

Company

CHEMICAL PROCESSORS, INC.

Northern California Division

90 FEB 26 PM 12: 45

February 22, 1990

Alameda County Dept. of Environmental Health Hazardous Materials Division 80 Swan Way #200 Oakland, California 94621

Attn: Scott Ceery

Re: Chevron Service Station #9-1924

5269 Crow Canyon Road

Castro Valley, CA

This letter is notification that Chemical Processors, Inc. is operating a Transportable Treatment Unit (TTU) at the above captioned site. The TTU is a groundwater extraction and treatment system, where Chempro conducts sampling activities and maintains system operations.

Enclosed please find a copy of the Contingency Plan for the TTU. This plan will be implemented immediately whenever there is a fire, explosion or release of hazardous waste. Figure E1-1 shows the access routes to the service station and the location of the Transportable Treatment Unit on the service station property.

In the event of an emergency, the local authorities will be notified. If any additional information is needed, please feel free to contact me at (415)524-9372.

Sincerely,

CHEMICAL PROCESSORS, INC.

Felices A R

Felicia A. Rein

Environmental Technician



CHEMICAL PROCESSORS, INC.

Northern California Division

April 3, 1990

Alameda Cty Dept Env Health 80 Swan Way #200 Oakhand, CA 94621

RE: CHEVRON SERVICE STATION NO. 9-5607, LOCATED AT 5269 CROW CANYON RD., CASTRO VALLEY, CALIFORNIA 94546

Attached is a revised Page 4 of the Contingency Plan for the groundwater treatment system located at Chevron Service Station #9-5607, at the above referenced address. Please remove the old Page 4 and replace it with this revised page.

If you have any questions, please contact me at (415)524-9372.

Sincerely,

CHEMICAL PROCESSORS, INC.

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Felicia Rein

Environmental Technician

cc: Mr. John Randall (Chevron)

Enclosure

SECTION E

TRANSPORTATION TREATMENT UNIT CONTINGENCY PLAN

Revised February 22, 1990

SECTION E: CONTINGENCY PLAN

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PREFACE

CAC Title 22, Section 67140

The objectives of the Contingency Plan are to minimize and prevent hazards to human health or the environment from fires, explosions or any unplanned, sudden or non-sudden release of hazardous wastes or hazardous waste constituents to air, soil or surface water. This plan will be implemented immediately wherever there is a fire, explosion or release of hazardous wastes. This plan also applies to the management of hazardous materials in which a release may require preventative and responsive actions on the part of Chevron. A current copy of this plan is kept at the transportable treatment unit (TTU) at all times and is provided to the appropriate State and local authorities.

E1.0 GENERAL FACILITY DESCRIPTION

E1.1 Facility Identification

Transportable Treatment Unit Owner:

Chevron USA Inc.

PO Box 5004

San Ramon, CA 94583-0804

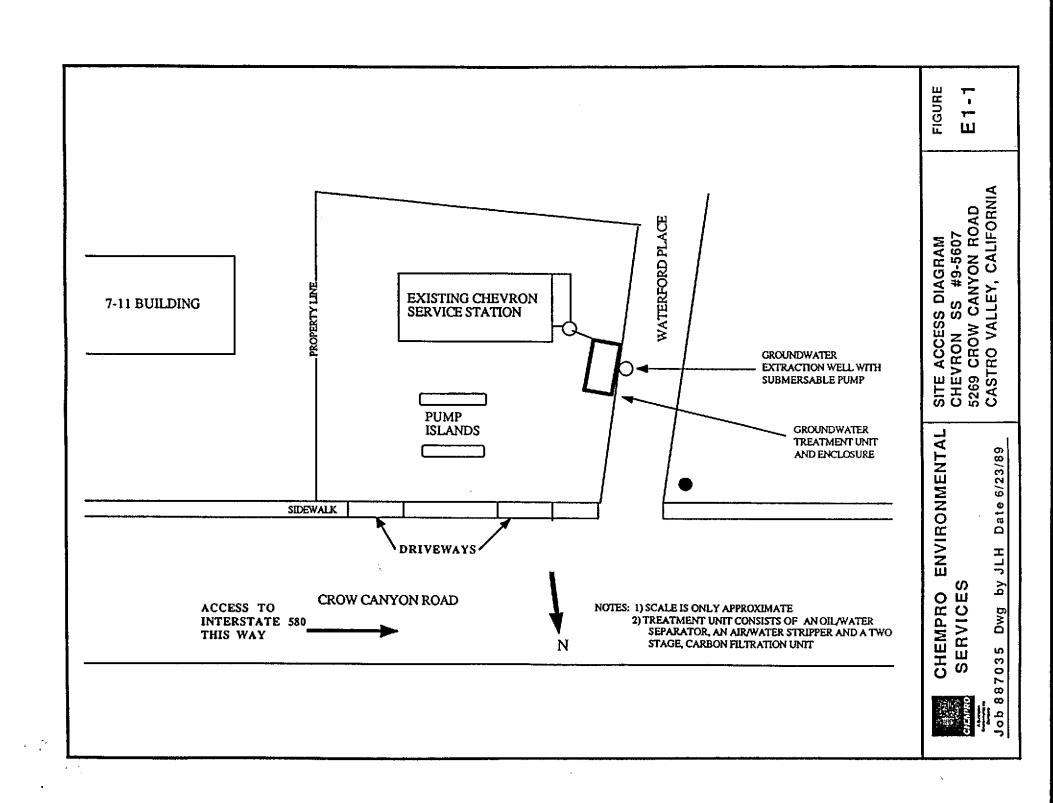
Transportable Treatment Unit Operator:

