Appendix B-5

PCB SPCC Plan

Updated June 2015

PCB PROCESSING FACILITY
SPILL PREVENTION, CONTROL
AND COUNTERMEASURES PLAN

June 2015

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APPENDICIES

APPENDIX 1 SPCC PLAN REVIEW FORM

APPENDIX 2 US ECOLOGY SITE MAP

APPENDIX 3 PCB PROCESSING BUILDING AND TANK FARM AREA DRAWING

APPENDIX 4 INSPECTION CHECKLIST FORMS

1. OIL SPILL OR RELEASE NOTIFICATION

The following notification must be made in the event of a PCB-containing waste spill or release:

1. Notify a supervisor, manager, or emergency coordinator **immediately** unless notification within that time frame is impractical because of the emergency situation.

EMERGENCY COORDINATOR	NAME	STREET ADDRESS	HOME PHONE
Primary Coordinator	Robert Marchand	1225 A Avenue North Beatty, Nevada 89003	775-553-2367 702-280-2596-cell
First Alternate	Daniel Church	3100 Prairie Ave. Pahrump, NV 89048	775-990-9826-cell
Second Alternate	Josue Partida	901 2nd St. Beatty, Nevada 89003	775-537-5095-cell
Third Alternate	John Dyer	1100 N. 1st Avenue, Apt B-21 Beatty, NV 89003	775-420-2197-cell
Health & Safety Manager	Ingeborg Thomas	1100 A Avenue Unit B 5 Beatty, NV 89003 Alt (Fri – Sun) 6548 West Diablo Dr. Las Vegas, NV 89118	702-485-0787-cell 702-367-3538-alt

2. If possible, use spill kit and absorbent material to contain spill.

3. If it is determined that a spill cannot be cleaned up using plant personnel and equipment, call 911. Any manager can make the decision to call 911. Be prepared with the following information:

   i. Name of substance;
   ii. Initial estimate of quantity released;
   iii. Date, time, and duration of the release;
   iv. Type of release (air, water, land);
   v. Names and telephone numbers of contacts;
   vi. Correct site address; and
   vii. Any additional information necessary.

4. Additional information on emergency response is provided in Section 6 of this Spill Prevention Control and Countermeasures Plan (SPCC Plan) and in the Site RCRA Contingency Plan.

EMERGENCY TELEPHONE NUMBERS

FACILITY	
Daniel Church, Operations Manager	(775) 553-2203 ext. 4118
John Dyer, Environmental Manager	(775) 553-2203 ext. 4113
Ingeborg Thomas, Health & Safety Manager	(775) 553-2203 ext. 4132
Robert Marchand, General Manager	(775) 553-2203 ext. 4104
LOCAL EMERGENCY RESPONSE/CLEANUP	
Fire Department	911
NOTIFICATION	
Nevada Division of Environmental Protection Spill Reporting Line	(888) 331-6337 (In State) (775) 687-9485 (Out of State)
RCRA Permitting Branch Supervisor (Regional Director)	(775) 687-9465
US EPA, Region 9 Duty Officer US EPA, Region 9 Facilities Manager	(800) 300-2193 (415) 972-3336
National Response Center	(800) 424-8802

2. FACILITY INFORMATION

2.1 Objective

This is the SPCC Plan for the PCB Processing Facility (Facility) at the US Ecology site (Site), located in Beatty, Nevada. The SPCC Plan sets forth good engineering and management practices for the prevention, control, and containment of releases/spills of PCBs, including the proper disposal of spill and cleanup material. Sound procedures are established to minimize adverse impact on the environment, plant operations, plant personnel, or the public health. Where there are health and safety, emergency response, and hazardous materials/hazardous waste procedures already in effect, they are incorporated into this document by reference.

2.2 Applicability [40 CFR 112.1]

This SPCC Plan has been prepared in accordance with 40 CFR 112 as required by 40 CFR 761.65(c)(7)(ii) and establishes the facility procedure methods and equipment necessary to prevent the discharge of PCBs from the Facility. This SPCC Plan has been prepared because the site meets the following applicability:

- The site is a non-transportation related facility engaged in oil use;
- Due to the location, it can be reasonably expected that the facility can discharge oil in quantities that may reach and be harmful to navigable waters or shoreline;
- Oil is stored in above ground containers equal to or greater than 55 gallons; and
- The total above ground capacity for oil storage in containers is greater than 1,320 gallons.

3. CERTIFICATION OF THE PLAN [40 CFR 112.3]

Except as provided in 40 CFR 112.6 for Qualified Facilities, a licensed Professional Engineer (PE) must review and certify the SPCC Plan for it to be effective and satisfy the requirements of this regulation. According to the regulation, such certification shall in no way relieve the owner or operator of a facility of his duty to prepare and fully implement such SPCC Plan in accordance with the requirements of the regulation.

The following table presents the criteria used to determine if a plant is a Qualified Facility (Tier I or Tier II) or not (40 CFR 112.3(g))

Criteria	Tier I	Tier II	Comments
No above-ground storage containers >5,000 gallons	X		False – two storage tanks that hold 7,500 gallons each and two storage tanks that hold 5,000 gallons each
No single discharge >1,000 gallons in past 3 Years	X	X	True
No two discharges >42 gallons in 12-month period in past 3 years	X	X	True
Aggregate above ground PCB storage capacity of 10,000 gallons or less	X	X	False—Aggregate storage capacity is greater than 10,000 gallons

As shown in the table, this facility does not meet the criteria to be defined as a Qualified Facility. Therefore, certification of the SPCC Plan by a PE is required.

3.1 Corporate Policy Statement

US Ecology management is committed to the complete implementation of this SPCC Plan for the Facility. This includes a commitment to the proper management of all PCB-containing oils, and the expeditious control, cleanup, and proper disposal of any and all spills or leaks. The persons signing below make the following certifications.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate,

and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

By _____ _____
Corporate Environmental Officer Date

_____ _____
General Manager Date
Primary Facility Emergency Coordinator

3.2 Professional Engineer Certification [40 CFR 112.3(d)]

I certify that the information contained within this SPCC Plan was prepared under my direction, in accordance with good engineering practices and, to the best of my knowledge and belief, the information contained is true, complete, and accurate.

I hereby certify that:

- I am familiar with the requirements of 40 CFR 112;
- I have (or my agent has) visited and examined the facility;
- The SPCC Plan has been prepared in accordance with good engineering practice, including the consideration of applicable industry standards, and with the requirements of 40 CFR 112;
- The SPCC Plan establishes procedures for required inspections and testing; and
- The SPCC Plan is adequate for the facility.

Chris A. Bolin
Professional Engineer #49507
Expires 31 October 2015
30 JUNE 2015
Date

4. LOCATION OF THE PLAN [40 CFR 112.3(E)]

The SPCC Plan will be maintained at the following locations:

Copy Number	Location
1	Environmental Compliance Manager's Office
2	Copies maintained in each Manager's Office in the Permits binder

The SPCC Plan will be available for on-site review during normal working hours. A copy of the SPCC Plan also will be maintained in the company's electronic filing system.

5. AMENDMENTS TO THE SPCC PLAN

This Section describes procedures for amending this SPCC Plan. Portions of 40 CFR 761.65(c)(7)(ii) are more stringent and supercede the CWA requirements of 40 CFR 112.4(a), (b) and (c).

5.1 Determination of Needed Amendments by USEPA/State Agencies Following Spills [40 CFR 112.4 (a), (b), (c)]

If a facility discharges more than 1,000 gallons of oil in a single event, or discharges more than 42 gallons in each of two events within any 12-month period, the following information must be submitted to the Regional Administrator and the local state environmental regulatory agency within 60 days from the discharge event(s) at the facility:

- Name of the facility;
- Your name;
- Location of the facility;
- Maximum storage of oil at the facility and the normal daily usage;
- Corrective action and countermeasures taken;
- An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
- The cause of the discharge including failure analysis of the system;
- Additional prevention measures taken or contemplated to minimize the possibility of recurrence; and
- Other information pertinent to the plan or discharge as required by USEPA.

Section IV.F.16 of the TSCA permit requires that the SPCC Plan be reviewed and amended immediately if:

- the SPCC Plan fails in an emergency;
- specified changes occur in the Facility's design, construction, operation, maintenance or other circumstances
- the list of emergency coordinators changes

- the list of emergency equipment changes
- relevant information available to US Ecology indicates a revision is warranted; or
- US EPA determines a revision is needed.

