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# EMERGENCY RESPONSE PLAN

## WEST LAKE LANDFILL SUPERFUND SITE OPERABLE UNIT-1

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The United States Environmental Protection Agency Region VII



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## LIST OF ACRONYMS

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ACRONYM	Definition	ACRONYM	Definition
ASAO	Administrative Settlement Agreement and Order of Consent	OU	Operable Unit
BMP	Best Management Practices	PPE	personal protective equipment
EPA	Environmental Protection Agency	RA	Remedial Action
ERP	Emergency Response Plan	RD	Remedial Design
FS	Feasibility Study	RI	Remedial Investigation
GERT	General Employee Radiation Training	RIM	Radiologically Impacted Material
HASP	Health and Safety Plan	ROD	Record of Decision
HAZWOPER	Hazardous Waste Operations and Emergency Response	RSP	Radiation Safety Plan
IMP	Incident Management Plan	SPCC	Spill Prevention, Control, and Countermeasures
MDNR	Missouri Department of Natural Resources	SOW	Statement of Work
NCC	Non-Combustible Cover	SWMP	Site Wide Monitoring Plan
OEM	Office of Emergency Management	UAO	Unilateral Administration Order
O&M	Operation & Maintenance Plan	USC	United States Code

## 1.0 INTRODUCTION

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This Emergency Response Plan (ERP) has been prepared for Operable Unit-1 (OU-1) of the West Lake Landfill Superfund Site (the “site”). The plan describes the procedures that will be used in the event of an accident or emergency at OU-1 during the implementation of the Remedial Design (RD) / Remedial Action (RA).

This plan has been prepared in accordance with the requirements of the Remedial Design Statement of Work (SOW), Operable Unit-1, West Lake Landfill Superfund Site (EPA 2019b). Specifically, the plan is intended to fulfill the requirements of SOW Paragraph 5.7(b) [“Emergency Management Plan”]. This ERP is Deliverable 3 on the RD Schedule presented in SOW Paragraph 6.2.

This ERP may be revised as necessary – if approved by EPA – during the RD/RA process to reflect changes in site conditions, RD/RA activities, or the party(ies) conducting RA.

The ERP is organized as follows:

- Introduction: This section, which describes the purpose of the plan;
- Site Description: Describes the site location, layout, and history;
- Emergency Response Roles and Responsibilities: Describes the OU-1 emergency response roles and responsibilities;
- Plan Development and Revisions: Describes pre-emergency planning efforts and the ERP revision process for OU-1;
- Emergency Assessment and Response Strategy: Describes the general emergency assessment and response strategy procedures for OU-1;
- Emergency Notifications: Describes the emergency notification procedures applicable to OU-1;
- Emergency Response Infrastructure and Equipment: Describes site infrastructure and equipment that is pertinent to OU-1 emergency response activities;
- Radiation Safety During Emergencies: Describes radiation safety practices that are applicable to OU-1 during emergencies;
- Post-Response Reporting: Describes the post-response reporting procedures for emergencies that occur in OU-1; and
- Emergency Response Training: Describes the emergency response training that is applicable to OU-1.

## 2.0 SITE DESCRIPTION

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The West Lake Landfill Superfund Site is an approximately 200-acre inactive solid waste disposal facility, located at the physical address 13570 St. Charles Rock Road in the City of Bridgeton, St. Louis County, Missouri. The site is approximately 18 miles northwest of downtown St. Louis, Missouri, approximately one mile north of the intersection of Interstate 70 and Interstate 270, and approximately one-and-three-quarters (1.75) miles west-northwest of the St. Louis Lambert International Airport. The Missouri River is approximately one-and-a-half (1.5) miles to the west of the site. Industrial properties are located on and adjacent to the site, and commercial and residential properties are located near its perimeter. The site's location is illustrated on **Figure 1**, along with the locations of local fire district facilities and hospitals.

The general layout of the site is illustrated on **Figure 2**. The site is divided into three Operable Units. OU-1 is the subject of this ERP and includes areas with radiologically impacted materials (RIM). OU-1 is comprised of the following areas:

- **Radiological Area 1 (Area 1):** This approximately 17.6-acre area is located in the eastern-to-northeastern portion of the site, immediately southwest of the site's main entrance from St. Charles Rock Road. Area 1 was associated with unregulated landfill operations conducted at the site prior to the commencement of state regulations in 1974. Radionuclides are present in and on the soils and waste materials that have become interspersed within the landfill matrix. The southwestern portion of Area 1 is overlain by 40 to 45 feet of more recent, non-RIM-containing waste materials (referred to as the "muffin top" or "mound"). These materials were placed above-grade between 2002 and 2004 in the North Quarry portion of the Bridgeton Landfill (see below). Due to the disposal of these more recent waste materials, some areas contaminated with RIM occur at depths of up to 85 feet in the southwestern portion of Area 1.
- **Radiological Area 2 (Area 2):** This approximately 41.8-acre area is located in the northwestern portion of the site. Area 2 was also associated with unregulated landfill operations conducted at the site prior to the commencement of state regulations in 1974. Radionuclides are present in and on soils and waste materials that have become interspersed within the landfill matrix.
- **Buffer Zone:** This approximately 1.8-acre strip of property is located immediately west-southwest of Area 2. The property was acquired by the landfill operator in 2001 after it was discovered that radiologically-impacted soils had eroded from Area 2 and onto the property.
- **Lot 2A2 (Crossroads Properties, LLC):** This approximately 3.6-acre privately-owned commercial property is located immediately west-northwest of the Buffer Zone and immediately southwest of the northern portion of Area 2. It has been determined that radiologically-impacted soils have also eroded from Area 2 and onto the Lot 2A2 property.