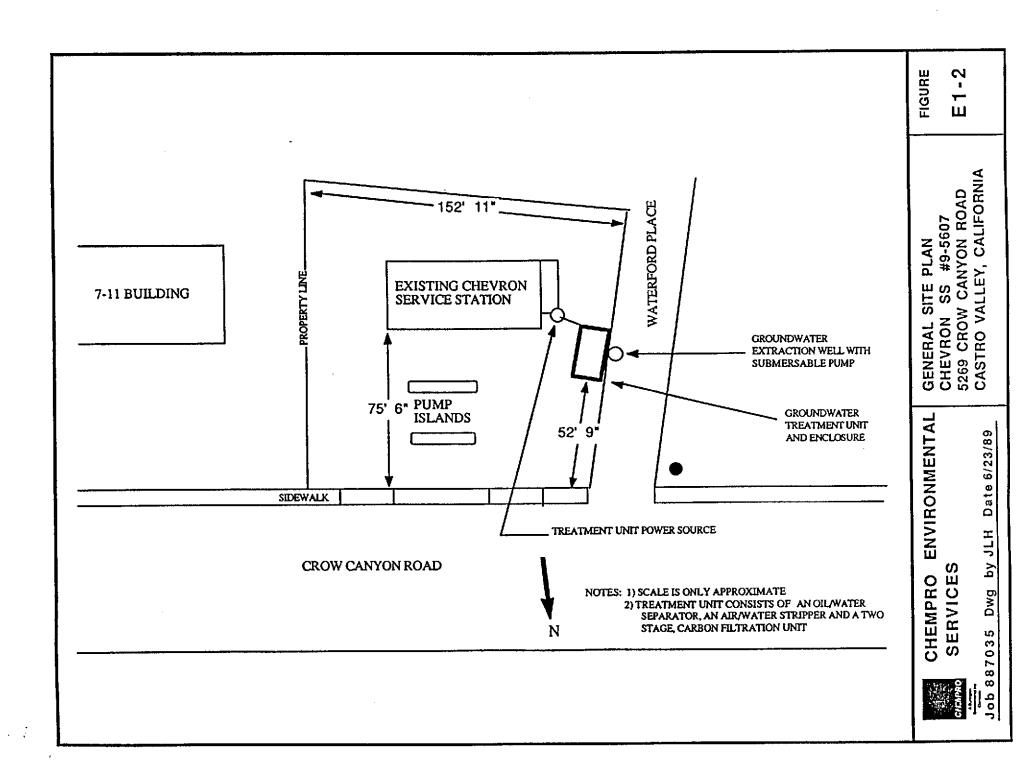
Chemical Processors, Inc. (Chempro)
950 Gilman St., Suite B
Berkeley, CA 94710
(415)524-9372

Location

The transportation treatment unit is located at 5269 Crow Canyon Road, Castro Valley, California. Vehicles transporting hazardous waste from the facility leave the site along Crow Canyon Road and can proceed west to access Highway 580.

Figure E1-1 shows the access routes to the Chevron Service Station and the location of the transportable treatment unit on the service station property.