5.2 Amendments as Required by USEPA/State Agencies [40 CFR 112.4(d), (e), (f)]

Any amendments made to the Plan required by the USEPA Regional Administrator must occur within 30 days of such notification, or an appeal can be filed in accordance with 40 CFR 112.4(f).

5.3 Amendments Due to Facility Changes or 5 Year Review [40 CFR 112.5 (a) and (b)]

5.3.1 Facility Changes [40 CFR 112.5 (a)]

The Plan will be amended in accordance with 40 CFR 112.7 and any other applicable sections of 40 CFR 112.5 when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for discharge as described in 40 CFR 112.1(d).

The amendment must be prepared within six months of the change and implemented as soon as possible, but not later than six months following the preparation of the amendment.

Any amendments to the plan require recertification per Section 4.1 and must be listed in **Appendix 1**. Note that, as presented in Section 3.5, a PE must certify any technical amendments.

5.3.2 Five-Year Review [40 CFR 112.5 (b)]

The completion of the review and evaluation will be documented and a statement must be signed when the SPCC Plan is amended. A person at a management level with sufficient authority to commit the necessary resources must document completion of the review. The following words will suffice:

> "I have completed review and evaluation of the SPCC Plan for the PCB Processing Facility, US Ecology Nevada in Beatty, NV on (date) and (will/will not) amend the plan as a result."

A review form and signed review statement will be completed and maintained as part of this SPCC Plan. A copy of the form is available as **Appendix 1**.

5.3.3 Technical Amendments Certified by Professional Engineer [40 CFR 112.5 (c)]

According to 40 CFR 112.5(c), a PE must certify any technical amendment to the SPCC Plan in accordance with 112.3(d). A new certification page should be included, and the revision record should be amended to reflect this change.

Non-technical amendments not requiring the application of good engineering practice do not require PE certification.

5.3.4 Qualified Facilities SPCC Plan Requirements [40 CFR 112.6]

This Facility does not meet the criteria to be classified as a Qualified Facility, as discussed in Section 3 of this SPCC Plan. The Facility may store greater than 10,000 gallons of PCB-containing oil on-site at any time, and the Facility has one or more PCB-containing oil storage tanks that are larger than 5,000 gallons. Therefore, this portion of the rule is not applicable to this Facility.

6. GENERAL REQUIREMENTS FOR SPCC PLAN

6.1 Written Commitment of Manpower, Equipment and Materials [40 CFR 112.7]

6.1.1 Written Commitment

US Ecology management is committed to the complete implementation and execution of this SPCC Plan. This includes a commitment to the proper management of PCBs and the expeditious control, cleanup, and disposal of any PCB spills or leaks.

6.1.2 Responsibilities

The implementation of the SPCC Plan will be the responsibility of the following Facility Personnel.

Title	Personnel	Position	Phone Number
Primary Coordinator	Robert Marchand	General Manager	775-553-2203 x-104
First Alternate	Daniel Church	Operations Manager	775-553-2203 x-118
Environmental Manager	John Dyer	Environmental Compliance Manager	775-553-2203 x-113
Health & Safety Manager	Ingeborg Thomas	Health & Safety Manager	775-553-2203 x-132

6.2 Proposed facilities, methods or equipment not yet fully operational [40 CFR 112.7]

All facilities, methods and equipment related to PCB containing oil handling are fully operational at this time.

6.3 Discussion of Facility Conformance [40 CFR 112.7(a) (1)]

This SPCC Plan is intended to satisfy the requirement of 40 CFR 112 and 40 CFR 761.65(c)(7)(ii).

6.4 Deviations from Requirements [40 CFR 112.7(a) (2)]

There are no deviations from SPCC Plan requirements at this site.

6.5 Physical Layout and Facility Diagram [40 CFR 112.7(a) (3)]

US Ecology Nevada, Inc. operates a PCB Processing Facility located on US Highway 95, eleven (11) miles south of Beatty, Nevada. A Site vicinity map is included in **Appendix 2**. Portions of the site operate under a current TSCA permit issued by the USEPA. The Facility consists of the PCB Storage and Processing Building (PCB Building) and the associated outside PCB Tank

Farm Area and PCB Truck Staging Pad. All operational areas are contained within the site chain-link security fence. All PCBs are handled and stored within this controlled area. The PCB Building, Tank Farm, and Truck Staging Pad areas are shown on the figures in **Appendix 3**.

Facility operations consist of draining transformers and other electrical equipment of PCBs and, if required, flushing the equipment with approved solvents. The PCB-contaminated liquids are stored in steel tanks at the adjacent PCB Tank Farm Area (PCB Tank Area) until they can be shipped to an off-site incineration facility. Prior to the initiation of the draining and flushing operation, the liquid levels of the storage tanks are manually checked for sufficient available volume.

6.5.1 Container Contents and Capacity [40 CFR 112.7(a) (3) (i),(ii),(iii)]

Containerized PCB materials are stored inside the fully enclosed PCB Building. All PCB Articles and Equipment, upon being drained and/or flushed are disposed on-site or sent to an approved off-site disposal or destruction facility. All PCB Articles and Containers placed in storage for disposal are marked with the date the items were first placed into storage. No PCB Article or container is stored for more than one year.

6.5.1.1 PCB Tank Farm Area

Description of Storage Tanks and Containment

The PCB Tank Area consists of 4 tanks, all horizontally mounted on raised concrete cradles or footings. The tanks are located in a 45-foot by 45-foot containment area with a 1.5-foot high containment wall. The containment area floor and walls are constructed of reinforced concrete. The concrete floor and walls are not penetrated by pipes, conduits, or drains. The concrete floor of the PCB Tank Area is sloped to a sump pit with dimensions 48-inch wide by 48-inch long by 18-inch deep. There is no drain or other penetration of the sump pit floor or walls. Liquids that collect in the sump pit are removed by pumping for proper management.

Tank #4: 7,500-gallon PCB-contaminated liquid tank

Tank #5: 7,500-gallon PCB-contaminated liquid tank

Tank #6: 5,000-gallon PCB-contaminated liquid tank

Tank #7: 5,000-gallon PCB-contaminated liquid tank

All of the containment system components (e.g., tanks, pipes, and concrete and joint sealants) in contact with PCB-containing oils are compatible with the waste that is stored within the PCB Tank Area and are not degraded by contact with those materials.

All PCB storage tanks are equipped with liquid level gauges, and audible maximum gallonage alarms. The alarms are tested on a daily basis. All storage tanks are equipped with manual cut-off valves at the tank intakes.

The precipitation event considered in the design of the PCB Tank Area is the 25-year, 24-hour storm. At the facility location, the 25-year, 24-hour storm event is a 2.26-inch rainfall (based on NOAA Atlas 14, Volume 1, Version 5, Amargosa Farms Garey Station ID: 26-0150). This rainfall amount was considered in the design of the PCB Tank Farm containment structure should the design storm occur during a tank failure.

Containment Capacity

Capacities of tanks within the PCB Tank Area: 2 tanks (5,000 gal. each)
2 tanks (7,500 gal. each)

Total volume = 25,000 gallons

Containment capacity required is the larger of:

25% of total liquid storage capacity = 25% of 25,000 gallons = 6,250 gallons

200% of liquid storage capacity of largest tank = 2 x 7,500 gallons = 15,000 gallons

Containment capacity required by 40 CFR 761.65(b)(1)(ii) = 15,000 gallons

USEN conservative determination of PCB Tank Farm containment holding capacity

= 15,000 gallons + design storm precipitation

Design Storm precipitation volume = [2.26 in / 12 in/ft] x 45 ft x 45 ft x 7.48 gal/cu ft = 2,853 gals

Minimum containment capacity required = 17,853 gallons

Containment capacity available = 45 ft wide by 45 ft long by 1.5 ft deep

= 3,038 cu ft x 7.48 gal/cu ft

= 22,721 gallons*

* Actual total capacity is somewhat greater since containment depth at low point (sump pit) is actually 23 inches.

