standards
- 2.4 29 CFR 1926, Safety and Health Regulations for Construction
- 2.5 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response
- 2.6 29 CFR 1926.65, Hazardous Waste Operations and Emergency Response

3.0 **DEFINITIONS**

3.1 Employee

Any person employed by Weiss.

4.0 **RESPONSIBILITIES**

4.1 Project Manager (PM)

The PM is responsible for the implementation of this procedure.

The PM, in consultation with the Health and Safety Program Manager (HSPM), is responsible for identifying all training requirements pertinent to project activities. The PM is responsible for ensuring all personnel working on a project have received the required training. The PM shall ensure that provisions of applicable documents and regulations are followed.

4.2 Health and Safety Program Manager (HSPM)

The HSPM is responsible for the issuance, revision, maintenance, and compliance of this procedure.

4.3 Site Health and Safety Officer (SHSO)

The SHSO is responsible for ensuring and verifying that this procedure is implemented in the field.

4.4 Employees

All employees are responsible for following this procedure as it applies to their work.

5.0 SAFETY PRECAUTION/PREREQUISITES

Prior to conducting this task all applicable personnel shall be familiar with this HSP, and with appropriate sections of the QAP.

Personnel conducting this task shall be aware of hazards and conditions and will wear appropriate personal protective equipment (PPE), as required.

Instruments required to conduct this task shall be properly calibrated in accordance with the manufacturers' requirements, and shall be visually inspected prior to each use. Personnel will be trained in proper operation of equipment and instruments.

This procedure provides contingency measures for potential spills and discharges from handling and movement of hazardous and radioactive materials and waste and possibly contaminated soil and ground water.

5.1 General

Any area used for storage of fuels, lubricants or other construction consumables will be appropriately bermed, diked and/or otherwise contained, so as to prevent spills onto uncontaminated soil. If a spill occurs on uncontaminated soil, appropriate regulatory agencies will be notified as required, and actions will be taken to control, contain, and clean up the spill.

A copy of this procedure will be posted in plain view of any activities where spills may occur.

5.2 Project-Specific Plans

Project-specific spill and discharge control plans (SDCPs) will be developed where there is potential for spills of hazardous and radioactive materials and waste to occur. The following outline will be used in developing SDCPs:

- Introduction
- References
- Problem Definition/Purpose
- Organization and Responsibilities
- General Spill Response Procedures
- Spill and Discharge Control of Extracted Ground Water
- Dust and Runoff Control from Excavated Soil

- Notification of Spills and Discharges
- Inspections
- Records
- Reports

5.3 General Spill Response Procedures

In the event of a spill, the following actions will be taken, as necessary:

- Alert all personnel in the vicinity. Advise them to stay upwind or evacuate, as appropriate.
- Stop the source of the spill, if possible, and without undue risk of personal injury.
- Notify the facility or local fire protection service and report the location and status of the spill.
- Keep out of low areas.
- Take samples for analysis, if necessary, to determine that cleanup is adequate.
- Protect storm drains, sanitary sewers, and other routes that the hazardous material may travel and reach public sanitary systems and natural water resources.
- Identify the hazardous material released and review its Material Safety Data Sheet.
- Keep combustibles away from spilled materials.
- Use water spray or foam as appropriate and compatible with spilled material to reduce vapor or dust generation.
- Remove or retrieve any discharged liquid or sludge.
- Provide first aid and/or decontaminate contaminated personnel.

5.4 Notifications of Spills and Discharges

If in accordance with local, state or Federal regulations, a spill or discharge of fuel or other hazardous substance is reportable and/or human health or the environment are threatened, Weiss will provide verbal notifications to the local emergency authority (dial 911), National Response Center (800-424-8802 or 202-426-2675), and the appropriate state Office of Emergency Services (OES) (800-852-7550 within California). Federal and state OSHAs will be contacted if personal injuries are caused by the spill, in accordance with Weiss Accident Reporting requirements. The PM or other senior Weiss official will be contacted to determine requirements for written notification.

5.5 Notification of Releases During Transport

State highway patrols are to be contacted (dial 911) if there is a release of a hazardous substance or waste during transportation from the project to other locations. The National Response Center must also be notified if the release results in:

• Death of an individual;



- Injuries resulting in hospitalization;
- Property damage in excess of \$50,000; or
- Spilling of radioactive waste.

Follow-up written reports must be filled with the DOT using DOT Form F 5800.1 within 30 days. Each state also has requirements for filing written reports.

5.6 Releases into Waterways

Releases into waterways of oil in quantities at or above 42 gallons of petroleum products or other hazardous substances at or above their Reportable Quantities (RQs) under Superfund, RCRA, or state hazardous waste laws must be reported to the US Coast Guard and the state Office of Emergency Services.

6.0 **RECORDKEEPING**

All records generated to comply with this HSP will be maintained in accordance with the Weiss record retention policy or applicable laws and regulations; whichever require a longer retention period (QAP).

7.0 ATTACHMENTS

None.

A form referenced or attached to this HSP may be replaced with a substitute form, with the approval of the HSPM, if the substitute form contains equivalent information as the referenced form.