E2.0 FACILITY OPERATIONS

The transportable treatment unit operates 24 hours per day seven days per week. The entire TTU is surrounded by an eight-foothigh chain link fence. All gates are kept closed and locked. Personnel inspect the facility at least monthly in accordance with Section C, Inspection Schedule.

The TTU will automatically shut down if there is an equipment malfunction. The following three phone numbers will be automatically dialed:

- (415) 524-9372......Chempro, Red Blevins
- (415) 881-5568......Larry Miller's home
- (415) 842-9525......Gordon Davitt's office

E3.0 EMERGENCY COORDINATOR RESPONSIBILITIES

The Emergency Coordinator (EC) (or his/her designee when the emergency coordinator in unavailable) is responsible for coordinating emergency response procedures in the event of imminent or actual fires, explosions, unplanned releases, spills or other emergency situations occurring at the facility. The EC's duties include the following:

E2.0 TTU OPERATIONS

The transportable treatment unit operates 24 hours per day seven days per week. The service station is illuminated by facility-wide outdoor lighting.

E3.0 EMERGENCY COORDINATOR RESPONSIBILITIES

The Emergency Coordinator (EC) (or his/her designee when the emergency coordinator in unavailable) is responsible for coordinating emergency response procedures in the event of imminent or actual fires, explosions, unplanned releases, spills or other emergency situations occurring at the facility. The EC's duties include the following:

- identify and assess the character, exact source, severity and aerial extent of any released material(s) involved in the situation;
- assess potential hazards to human health or the environment:
- initiate the Contingency Plan, if appropriate, and evacuation of the facility if necessary;
- direct containment and control of the released material;
- notify state or local emergency agencies, as needed;
- notify the State Office of Emergency Services;
- initiate appropriate clean-up operations.

The EC is thoroughly familiar with all aspects of the Contingency Plan and all operations and properties of wastes handled, the location of all records within the TTU in accordance with CAC Title 22, Section 67144.

The Primary or an Alternate Emergency Coordinator will be at the facility or on call at all times during both operational and non-operational hours. The primary and alternate EC can be reached by telephone. Table E3-1 lists the names, addresses, office and home telephone numbers of the Chevron's Primary Emergency Coordinator and Alternate in the order in which they assume Emergency Coordinator responsibilities.

The TTU will automatically shut down if there is an equipment malfunction. The following three phone numbers will be automatically dialed:

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(415) 522-3512

(415) 842-9525

Chempro, Red Blevins

Red Blevin's home

Gordon Davitt's office

TABLE E3-1. EMERGENCY COORDINATORS, CHEVRON FACILITY

EMERGENCY COORDINATORS TELEPHONE NUMBERS

EVENING

HOME ADDRESS

Primary

1. Red Blevins (415)524-9372 (415)522-3521

1001 San Antonio

Alameda, CA

Title: Manager, Chempro

<u>Alternate</u>

2. Chevron Maintenance Dispatch (800)772-2415 (800)772-3301

E4.0 IMPLEMENTATION OF THE CONTINGENCY PLAN AND EMERGENCY PROCEDURES

Where human health or the environment are threatened, the following emergencies would call for the implementation of the Contingency Plan in accordance with CAC Title 22, Section 67140:

- a. Fire/explosion anywhere on premises.
- b. On-site and off-site releases of hazardous wastes.
- c. The occurrence of natural disasters.

Listed below are more detailed examples of the emergency incidents described above.

a. Fire/Explosion

- A fire in which the use of water or water and chemical fire suppressant could result in contaminated runoff.
- A fire which causes the release of toxic fumes.
- A fire which spreads and could possibly ignite stored materials in other locations on site.
- A fire which could cause heat-induced explosions of materials/chemicals on site. The potential for explosion poses hazards of flying fragments, ignition of other hazardous materials and their release.

b. Material Release

 A sudden or non-sudden release which poses a threat to human health or the environment outside the facility

- or is an uncontrolled release of a reportable quantity of a hazardous substance.
- A release on site which has been contained yet the potential exists for contamination of soil, surface or groundwater.
- A release which cannot be contained on site, resulting in off-site soil or surface water or potential groundwater contamination.
- A release of gas to the air originating from an explosion of materials.

c. Natural Disaster

- A release or potential for release of hazardous materials caused by earthquake or severe flooding conditions which damage equipment, foundations or structures.
- A release or potential for release of hazardous materials caused by a severe storm involving high velocity winds or lightning which damage or overturn the unit.