22,721 gallons > 17,853 gallons, liquid holding capacity satisfies 40 CFR 761.65(b)(1)(ii)

Excess capacity is 22,721 – 17,853 gallons = 4,868 gallons

4,868 gallons is equivalent to 3.9 inches of freeboard above the design liquid height

6.5.1.2 PCB Building Storage Area

Description of PCB Building

The process and storage area inside the PCB Building is positioned over a liner system that, from bottom to top, consists of a minimum of 6-inches of clean sand cushion, two 30-mil HDPE liners separated by 6 inches of clean sand, a protective 125-mil polyester filter fabric layer, and a final 1.0-foot thick sand layer.

The floor of the PCB Building contains no drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to escape. The epoxy-coated, non-porous concrete floor contains continuous 9-inch high curbing to prevent PCB-laden liquids from escaping. The PCB Building has a USEPA permitted capacity of 59,400 gallons or 1,080 55-gallon drums (or equivalent).

The PCB Building contains 5 drain and flush stations, each equipped with separate segregated piping (see **Appendix 3**). There is one (1) drain line for draining and one (1) feed line for the addition of flushing liquid. Using a diaphragm pump, the PCB-containing oils are pumped to one of the four temporary storage tanks. Diesel flows directly from a 250 gallon tote to the station. There is no possibility of cross-over contamination between PCB-containing oils and clean flushate.

Each PCB drain and flush station is equipped with high pressure, oil resistant vacuum hose with cam lock quick disconnects for draining. Valves/lines are closed/capped when not in use for extended periods of time. The stingers are made of PVC to allow quick length modifications. The lines that contain PCB oils are located out of the way of traffic patterns to prevent possible damage by vehicles.

Manual cut-off valves are located at the stinger/hose connection, hose/mainline connection, and at all inlets to the 4 storage tanks.

All of the containment system components (e.g., tanks, pipes, concrete sealant, and HDPE liners) are compatible with the waste that is stored within the PCB Building.

PCB Building Containment Capacity

In accordance with SPCC requirements, the containment area must be capable of containing the larger of: **1)** 25% of total liquid holding capacity of PCB Articles and Containers housed or temporarily stored inside the PCB Building, or **2)** 200% of the liquid holding capacity of the largest PCB tank or container housed or stored inside the PCB Building. The following calculation documents the maximum volume of liquids meeting the above criteria.

- 25% of the total capacity: 59,400 gallons x 0.25 = 14,850 gallons
- Twice the volume of largest container: 2 x 330 gallons = 660 gallons

The design criteria is 25% of the total liquid holding capacity of PCB Articles and Containers or **14,850 gallons**

The PCB Building containment capacity must account for drums in place at the time of a potential spill or release. A maximum of 540 drums can be placed on the floor at any one time (50% of the 1,080 permitted drum capacity, since drums will be stacked 2 high). Each drum is assumed to be 24 inches in diameter. The following calculation documents the liquid holding capacity of the PCB Building floor and curbing.

Total containment capacity: 48 ft wide x 100 ft long x 0.75 ft high containment curb

= 3,600 cu. ft. x 7.48 gal/cu. ft.

= 26,928 gallons

Capacity reserved for drums: π x (2 ft/2)^2 x 0.75 ft = 2.36 ft^3 or 17.6 gallons/drum

540 drums x 17.6 gallons/drum = 9,504 gallons

Total volume available for secondary containment: 26,928 gallons – 9,504 gallons = **17,424 gallons**. The volume required is 14,850 gallons; therefore, sufficient containment is provided, including an **excess capacity of 2,574 gallons**.

USEN will operate the PCB Building such that the total liquid holding capacity of PCB Articles and Containers permanently or temporarily housed inside the PCB Building never exceeds a maximum volume of 59,400 gallons.

6.5.1.3 PCB Truck Staging Pad

All loading of PCB-containing oils for off-site disposal or destruction is done on the PCB Truck Staging Pad (PCB Truck Pad). The PCB Truck Pad is a 12-feet wide by 56-feet long reinforced concrete pad. All portions of the Truck Pad slope and drain to a 48-inch by 48-inch by 18-inch deep sump pit. There is no drain or other penetration of the sump pit floor or walls. Liquids collecting in the sump pit as a result of drips or spills occurring during tank truck loading operations are transferred by pump to the appropriate PCB oil holding tank for appropriate management. Liquids collecting in the sump from precipitation are pumped into totes, tested for PCBs and managed appropriately depending on the outcome of sampling.

The PCB Truck Pad is designed for loading tanker trucks up to 10,000 gallons in capacity. The Truck Pad and sump pit provide a liquid holding capacity of about 1,175 gallons. For the purposes of spill prevention, the loading of tanker trucks are under the direction of the PCB Building supervisor or designee. Since truck unloading operations are always conducted and monitored by trained US Ecology operations personnel, the PCB Truck Pad is expected to contain only incidental drips and spills. In the event of larger spillage, tanker loading operations will be terminated immediately by the operator(s) present. Also, loading operations are conducted during daylight hours and not during significant rainfall events. Since the PCB Truck

Pad is intended to contain only minor drips and spills, the 1,175 gallon holding capacity is judged to be sufficient.

The PCB Truck Pad and sump pit are designed to contain the water volume that would be collected during the design storm (25-year, 24-hour storm). The 2.26-inch design storm would generate approximately 947 gallons of water.

All tanker trucks receiving PCB-containing oils at the facility meet applicable DOT requirements.

When tank trucks are positioned for loading they are barricaded to prevent departure before complete disconnect of transfer lines. Facility personnel are present during transfer operations. Transfer lines are capped, and appropriate valves secured after the transfer has been completed.

All incidental spills which may occur during tank truck loading are immediately cleaned-up and placed in appropriate DOT approved containers.

All large spills of oils with PCBs <500 ppm and all spills of PCB oils with PCBs ≥ 500 ppm will be addressed according to Section 3.2 of the Site RCRA Contingency Plan and remediated per the requirements of 40 CFR 761 Subpart G.

6.5.2 Drainage Controls [40 CFR 112.7(a) (3) (iii)]

The land on which the facility is constructed is located in the Amargosa Desert with a very limited chance of drainage to flowing surface-water bodies, navigable or otherwise, except under extreme precipitation conditions greatly exceeding the design storm (i.e., 25-year, 24-hour storm).

PCB-containing oils are processed within a fully enclosed and contained area and all outside PCB storage tanks are located within a contained area. PCB related operations normally are conducted during daylight hours.

PCB Articles and Containers are processed within a controlled containment area inside a metal building. PCB Articles and Containers housed within the PCB Tank Farm Area are within a contained area that prevents contact between PCB-containing oils and area surface water. PCB-

containing oils are kept separate from the facility surface-water drainage system. The run-off of precipitation from the PCB Building roof and facility grounds drains to areas outside of the PCB containment areas. This run-off water does not come in contact with PCB Articles or Containers.

Containers, piping, and containment system components (tanks, liners, sealants, concrete, etc.) are compatible with the PCB-containing oils and are not degraded by contact with those materials.

6.5.3 Discharge Countermeasures [40 CFR 112.7(a) (3) (iv)]

Discharges from tanks or piping should be identified by site personnel conducting daily visual inspections. If a discharge is identified, the countermeasures will include appropriate notifications to the General Manager or his designee, cleanup team identification, and then appropriate cleanup in accordance with Section 6.6.2.2. Containment, diversionary structures, and equipment are provided throughout the Facility to contain PCB-containing oils and/or stormwater on-site. One of the following preventive systems or equivalent is used as a minimum:

- Booms and oil absorbent materials staged inside the PCB Building.

In the event of a spill, the material will be retained in the facility by these respective countermeasures.

6.5.4 Methods of Disposal [40 CFR 112.7(a) (3) (v)]

Waste materials resulting from small incidental spills and leaks of PCBs that are cleaned up with absorbent material will be disposed of in accordance with the Facility TSCA permit, and applicable State and/or local regulations.

6.5.5 Contact List [40 CFR 112.7(a) (3) (vi)]

Needed Emergency Phone Numbers are listed below.

FACILITY	
Daniel Church, Operations Manager	(775) 553-2203 ext. 4118
John Dyer, Environmental Manager	(775) 553-2203 ext. 4113
Ingeborg Thomas, Health & Safety Manager	(775) 553-2203 ext. 4132
Robert Marchand, General Manager	(775) 553-2203 ext. 4104
LOCAL EMERGENCY RESPONSE/CLEANUP	
Fire Department	911
NOTIFICATION	
Nevada Division of Environmental Protection Spill Reporting Line	(888) 331-6337 (In State) (775) 687-9485 (Out of State)
RCRA Permitting Branch Supervisor (Regional Director)	(775) 687-9465
US EPA, Region 9 Duty Officer US EPA, Region 9 Facilities Manager	(800) 300-2193 (415) 972-3336
National Response Center	(800) 424-8802

6.6 Discharge Reporting Information [40 CFR 112.7(a) (4)&(5)]

40 CFR 112.7(a)(4) and 40 CFR 761.125(1) require reporting of a spill or discharge. The Facility is required by its TSCA permit to respond and report on spills following the protocols of its Site RCRA Contingency Plan and in conformance with 40 CFR 761.65.

6.6.1 Definitions

Spill: Both intentional and unintentional spills. Leaks and other uncontrolled discharges where the release results in any quantity of PCBs running off or about to run off the external surfaces of the equipment or other PCB source as well as the contamination resulting from those releases. This definition applies to spills of 50 ppm of PCBs and greater. [40CFR761.123].

Reportable Spill: Oral notification shall be made to the RCRA Facilities Management Office of any incident that requires implementation of the RCRA Contingency Plan and/or the PCB Processing Facility SPCC Plan. A release of 1 pound or more of PCBs into the environment requires oral and written notification to the National Response Center (1-800-424-8802). A release of 10 pounds or less of PCBs into the environment does not require notification of the US EPA, if proper clean-up is conducted in accordance with 40 CFR 761.125(a)(iv). A release of more than 10 pounds of PCBs into the environment requires oral and written notification of the US EPA Regional Office, the NDEP and the National Response Center.

A spill of any amount of PCB material with ≥500 ppm PCBs must be reported.

Contained Spill: Any PCB spill occurring inside a containment area.

Uncontained Spill: Any PCB spill occurring outside a containment area.

6.6.2 Emergency Procedures [40 CFR 112.7(a)(4) & (5)]

6.6.2.1 Emergency Procedures

If a spill or leak occurs, despite the spill prevention measures in place, immediate steps should be taken to eliminate the source and to control, contain, and cleanup the released material. All measures necessary to prevent oil contamination of any water system, and potential discharge from the plant outfall or off-site, must be expeditiously taken. The Site RCRA Contingency Plan will be followed. In general, the following steps will be followed:

1. Evacuate personnel from the immediate area of the spill who are not required for the response.
2. Identify the spilled material(s).
3. Notify a supervisor or manager.
4. Manager will call 911 immediately if spill is uncontrolled and moving off-site. When calling, be prepared with the following information:
    a. Names and telephone numbers of contacts;
    b. Correct facility address
    c. Name of substance;
    d. Initial estimate of quantity released;
    e. Date, time, and duration of the release;
    f. Source of the discharge;
    g. Description of all affected media (i.e., air, water, land);
    h. Cause of the discharge;
    i. Any damages or injuries caused by the discharge;
    j. Actions being used to stop, remove, and mitigate the effects of the discharge;

k. Whether evacuation may be needed;

l. The names of individuals who have been contacted; and

m. Any additional information necessary.

5. Notify the Compliance Department.

6. Take measures to stop the spill. Only do so if it's possible to do safely.

7. Take measures to contain the spill and prevent it from exiting the secondary containment, to the extent it can be done safely.

8. If it is determined that a spill cannot be cleaned up using plant personnel and equipment, call 911. Any manager can make the decision to call 911. Be prepared with the information listed in #4 above.

9. If it is determined the spill can be cleaned up using plant personnel and equipment.

   a. Put on the appropriate PPE based on the MSDS.

   b. Always use dry methods to clean up petroleum spills. Never hose down spills or leaks.

   c. Spread absorbents on the oil and/or pump the oil into appropriate containers.

   d. Dispose of cleanup wastes properly.

   e. Complete the Oil Spill Cleanup Record and forward a copy to the Environmental Compliance Department.

10. Notify required government agencies.

6.6.2.2 General Response and Clean-Up Requirements

General Response to Spills

Spills of PCB-containing oils will be evaluated to determine proper method of clean-up and what reporting, if any, is required. All spills of oil containing ≥ 500 ppm PCB must be cleaned up in accordance with 40 CFR 761, Subpart G, regardless of the size of the spill. All other small incidental spills of PCB-containing oils of < 500 ppm PCBs that occur during draining and flushing operations will be cleaned up by the end of each operating day. All small incidental spills will be cleaned up with "Floor-Dri" material and placed in a drum for subsequent disposal. Collection of incidental spill material will be performed with shovels, brooms, and spill pillows

or other absorbent material. Spill kits are maintained within the PCB Building and available for use by PCB building operations personnel.

In the event that a larger spill occurs within the PCB Building, all feed lines to the storage tanks will be closed, if required, and all processing operations will cease. Immediate clean-up measures will be conducted under the supervision of the General Manager (GM) or his designee. The GM or his designee will ensure that all personnel involved in any spill clean-up procedures are properly outfitted with the necessary personal protective equipment.

The spilled oils will be bermed and confined to as small an area as possible prior to clean-up. As much of the oil as practical will be removed in liquid form and placed in the appropriate PCB storage tanks. Solidification will be performed on only the liquid volume that cannot be practically transferred into the tanks.

If the spill or leak involves a PCB bulk storage tank, or associated piping, the feedline cut-off will be isolated, and the tank or line will be immediately patched and emptied until permanent corrective action can be completed. If the volume of standing oil is too great for drumming, a contractor will be summoned to remove the oil for approved off-site processing.

The GM or his designee will continually monitor the incident by observation for signs of further release.

When the spill has been stabilized, the GM or his designee will immediately notify all other site management who will ensure that the appropriate state and federal authorities are contacted.

When remedial clean-up operations are completed, all contaminated materials and equipment that are not suitable for decontamination will be placed in DOT-approved containers for disposal.

Equipment that is suitable for decontamination will be decontaminated in accordance with standard facility procedures before being released for reuse.Specific Clean-Up Requirements

a. Low Concentration Spills, Less Than 1 lb of PCBs
   - Low concentration spills involve <1 lb. of PCBs by weight (<270 gallons of untested mineral oil, containing <500 ppm PCBs). Solid surfaces must be double washed/rinsed. Post cleanup confirmation wipe samples, to show adequate cleanup, must have a concentration of <10µg/100 cm^2.

- Must be completed within 48 hours after the responsible party is notified or becomes aware of the spill- action can be delayed in case of adverse conditions
- At completion of cleanup, the responsible party must document the cleanup with records and certification of decontamination.

b. High-Concentration Spills, and Low Concentration Spills of 1 lb or More PCBs

- Actions must be taken as quickly as possible, and within no more than 24 hours (or within 48 hours for PCB transformers) after the responsible party is notified or becomes aware of the spill
- Action can be delayed in case of adverse conditions.
- Effectively cordon off or otherwise delineate and restrict an area encompassing any visible traces plus a 3-foot buffer and place clearly visible signs advising persons to avoid the area to minimize the spread of contamination as well as the potential for human exposure.
- Record and document the area of visible contamination
- Note the extent of visible traces and the center of the visible trace area.
- If no visible traces are present, note it.
  - Contact the EPA regional office for guidance in completing statistical sampling of the spill area to establish spill boundaries.
- Initiate cleanup of all visible traces of the fluid on hard surfaces.
- Initiate removal of all visible traces of the spill on soil and other media (gravel, sand, etc.)
- If there is a delay in reaching the site and there are insufficient visible traces of PCBs remaining at the spill site, estimate area of the spill and immediately cordon off the area of suspected contamination.
  - Estimate is based on the amount of material missing from the equipment or container.
  - As soon as practicable, a statistically based sampling scheme will be used to identify the boundaries of the spill area

c. Decontamination Requirements

- Cleanup will be verified by post-cleanup sampling
  - Non-impervious solid surfaces: $\leq 10 \mu g/100\ cm^2$
  - Contaminated soil: ≤ 1 mg/kg PCBs by weight

d. Post-Cleanup Sampling Requirements

- Sampling area must be the greater of:
  - Area cleaned plus an additional 1-foot boundary, or
  - An area 20% larger than the original area of contamination
- The sampling scheme must ensure 95% confidence against false positives
- The number of samples must be sufficient to ensure areas of contamination will be detected
  - Minimum number of samples is 3
  - Maximum number of samples is 40
- Sampling scheme must include calculation for expected variability due to analytical error
- EPA recommends the use of a sampling scheme developed by the Midwest Research Institute

- EPA may, at its discretion, take samples from any spill site
  - If EPA's sampling indicates levels exceed the required level, further cleanup will be required

6.7 Reporting [40CFR761.65(d)(44)(iv); 40CFR761.75(c)(3)(ii)]

The Site RCRA Contingency Plan, applicable by reference under the Site TSCA permit, requires the following reporting to the NDEP when an incident occurs that requires implementation of the Site RCRA Contingency Plan. Implementation of the Contingency Plan occurs when the Emergency Coordinator identifies fire, explosion or a release of hazardous waste or constituents which could threaten human health or the environment.