E4.1 <u>Employee Response</u>

Any employee, when faced with an actual or imminent emergency, will first attend to his safety. Then, if it is safe to do so, he will attend to other employees requiring immediate assistance. The employee will also notify all facility personnel of the need for assistance.

In all emergency situations (regardless of size or extent) the employee involved in or discovering the situation will contact the Emergency Coordinator (EC) and provide information as to the location, nature and extent of the incident. The names, addresses and telephone numbers of the Primary and Alternate Emergency Coordinators are found in Table E3-1.

E4.2 Emergency Coordinator Response

The EC will immediately assess the situation to determine the appropriate emergency response actions including implementation of the Contingency Plan where human health or the environment are threatened. The EC will evaluate the severity and nature of the incident, and the character, source, quantity and extent of the released materials will be identified. If necessary, the EC will contact outside emergency service providers. Neighboring facilities/personnel who may be in danger will be notified. The notification of facilities/personnel who may be in danger will be determined by the local fire department and the EC.

In the event of any emergency (regardless of size or extent) the EC will contact Chevron's Maintenance Dispatch and Chempro and, as required, appropriate local, state and federal agencies will be notified.

The selection of appropriate response actions will depend on the consideration and assessment of the following factors:

- a. The severity and nature of the incident; fire, explosion or material release.
- b. The potential of severe consequences; what is the location of the incident and to what extent might other areas become involved; are persons off site in danger; will surrounding property be damaged or contaminated; is there a threat to surface and groundwater?
- c. The current weather conditions; temperature, wind direction and velocity and how response activities might be affected.

Identification of the character, exact source, amount and aerial extent of the released materials can be made through the following sources of information:

- a. Eyewitness accounts; employee discovering emergency.
- Visual inspection; areal extent, noted fumes, odors, reactions.
- c. Source; origin of leak.
- d. TTU module involved; type of waste treated.
- e. Location of incident.

A sampling and analysis plan to quantify the extent of contamination and associated extent of clean up will be initiated

if identification of the released material cannot be made from the above sources of information.

E4.3 Containment and Control of Emergencies

The sections which follow discuss emergency response procedures to minimize possible impact of emergency incidents on human health or the environment. These containment and control procedures may not entail the complete implementation of the Contingency Plan. Emergency response procedures are described for the containment and control of emergency situations including injured or endangered employees (Section E4.3.1), fires and explosions (Section E4.3.2), spills and releases (E4.3.3), flood conditions (Section E4.3.4).

The EC will commit all necessary resources of the company and may also call a contract clean-up service to assist in the control, containment and clean up of a release. The EC will coordinate the activities of the emergency response agencies.

Section E6.0 lists the type, location and description of the emergency equipment maintained at the facility. Figure E4-1 shows the locations of the facility's emergency and fire control equipment.

E4.3.1 Injured or Endangered Employees

- Alert others who may be endangered, call for backup.

- Use appropriate protective clothing and equipment.
- Apply first aid; first aid kits are located in the TTU and Chempro trucks.
- Phone 911 if ambulance is needed.
- Immediately notify EC (Table E3-1).

E4.3.2 Fires and Explosions

- Shout "FIRE" warning.
- Alert others who may be endangered , call for back up.
- Cut off source, close valves, shut down pumps/equipment.
- Use appropriate protective clothing and equipment.
- Control small fires with extinguishers located at the TTU (Figure E4-1).
- Phone 911.
- Immediately notify EC (Table E3-1).
- Attempt to contain spills or runoff by use of absorbent material and diking material. Plug sewer and storm system drains.
- Remove or isolate incompatible wastes, containers and other materials away from fire when possible.

E4.3.3 Spills and Releases

Loading Hazardous Waste - Filled Drums Spill

- Alert others who may be endangered , call for back up.
- Cut off source, close valves, shut down pumps, eliminate ignition sources.
- Immediately notify EC (Table E3-1).
- Use appropriate protective clothing and equipment.
- Attempt to contain spills or runoff by use of absorbent material and diking.
- Remove or isolate incompatible wastes from the affected area when possible.

Sump Leak

- Alert others who may be endangered , call for back up.
- Cut off source to sump, close valves, shut down pumps, eliminate ignition sources.
- Immediately notify EC (Table E3-1).
- Use appropriate protective clothing and equipment.
- Provide for containment of spill if containment berms have been damaged.
- Remove or isolate incompatible wastes from the affected area when possible.