Oral notification will be made as soon as possible after becoming aware of the release, but no later than 24 hours following the incident. The oral report will be followed by a written report within 15 days. The information will include (Contingency Plan Section 7.7.0):

- Name, address and telephone number of the owner/operator of the Facility;
- Name, address and telephone number of the Facility;
- Date, time and type of the incident;
- Name and quantity of material(s) involved;
- The extent of injuries, if any;
- Response action taken;
- An assessment of actual or potential hazards to human health or the environment, where applicable;
- Estimated quantity and disposition of recovered material that resulted from the incident.

In accordance with the Site TSCA permit, oral and written notification shall be made to the Region IX Manager of the RCRA Facilities Management Office of any incident that requires implementation of the Site RCRA Contingency Plan and/or the PCB Processing Facility SPCC Plan, as follows:

For a release of 1 pound or more of PCBs (material with 50 ppm to <500 ppm) into the environment:

- Oral notification to the NDEP Spill Reporting Hotline, National Response Center, EPA Region IX, and NDEP-BWM RCRA Facilities Branch Supervisor within 24 hours after discovery or by noon of the next business day, whichever is later, after the incident.

- A full investigation into the cause of the incident; a detailed report shall be entered into the daily operating records.
- A written incident report shall be submitted to the NDEP and USEPA within 15 days after the incident.

For a release of any quantity of material containing ≥ 500 ppm of PCBs:

- Oral notification of the NDEP, National Response Center, NDEP-BWM RCRA Facilities Branch Supervisor, and EPA Region IX within 24 hours after discovery or by noon of the next business day, whichever is later, after the incident.
- A full investigation into the cause of the incident; a detailed report shall be entered into the daily operating records.
- A written incident report shall be submitted to the USEPA within 15 days after the incident.

The report must contain at least the following information:

(a) Date, time and type of incident

(b) Name and quantity of material(s) involved;

(c) The extent of injuries, if any;

(d) Response actions taken;

(e) An assessment of actual or potential hazards to human health or the environment, where applicable; and

(f) Estimated quantity and disposition of recovered materials that resulted from the incident.

7. SPILL SCENARIOS FROM EQUIPMENT FAILURES [40 CFR 112.7 (B)]

7.1 Historical Spills [40 CFR 112.7 (b)]

Releases have occurred in the past, from loading and off-loading PCB containing liquids from transport trucks, and non-bulk container management practices. Spills of PCB containing materials are controlled and captured by the containment structures, which include the PCB building, the containment for the four stationary tanks and the truck off-loading ramp.

7.2 Potential Spills [40 CFR 112.7 (b)]

The following table lists potential sources and describes their potential spill directions. Spill direction is determined as if containment was not present.

Source	Type of Failure	Volume (gal)	Rate	Direction of Flow	Containment
Tank No. 4	Tank failure	7,500	Slow leak or instantaneous spill	eastward	Within secondary containment
Tank No. 5	Tank failure	7,500	Slow leak or instantaneous spill	eastward	Within secondary containment
Tank No. 6	Tank failure	5,000	Slow leak or instantaneous spill	eastward	Within secondary containment
Tank No. 7	Tank failure	5,000	Slow leak or instantaneous spill	eastward	Within secondary containment
Non-bulk portable containers	Container failure	5 to 250	Slow leak or instantaneous spill	eastward	Within secondary containment
Transport trucks	Hose failure	200	40 gpm	eastward	Within secondary containment

7.2.1 Surface-Water Drainage

Surface-water runoff from the Facility flows to the east and ponds along the access road. Storm water that falls onto and in the PCB Tank Farm and Truck Staging Pad stays within the containment until pumped out and properly disposed.

Surface water run-on is controlled by a diversion ditch on the Site's north side.

8. FACILITY CONTAINMENT FOR SPILL SCENARIOS [40 CFR 112.7 (C)]

8.1 Spill Prevention Systems – Onshore [40 CFR 112.7(c) (1)]

General

Spill prevention is accomplished by secondary containment design, operation and inspections procedures, and stormwater run-on controls. Containment design for the PCB Building, PCB Tank Farm Area and PCB Truck Pad includes concrete materials, sealed surfaces and bermed edges. There are several spill kits located at the Facility for initial response.

Source	Type of Failure	Volume (gal)	Secondary Containment	Containment Secondary Containment Capacity (gallons)
Tank No. 4	Tank failure	7,500	Concrete, bermed, sealed common enclosure	22,721
Tank No. 5	Tank failure	7,500	Concrete, bermed, sealed common enclosure	22,721
Tank No. 6	Tank failure	5,000	Concrete, bermed, sealed common enclosure	22,721
Tank No. 7	Tank failure	5,000	Concrete, bermed, sealed common enclosure	22,721
Non-bulk portable containers	Tank failure	5 to 330	PCB building, concrete, bermed, sealed	17,424
Transport trucks	Hose failure	200	Concrete, bermed, sealed, with sump	1,175

8.2 Spill Prevention Systems – Offshore [40 CFR 112.7(c) (2)]

Not Applicable - No offshore facilities are present at this Site.

9. IMPRACTICABILITY OF SPECIFIC REQUIREMENTS [40 CFR 112.7 (D)]

9.1 Oil Spill Contingency Plan [40 CFR 112.7(d) (1)]

This requirement is not applicable because the required containment, equipment, and procedures are in place.

9.2 Written Commitment of Manpower, Equipment and Materials for Spill Control [40 CFR 112.7(d) (2)]

This requirement is not applicable because the required containment, equipment, and procedures are in place.

10. INSPECTIONS, TESTS AND RECORDS [40CFR 112.7 (E)]

10.1 Inspections

Personnel perform regular inspections of the permanent above-ground storage tanks on a daily and weekly basis and routinely observe the containers and containment storage, use and handling areas during normal business hours and activities. Inspections of containers and containment storage are documented on the inspection forms and checklists included in **Appendix 4**. If spills or leaks are observed, small ones are cleaned up by Facility personnel. Larger ones are also reported to the Operations manager and Environmental Compliance Manager.

Bulk Storage Container Inspection Schedule

CONTAINERS	INSPECTION PROCEDURES
Storage Containers	Routinely observed during normal daily activities for signs of deterioration, discharges or accumulation of oil on the floor. Observations are included as part of the daily inspection, and documented on the inspection form.
Tanks	Each tank is inspected daily. The inspections include: 1) visually checking the tank and piping condition, 2) ensuring that there is no fluid in the secondary containment.

10.2 Recordkeeping

Records required by this SPCC Plan will be maintained on file for a period of three years. The records will be of sufficient quality and quantity to support and document adherence to this SPCC Plan.

The following is a list of records that will be kept on file at the Site.

- Container and containment area inspection forms.
- Descriptions of spills or leaks that occur after the effective date of this SPCC Plan. The records will include the date, volume of the release, and summary of response actions implemented.
- Employee training records documenting training required under this SPCC Plan.

11. PERSONNEL, TRAINING, AND DISCHARGE PREVENTION PROCEDURES [40 CFR 112.7 (F)]

11.1 Personnel Training [40 CFR 112.7(f) (1)]

The GM or his designee is responsible for oil spill prevention, including employee training, and reporting to line management. The GM will provide written reports to company and government officials, as required, under this SPCC Plan, and is responsible for review and amendment of this document. Implementation of this SPCC Plan and compliance in their area of operations is the responsibility of the PCB processing facility supervisor.

All Facility personnel are trained to prevent accidental releases from oil storage facilities and to recognize and report visible releases from such facilities. Persons involved in use of the PCB processing facility will be instructed in the operation and maintenance of equipment to prevent discharges of PCBs; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the contents of the facility SPCC Plan. Persons who would be involved in spill control and countermeasures will attend regular Spill Prevention training. Such training will be given within 30-days of personnel assignment to duties relating to use of the PCB processing facility, and will be repeated for all involved personnel at least once each year.

Records on personnel training, subjects discussed, and a list of attendees will be recorded and maintained by the Environmental Compliance Manager for a period of three years.

11.2 Designated Person Accountable for Discharge Prevention [40 CFR 112.7(f) (2)]

The designated person accountable for discharge prevention is the General Manager or his designee.

11.3 Discharge Prevention Briefings [40 CFR 112.7(f) (3)]

At a minimum discharge prevention training will be conducted with employees who handle PCB wastes on an annual basis to assure adequate understanding of the SPCC Plan for the Facility.

Training records will be maintained for a period of three years and will include a short description of the topics covered, and employee sign-in sheets. The training records will be kept on file in the Environmental Department.

12. SECURITY [40 CFR 112.7 (G)]

12.1 Facility Fencing

The active portion of the Site property is enclosed by fencing and is monitored. The entrance gate is monitored during the day by site personnel and by security personnel at night and on non-working days. Unmanned gates are locked. All visitors must report to the Facility office before entering and exiting the active portions of the Site.

12.2 Securing of Container Drain Valves

The master flow and drain valves and any other valves that allow direct outward flow of the contents of a tank to the surface have been provided adequate security measures so that they remain in the closed position when in non-operating or non-standby status.

12.3 Locking of Oil Pump Starter Controls

The facility has no oil pump starter controls. Therefore, this requirement is not applicable.

12.4 Securing of Loading/Unloading Connections

Connections are securely capped when they are not in use and blank-flanged when they are in standby service for an extended time.

There are no out-of-service pipelines at the Facility, therefore the out-of-service pipeline regulations do not apply. Connections have cam-locks with locking pins to prevent unwanted discharges/releases during loading/unloading.

12.5 Facility Lighting

Facility lighting is sufficient to allow Facility personnel to discover spills during hours of darkness and detect acts of vandalism.

13. FACILITY LOADING/UNLOADING RACKS [40 CFR 112.7 (H)]

This section is not applicable because there are no loading/unloading racks at this Facility.

14. BRITTLE FRACTURE EVALUATION OF FIELD-CONSTRUCTED CONTAINERS [40 CFR 112.7 (I)]

No tanks covered by this SPCC Plan are field-constructed above-ground containers; thus, this requirement is not applicable.

15. CONFORMANCE WITH STATE REQUIREMENTS [40 CFR 112.7 (J)]

Where the Facility's TSCA permit has more stringent amendment procedures, reporting protocols and spill response procedures than 40 CFR 112, they were included, specifically, Sections 5.1, 5.2, 6.6, and 6.7.

16. QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT [40 CFR 112.7 (K)]

The general secondary containment requirements required by 40 CFR 112.7 (c) are met at this Facility; thus, this requirement is not applicable.

17. SPCC PLAN REQUIREMENTS FOR ONSHORE FACILITIES [40 CFR 112.8]

17.1 Diked Storage Area Drainage [40 CFR 112.8(b) (1)]

Diked storage areas (including the PCB Tank Farm Area, the PCB Building Storage Area, and the PCB Truck Staging Pad) are drained using manually controlled pumps to ensure no oil will be discharged.

17.2 Valve Design for Diked Area Drainage [40 CFR 112.8(b) (2)]

This Facility has no valves for the drainage of diked storage areas.

17.3 Drainage from Undiked Areas [40 CFR 112.8(b) (3)]

This Facility has no undiked storage areas; therefore, this requirement is not applicable.

17.4 Diversion Systems [40 CFR 112.8(b) (4)]

Alternate diversion systems are not necessary at this Facility.

17.5 Safeguards for Human Error and Equipment Failure [40 CFR 112.8(b) (5)]

There is no drainage water treatment unit at this Facility; therefore, this section is not applicable.

18. BULK STORAGE CONTAINERS [40 CFR 112.8 (C)]

18.1 Container Materials and Construction Compatibility [40 CFR 112.8(c) (1)]

All bulk storage containers (Tanks 4 through 7), associated piping and DOT approved steel drums, are compatible with the contents stored in them and the conditions of storage (such as pressure and temperature). The tanks used to store PCB liquids are listed below.

Container No.	Location	Volume (gal)	Contents	Construction Materials
Tank 4	PCB Tank Farm Area	7,500	PCB-containing oil	Steel tank
Tank 5	PCB Tank Farm Area	7,500	PCB-containing oil	Steel tank
Tank 6	PCB Tank Farm Area	5,000	PCB-containing oil	Steel tank
Tank 7	PCB Tank Farm Area	5,000	PCB-containing oil	Steel tank

18.2 Containment [40 CFR 112.8(c) (2)]

The following is a summary of the containment provided for bulk storage containers.

AREA	CONTAINMENT VOLUME
Tank No. 4, 5, 6, 7	22,721 gallons
PCB Building	17,424 gallons

As discussed in Section 6.5.1, the PCB Tank Farm Area is sealed concrete floor and walls, and has sufficient capacity for 200% of the contents of the largest tank (7,500 gallons) plus the precipitation of a 25-year 24-hour storm event.

As discussed in Section 6.5.1, the PCB Building Storage Area is sealed a sealed liner system with no openings that would permit liquids to escape. The PCB Building Storage Area has sufficient capacity for greater than 25% of the total liquid holding capacity of PCB Articles and Containers.

18.3 Drainage Procedures from Diked Areas [40 CFR 112.8(c) (3)]

Rainwater from diked storage areas (including the PCB Tank Farm Area and the PCB Truck Staging Pad) is drained using manually controlled pumps to ensure no oil will be discharged. No bypass valves are present. The retained rainwater is inspected prior to draining. Adequate records of draining the rainwater is kept in accordance with 40 CFR 112.8(c)(3)(iv).

18.4 Corrosion Protection of USTs [40 CFR 112.8(c) (4)]

There are no USTs at this Facility.

18.5 Corrosion Protection of Partially-buried Tanks [40 CFR 112.8(c) (5)]

There are no partially buried tanks at this Facility.

18.6 Integrity Testing of Above-ground Containers [40 CFR 112.8(c) (6)]

Tank integrity testing is to performed on an annual basis in accordance with ASTM E797: Standard Practice for Measuring Thickness by Manual Ultrasonic Pulse-Echo Contact Method. Testing is to be done by a certified inspector.

18.7 Tank Internal Heating Coils [40 CFR 112.8(c) (7)]

There are no tank internal heating coils at this Facility.

18.8 Fail-Safe Overfill and Liquid Level Devices [40 CFR 112.8(c) (8)]

All tanks are manually filled and require personnel to be actively present for both filling and overfill protection observation. Tanks are equipped with audible high level alarms.

18.9 Effluent Treatment System Inspections [40 CFR 112.8(c) (9)]

Effluent treatment systems are not present at this Facility.

18.10 Correction of Visible Discharges and Removal of Oil Accumulation from Diked Areas [40 CFR 112.8(c) (10)]

Visible discharges that result in loss of oil from a container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts, are promptly corrected. Any accumulations of oil in a diked area is promptly removed.

18.11 Mobile/Portable Containers Siting and Containment [40 CFR 112.8(c) (11)]

Mobile or portable containers of oil/solvent will be stored within the PCB Building containment area.

19. FACILITY TRANSFER OPERATIONS, PUMPING AND FACILITY PROCESS [40 CFR 112.8 (D) (1)]

19.1 Corrosion Provisions for Buried Piping [40 CFR 112.8(d) (1)]

There is no buried piping at this Facility.

19.2 Security of Transfer Connections [40 CFR 112.8(d) (2)]

Pipe connections are equipped with a cap or blank flange when not in use or in standby service for an extended period of time. Cam locks with locking pin are used to prevent premature disconnection during processing, loading and unloading.

19.3 Pipe Support Design [40 CFR 112.8(d) (3)]

There are no pipe supports at this Facility; therefore, this section does not apply.