- After quantity and character of spill has been determined, transfer remaining contents of leaking sump to an appropriate storage drum.
- Assess reason for leak.

Piping Leaks or Ruptures

- Alert others who may be endangered, call for back up.
- Cut off flow, close valves, shut down pumps.
- Use appropriate protective clothing and equipment.
- Use absorbent materials and diking to contain spill and prevent exposure to incompatible materials.
- Immediately notify EC (Table E3-1).
- Remove or isolate incompatible wastes from the affected area when possible.
- After quantity and character of spill has been determined, transfer spilled material in pipes or sumps to an appropriate storage drum.

Non-Permitted Discharge to Sewer

- Cut off flow, close valves, shut down pumps.
- Immediately notify EC (Table E3-1).
- Record event, noting quantity, source and duration of release.
- Contact sewer district as required by permit.

E4.3.4 Flood Conditions

- Alert others who may be endangered, call for back up.
- Use appropriate protective clothing and equipment.
- Eliminate ignition sources, shut down operations.
- Immediately notify EC (Table E3-1).
- Use diking to prevent flooding of the TTU.

The EC will take all necessary and reasonable steps to ensure that a secondary release, fire or explosion does not recur after the initial incident.

If the facility stops operations in response to a fire, explosion or release, the EC will monitor pressure build up, or leaks and ruptures in valves, pipes or other equipment until the emergency has ended and normal operations can resume.

The EC together with the assistance of Chevron's Marketing
Department will evaluate the incident to understand why and how
the incident occurred and what future modifications can be
initiated to prevent a recurrence of the same or similar
situation. Evaluations will include equipment design,
operational procedures, response tactics and personnel safety.

E4.4 Notification

The EC will contact Chevron's Maintenance Dispatch or Chempro's manager in the event of any emergency regardless of size or The EC will supply specific information as to the type, extent. quantity and location of released material. Chevron's Maintenance Dispatch and/or Chempro together with the EC will evaluate this information and if it is determined that the facility has had a hazardous substance release, fire or explosion which could threaten human health or the environment outside the facility or is an uncontained release of a reportable quantity of a hazardous substance, the proper local and state agencies will be immediately notified by Chevron's Maintenance Dispatch. EC will immediately contact these agencies if it is readily determined that the emergency threatens human health or the environment outside the facility. The name and phone numbers of these agencies are listed below.

- a. State Office of Emergency Services (916) 427-4341
- b. Local Fire Department (415) 881-8181
- c. Local Police Department (415) 351-2020
- d. National Response Center (800) 852-7550
- e. Regional Water Quality Control Board, if potential for release to water, soil or ground water.

(415) 464-1255

f. AQMD, if release to air exceeds permit limitations (415) 771-6000

- g. Alameda County Dept. of Environmental Health (415)271-4320
- h. Sewer District, if discharge exceeds permit limits and if required by the permit (415) 537-0757

Specific information concerning the spill will need to be provided to the agencies. An example Emergency Information Reporting Form is located in Appendix E-1. Copies of this form are located at the TTU and with Chempro Regulatory Affairs Department.

Notification to the Office of Emergency Services will include the following:

- Name and phone number of reporter,
- Name and address of facility,
- Time and type of incident (eg. fire, release),
- Name and the quantity of material(s) involved to the extent known,
- Extent of injuries, if any, and
- Possible off-site hazards to human health or the environment outside the facility.