19.4 Inspections of Above-ground Valves, Piping and Appurtenances [40 CFR 112.8(d) (4)]

The aboveground valves, piping and appurtenances are inspected each working day. Written documentation is included on inspection forms. Aboveground piping, valves, etc. are inspected for leaks on a quarterly basis during the Method 21 inspection.

19.5 Warning Practices for Vehicles [40 CFR 112.8(d) (5)]

Vehicles arriving for loading/unloading are directed to the proper location by PCB Building personnel.

APPENDIX 1

SPCC PLAN REVIEW FORM

SPCC PLAN REVIEW FORM

I have completed the review and evaluation of the SPCC Plan for the PCB Processing Facility at the US Ecology Site in Beatty, Nevada, on the date listed below, and the SPCC Plan will (or will not) require amendment (40 CFR 112.5).

Reason for review: _____

Name: _____

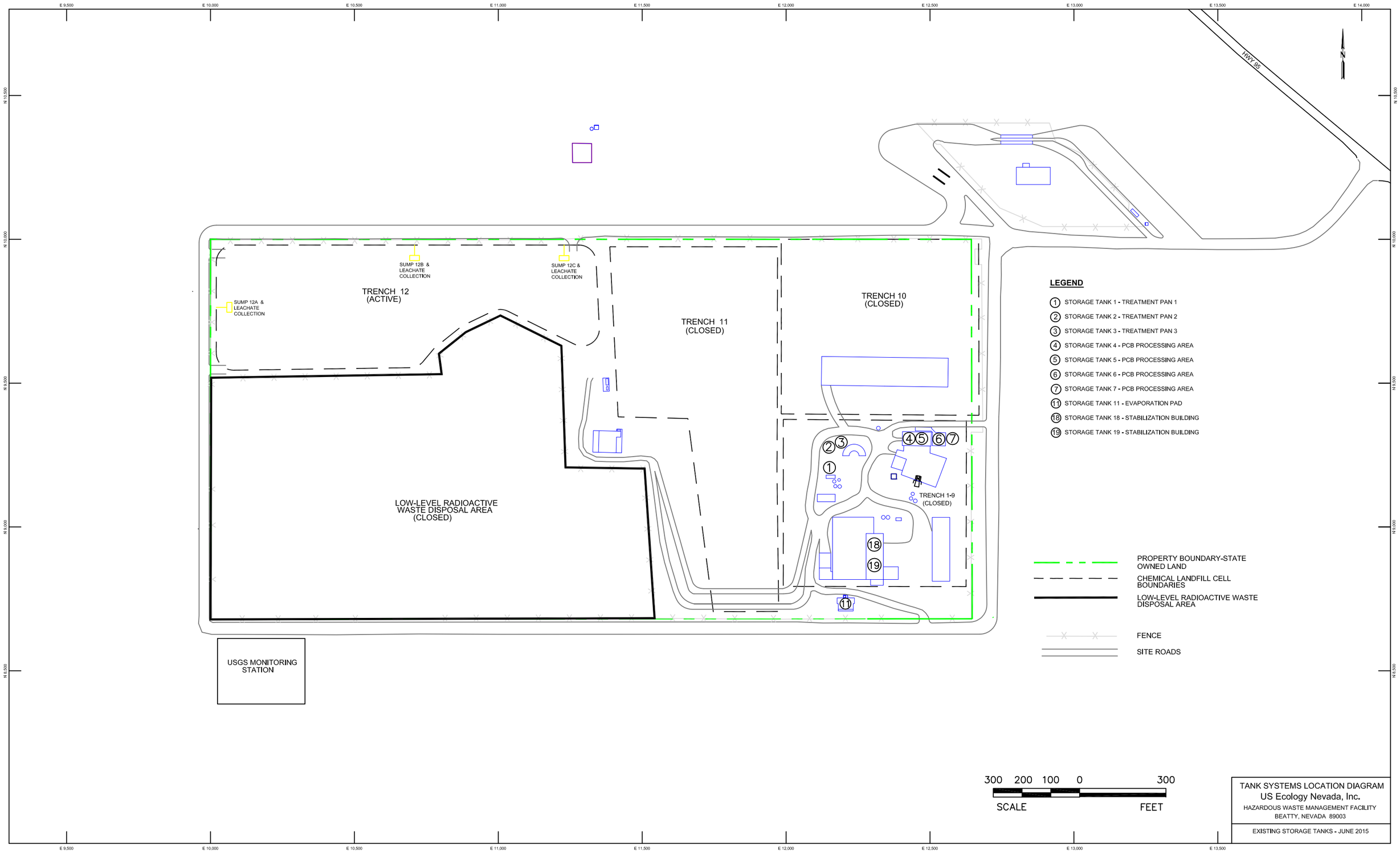
Title: _____

Signature: _____

Date: _____

APPENDIX 2

FACILITY DIAGRAM

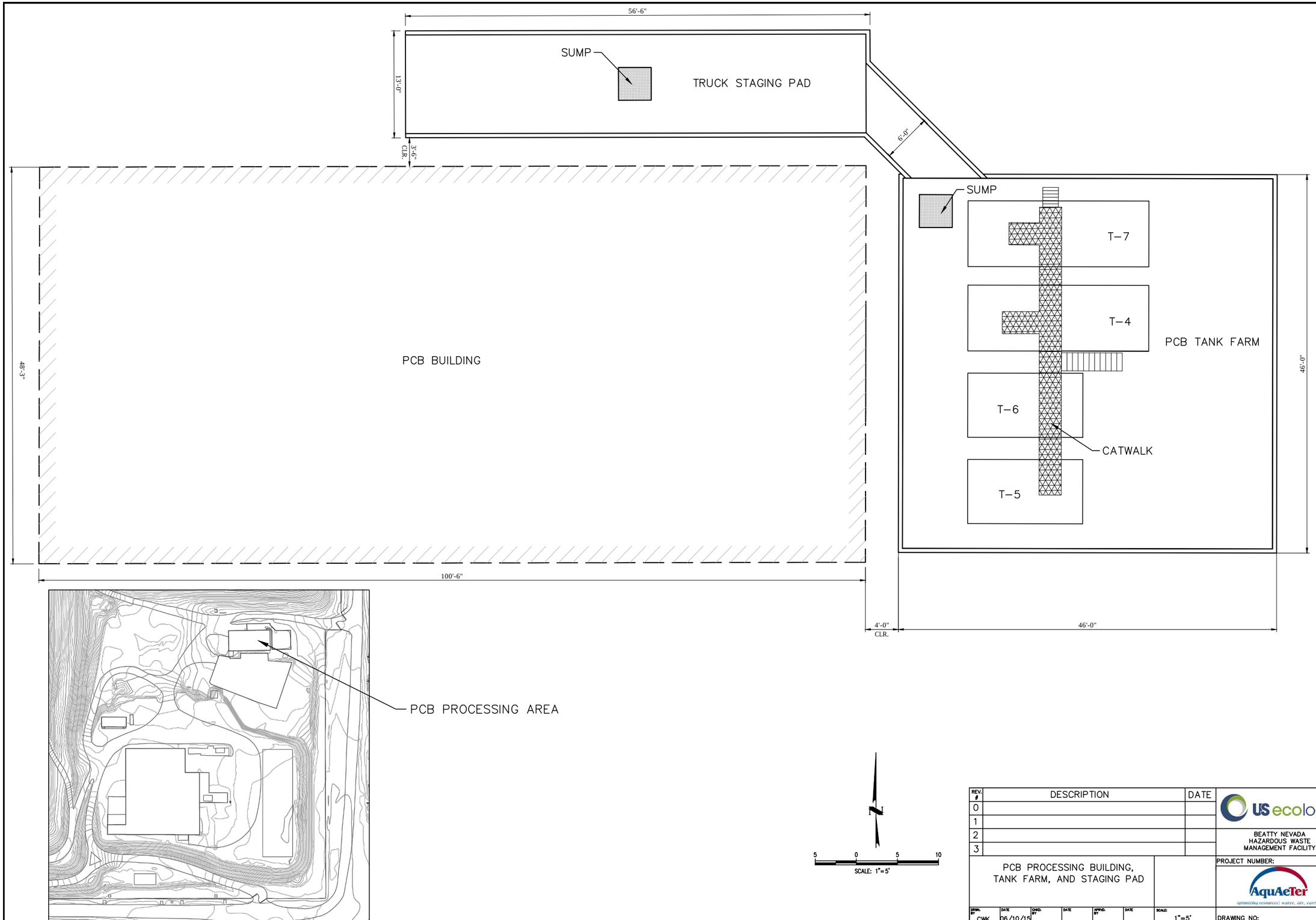


TANK SYSTEMS LOCATION DIAGRAM
US Ecology Nevada, Inc.
HAZARDOUS WASTE MANAGEMENT FACILITY
BEATTY, NEVADA 89003

EXISTING STORAGE TANKS - JUNE 2015

APPENDIX 3

PCB PROCESSING BUILDING AND TANK FARM AREA DRAWING



REV. #	DESCRIPTION	DATE
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US ecology