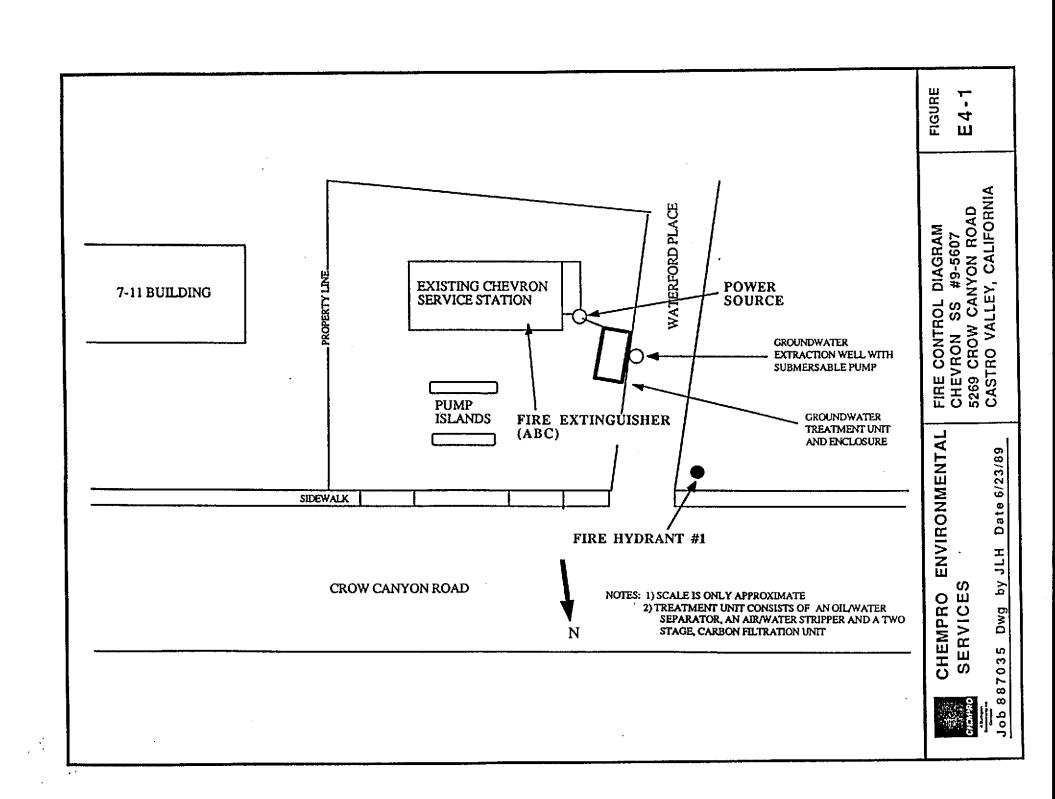
Notification to Local and other State agencies will further include, to the extent known:

Duration of the release,

- Medium or media into which the release occurred,
- Any known or anticipated acute or chronic health risks associated with the emergency and, where appropriate, advice regarding medical attention necessary for the exposed individuals.
- Proper precautions to take as a result of the release, including evacuation, and
- Names and telephone numbers of person(s) to be contacted for further information.

E5.0 EMERGENCY EQUIPMENT

Table E5-1 lists the type, location, and description of emergency equipment maintained on site at the Chevron TTU. Figure E4-1 shows the locations of the TTU's emergency equipment and fire control equipment. Quantities of emergency equipment listed in Table E5-1 represent minimum stock quantities. Procedures for regular inspection of emergency equipment are described in Section C, Inspection Schedule.



• TABLE E5-1. EMERGENCY EQUIPMENT, CHEVRON TTU

		DESCRIPTION/
EQUIPMENT	LOCATION	USE/CAPABILITIES
Absorbent Materials	Site adjacent to TTU	 free liquid absorption, diking, spill containment
- absorb compound	Site adjacent to TTU	- "perlite" - 35 lb. bags, stock 30 total
- 3M pads	Site adjacent to TTU	- oil absorbent, water repellant - stock 100 total
Overpack Drums	Chempro response trailer	contain leaking drums85 galstock 10 total
Spill Response Kits	Adjacent to TTU	 clean up small spills, drips drum containing absorbent and shovel 1 total throughout facility
Hand Tools	Chempro response trailer	
- brooms	Chempro response trailer	- clean up - hand and push, stock 6 total
- shovels	Chempro response trailer	- spreading, digging - spade and flat blades, stock 10 total
- squeegees	Chempro response trailer	- corral free liquids - stock 4 total
- scrapers	Chempro response trailer	- scrapping, chipping - stock 4 total
- wheelbarrow	Chempro response trailer	 hauling, consolidation stock 1 each
- visquine (plastic)	Chempro response trailer	 protection from exposure appx. 32 x 100 ft. rolls stock 1 roll
- barrier tape	Chempro response trailer	 sealing off areas high visibility, printed with caution warning stock 500-1000 feet
Drip Buckets	Adjacent to TTU	contain small drips, leaks2 to 5 gal5 total