BEATTY NEVADA
HAZARDOUS WASTE
MANAGEMENT FACILITY

PCB PROCESSING BUILDING,
TANK FARM, AND STAGING PAD

PROJECT NUMBER:

AquAeTer
optimizing resources | water, air, earth

DRWN. BY	DATE	CHKD. BY	DATE	APRVD. BY	DATE	SCALE:
CWK	06/10/15					1"=5'

DRAWING NO:

APPENDIX 4

DAILY AND WEEKLY INSPECTION CHECKLIST FORMS

BEATTY

CMU #1, Tanks T-4, T-5, T-6 and T-7 Daily Inspection

PCB Building

DATE (m/d/y): _____ TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

INSPECTED ITEMS	SATISFACTORY	
PCB PROCESSING AND STORAGE	YES	NO
PCB PROCESSING AND STORAGE: Audible Alarms (ensure working order)		
Storage Tanks (corrosion, erosion or leaks)		
Valves, lines, and fittings (corrosion, erosion or leaks)		
PCB Tank Farm Secondary Containment Sumps for presence of liquids		
PCB processing: Storage Area (signs of spills, leaks, deteriorated/damaged containers)		
PCB Items, articles, and containers in storage are properly labeled and identified.		
PCB containers in storage are within nine months of their accumulation start date		
Inspect collection sumps in tank farm and truck loading areas for presence of liquids		
RCRA STORAGE : RCRA container storage (signs of leaks, spills, damaged/deteriorated containers, open containers in storage)		
RCRA waste in storage is compatible with stored PCB waste		
RCRA containers in storage are properly labeled, marked, and identified (Note any "Waste Pending" labels below, including Profile #)		
RCRA containers in storage are within seven months of their accumulation start date		
GENERAL : General Housekeeping (trash, debris, etc.)		
Concrete flooring and containment for expansion cracks, corrosion and other signs of deterioration		
Safety equipment present in proper working condition and properly stored. Chains on walkways on PCB storage tanks in 'closed' position.		
RCRA/PCB containers palletized and stored with a minimum three foot aisle space		
If >500 VOC – are containers managed per Subpart CC requirements: Meet Level 1 Standards (**)		
AFTER STORMS INSPECTIONS (complete only after storm event of 0.25" or greater (Facility Inspection Plan Section 5.1.2)		
Inspect tank containment for standing liquid or erosion		
FLOOR CONDITION (40 CFR Part 761)		
The epoxy coating is in tact and in good condition		
The colored undercoat is not exposed		
There is no evidence of spills and/or contamination		
The floor/building is maintained in a clean and orderly manner		

*Any items which have determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency Corrective Action Report".
*Remarks/Corrective Action:

_____

_____

*If corrective action is taken: include action taken, date completed and name of individual taking the action.

** 40 CFR Part 264.1086 (c)
- (1) i DOT approved container.
  - ii Adequate cover with no holes, gaps, or open spaces
  - iii Hazardous waste is not exposed to the atmosphere
- (2) Adequate closure device
- (3) Maintained in closed position

Revised 3/19/2015 RH

BEATTY
WEEKLY FACILITY INSPECTION REPORT

DATE: _____ TIME: _____

EMPLOYEE PERFORMING INSPECTION: _____

A Weekly Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection. Please check satisfactory or unsatisfactory for each item inspected.

EMERGENCY RESPONSE EQUIPMENT	*Sat.*	*Unsat.*	**SECURITY FENCE AND WARNING SIGNS**	*Sat.*	*Unsat.*
Ensure emergency response radios are operational and readily available.			Inspect fence and barriers surrounding the facility for damage/vandalism.		
Test Emergency Alert System.			Inspect the outside perimeter for indication of unauthorized entry.		
MAIN LAB WASTE ACCUMULATION CONTAINERS	*Sat.*	*Unsat.*	**SATELLITE LAB WASTE ACCUMULATION CONTAINERS**	*Sat.*	*Unsat.*
Inspect all piping for evidence of damage or leakage.			Inspect all piping for evidence of damage or leakage.		
Inspect accumulation container for signs of leakage / check accumulation start date.			Inspect accumulation container for signs of leakage / check accumulation start date.		
Inspect containment structure for presence of spills, standing liquid and signs of cracks or other damage.			Inspect containment structure for presence of spills, standing liquid and signs of cracks or other damage.		
Inspect satellite accumulation containers for spills, standing liquid, signs of cracks or other damage, proper labeling and proper storage of drums.			Inspect satellite accumulation containers for spills, standing liquid, signs of cracks or other damage, proper labeling and proper storage of drums.		
Perform a lab eyewash test.			Perform a lab eyewash test.		
LANDFILL- CELL 11	*Sat.*	*Unsat.*	**LANDFILL- CELL 12**	*Sat.*	*Unsat.*
Inspect leak detection/collection system for presence of leachate. (Monthly)			Inspect run-on control ditches for signs of erosion or sand, silt, or other deposits which might impede storm water flow.		
Inspect for signs of erosion, cracks, and integrity.			Inspect run-off control mechanisms to ensure proper performance, ie: Inspect above-grade dikes for signs of instability erosion, or other problems and ensure waste placement elevations are maintained at a minimum of one foot below crest elevation.		
SAFETY SHED/TRENCH 12			Inspect leak detection/collection system for presence of Leachate.		
Ensure that safety and fire control equipment is readily available			Inspect wind dispersal control systems for proper functioning.		
DHWSA 2	Sat	Unsat	**DHWSA 3**	*Sat.*	*Unsat.*
Inspect for signs of damage, leakage or fugitive odors from roll-offs.			Inspect for signs of damage, leakage or fugitive odors from roll-offs.		
Inspect all containers for proper labels and identification.			Inspect all containers for proper labels and identification.		
Inspect for signs of spillage on pad.			Inspect for signs of spillage on pad.		

RMH 7/15/14

PCB BUILDING	Sat.	Unsat.	PCB TANK FARM/TRUCK PAD	Sat.	Unsat.
Inspect containers for leakage, severe rusting or structural defects.			Inspect containment for cracks, erosion, and other signs of deterioration.		
Ensure proper container labeling and identification.			Ensure epoxy coating is intact and in good condition.		
Inspect flooring for cracks, erosion, and other signs of deterioration.			Inspect storage tanks for corrosion, erosion or leaks.		
Ensure epoxy coating is intact and in good condition.			Inspect for liquids in secondary containment and sumps.		
TRUCK PARKING PAD	Sat.	Unsat.	**CONTAINER MANAGEMENT BUILDING**	Sat.	Unsat.
Inspect for signs of damaged or leaking drums.			Inspect for liquids in secondary containment.		
Inspect all containers for proper labeling.			Inspect containment structure for cracks, damage or structural defects that could cause failure.		
Remove any accumulated liquid.			Ensure stored containers are closed.		
Inspect for sign of spillage on pad.			Ensure proper container labeling and adequate aisle space.		
MAINTENANCE AREA	Sat	Unsat.	Inspect containers for leakage, severe rusting or structural defects.		
Inspect Empty roll-off bins (waiting for repairs) for residual waste.					
CLOSED CELLS	*Sat.*	*Unsat.*	**PORTABLE WATER TANK**	Sat.	Unsat.
Inspect for signs of erosion, cracks, and integrity.			Ensure the water truck if full and available for fire control.		

Any item which had been determined as “Unsatisfactory” shall be noted in remarks with an explanation and “Corrective Action” to be taken.

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