TABLE E5-1. EMERGENCY EQUIPMENT, CHEVRON TTU

EQUIPMENT	LOCATION	DESCRIPTION/ USE/CAPABILITIES
Gloves	Chempro response trailer	 protection from exposure PVC, nitrile stock 10-15 pair total
Coveralls	Chempro response trailer	 protection from exposure tyvek, disposable stock 5-10 pair
Boots	Chempro response trailer	 protection from exposure steel toed, rubber stock 2-4 extra pair
Rain Suits	Chempro response trailer	protection from exposurePVC, jackets and pantsstock 2-4 extra suits
Hearing Protection	Chempro response trailer	- foam plug type - stock 1 box
Goggles	Chempro response trailer	- stocks 5-10 pairs
First Aid Kits	Chempro response trailer	- on-site first aid, minor injuries
Fire Hydrants	1/4 Block west on Crow Canyon Road	water for fire controlmaintained by Cityof Castro Valley
Fire Extinguishers	Adjacent to TTU	 portable, multi and specific purpose size and type; A = ordinary combustible, B = flammable liquids, C = electrical,
#1	Adjacent to TTU	20 lb. ABC
Emergency Lighting	Chempro response trailer	- AC/battery lights

· PAGE 3 of 3

TABLE E5-1. EMERGENCY EQUIPMENT, CHEVRON TTU

EQUIPMENT	LOCATION	DESCRIPTION/ <u>USE/CAPABILITIES</u>
Electrical Control Panels	Adjacent to TTU	- circuit breaker panels for TTU electrical system and equipment
Automated Phone Dialing System	TTU	- Phone system which dials three numbers if equipment shuts down
Shutdown and Overflow Switcher	ττυ	 Shuts down equipment if pump or other operating equipment mal- functions. Prevents sump over- flow.

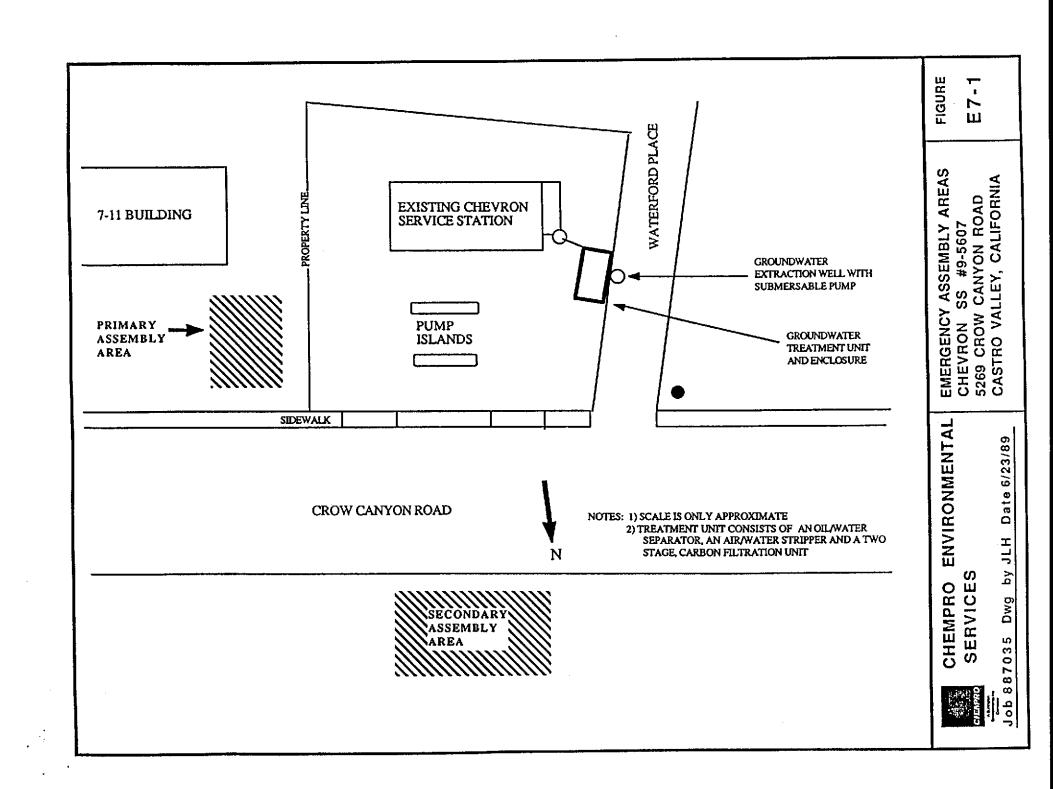
E6.0 POST EMERGENCY ACTIVITIES

Once the emergency situation has ended, the EC will initiate the proper clean up, storage and treatment of the released material and residues. This will occur as soon as possible in order to minimize potential danger to human health or the environment.

Spill residues and clean up materials such as absorbents, diking material and protective clothing will be consolidated or off-site disposal. Water from fire control or flooding will be contained, collected, analyzed and removed for storage/treatment if contaminated.

The EC is responsible for initiating and overseeing postemergency equipment replenishment, maintenance and inspection

All equipment used during the emergency will be decontaminated (if necessary) and readied for future use. Decontamination will be done by steam cleaning and/or triple washing with appropriate cleaner. All rinsate will be contained and tested to determine appropriate disposal. Fire extinguishers will be recharged and personnel protective equipment and absorbent materials replenished.



E7.0 EVACUATION PLAN

In the event a fire or release of a hazardous material could endanger the lives of persons in and outside the facility premises, evacuation of the facility will occur according to procedures outlined below. Maps indicating the exit routes and assembly areas are posted outside of the unit.

- The EC coordinates all evacuation procedures.
- All personnel will be immediately notified of an emergency requiring evacuation to the primary or secondary assembly area.
- Neighboring facilities/personnel will be notified if necessary by Chevron personnel or by emergency response personnel (e.g. police, fire).
- The primary assembly area is across at the 7-11 parking lot, east of the facility; if this area is downwind of potentially hazardous emissions, the secondary assembly area is north of the facility across Crow Canyon Road (Figure E7-1).
- At the assembly area, the EC or designee will account for all persons.

- Call 911 Emergency.
- Notify neighboring facilities/personnel if necessary.
- The local fire department in conjunction with the EC will determine the need to evacuate beyond the area of the service station.
- No one will re-enter the TTU area during evacuation conditions without the permission of the EC and without the proper protective clothing and equipment.
- Approval of the safe re-occupancy of the TTU area will be determined by the EC in consultation with the responding emergency service agencies.

E8.0 ARRANGEMENT WITH LOCAL AUTHORITIES

Pursuant to Title 22, Section 67126, Chevron or Chempro will contact local emergency agencies to familiarize police, fire departments, emergency response teams and the local office of Emergency Services regarding the contingency plan for the TTU.

E9.0 AMENDMENTS TO CONTINGENCY PLAN

The Contingency Plan will be reviewed and amended for the following reasons:

- a. Applicable regulations or the TTU permit are revised.
- b. The plan fails in an emergency.
- c. The TTU changes (in its design, construction, operation, maintenance, or other circumstances) in a way that materially increases the potential for fires, explosions, or releases of dangerous waste or dangerous waste constituents, or in a way that changes the response necessary in an emergency.
- d. The list of Emergency Coordinators changes.
- e. The list of emergency equipment changes.

Copies of the updated Contingency Plan will be distributed to the emergency agencies, and Chevron personnel responsible for its implementation. A master distribution list is maintained at the Chevron Marketing Department for verification that each agency or facility has the most recent version of the plan.

APPENDIX E-1

EXAMPLE EMERGENCY INFORMATION REPORTING FORM

CHEMICAL PROCESSORS EMERGENCY INFORMATION REPORTING FORM

NAME AND ADDRESS OF FACILITY	NAME OF REPORTER AND PHONE # WHERE REPORTER MAY BE LOCATED		
NAME AND PHONE NUMBERS OF ADDITIONAL CONTACTS FOR INFORMATION			
DATE	TIME		
TYPE OF INCIDENT (SPILL, GAS RELEASE, ETC.)	MEDIUM INTO WHICH RELEASE OCCURRED (WATER, AIR, SOIL, ETC.)		
IDENTIFICATION OF MATERIAL			
IS MATERIAL AN EXTREMELY HAZARDOUS SUBSTANCE? (REF: APPX A AND B, 40 CFR 355)	QUANTITY AND DURATION OF RELEASE		
POSSIBLE HAZARDS TO THE ENVIRON			
ASSOCIATED ACUTE OR CHRONIC HE	ALTH RISKS (KNOWN OR ANTICIPATED)		
PRECAUTIONS TO BE TAKEN			
EXTENT OF INJURIES			
OTHER COMMENTS			