A Non-Combustible Cover (NCC) was installed over portions of OU-1 Area 1 and Area 2 (as well as the Buffer Zone) in 2016, with additional installation occurring in some steeply-sloped portions of Area 2 in 2018. The NCC installation was performed pursuant to the EPA's December 9, 2015 Unilateral Administrative Order (UAO) (EPA 2015). The NCC was installed over those portions of OU-1 where RIM was present at or near the ground surface. The cover design consists of a graded 8-in.-thick limestone gravel layer overlaying a non-woven geotextile. The extent of the NCC in Area 1 and Area 2 (including the Buffer Zone) is illustrated on **Figures 3** and **4**, respectively.

**OU-2** includes those areas where RIM has not been identified. It is comprised of the following areas: a Closed Demolition Landfill in the northeastern portion of the site; an Inactive Sanitary Landfill in the western portion of the site; and a Former Active Sanitary Landfill, also known as Bridgeton Landfill, in the eastern and southern portion of the site. As noted above, waste materials were placed above-grade in the North Quarry portion of

Bridgeton Landfill, over the southwestern portion of what is now OU-1 Area 1. In accordance with the July 25, 2008 Record of Decision (ROD) for OU-2 (EPA 2008), EPA has deferred oversight of the Closed Demolition Landfill and Former Active Sanitary Landfill to the Missouri Department of Natural Resources (MDNR), while EPA remains the lead regulatory agency overseeing the remedy at the Inactive Sanitary Landfill.

Sitewide groundwater is being investigated as a separate Operable Unit, OU-3. A Remedial Investigation (RI) and Feasibility Study (FS) for OU-3 will be implemented pursuant to a February 6, 2019 Administrative Settlement Agreement and Order on Consent (ASAOC) (EPA 2019a).

Also included within the boundaries of the site are several structures and facilities that are not part of the waste disposal areas, including a solid waste transfer station, a leachate pre-treatment plant, and an asphalt batch plant.

Note that the emergency response procedures described in this ERP are applicable only to OU-1. The remainder of the site – including OU-2 and the other structures and facilities – is addressed in the Incident Management Plan (IMP) (Bridgeton Landfill 2019).

## 2.1 OIL STORAGE

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There are no in-use containers within the boundaries of OU-1 with oil storage capacity of 55 gallons or greater. The only container with 55 gallons or more of oil storage capacity within the boundaries of OU-1 is an underground (i.e., completely buried) former diesel tank in Area 1 that is believed to be abandoned (i.e., permanently closed). In accordance with Title 40 of the Code of Federal Regulations (CFR) 112.19(d)(2)(i) and (5), the requirements of 40 CFR Part 112 are not applicable to OU-1, and a Spill Prevention, Control, and Countermeasures (SPCC) Plan is not required for OU-1.

If oil storage (e.g., for fuel and lubricants) is needed during the performance of RD/RA activities, this ERP may be revised as necessary to incorporate the required SPCC Plan.

## 3.0 EMERGENCY RESPONSE ROLES AND RESPONSIBILITIES

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This section describes the OU-1 emergency response roles and responsibilities.

The individuals designated for each of the following emergency response roles – as well as their contact information – are specified on **Table 1**. For ease of access, the designated individuals and their contact information are also reiterated on the emergency response strategies presented in **Appendix A**.

### 3.1 OU-1 PROJECT COORDINATOR

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The OU-1 Project Coordinator has overall responsibility for the implementation of the OU-1 RD/RA. For the RD, this individual will interface between the Environmental Protection Agency (EPA) and the OU-1 Respondents: Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC, and the Department of Energy. Because the Respondents are still negotiating the Consent Decree and participation in the RA with EPA, the ERP and designated personnel may change at the RA stage, depending on the party(ies) conducting RA. The ERP will be revised with EPA's permission at the appropriate time to reflect any such changes.

### 3.2 EMERGENCY RESPONSE MANAGER

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The OU-1 Emergency Response Manager has overall responsibility for emergency response at OU-1. This individual will report to the Project Coordinator and ensure that the procedures described in this ERP are followed. The Emergency Response Manager is responsible for initial emergency assessment and coordination of emergency response activities for OU-1. If the Emergency Response Manager is not available, one of the Alternates listed on **Table 1** may fulfill their responsibilities.

### 3.3 RADIATION SAFETY OFFICER

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The OU-1 Radiation Safety Officer has responsibility for OU-1 radiation protection practices. This individual will report to the Emergency Response Manager and will coordinate with first responders and assist them with the implementation of radiation safety practices as necessary and appropriate during an emergency. If the Radiation Safety Officer is not available, the Alternate listed on **Table 1** may fulfill their responsibilities.

### 3.4 SUPPORT CONTACTS

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The Support Contacts are personnel associated with Bridgeton Landfill. The OU-1 Emergency Response Manager may coordinate with the Support Contacts as needed to procure assistance and resources when responding to emergencies.



## 4.0 PLAN DEVELOPMENT AND REVISIONS

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This section describes pre-emergency planning efforts and the ERP revision process for OU-1.

This ERP has been developed based in part on the current IMP (Bridgeton Landfill 2019) for the larger West Lake Landfill Superfund Site. The IMP was developed pursuant to the UAO (EPA 2015), which required that the facility prepare an IMP for OU-1. The IMP that was eventually prepared incorporated the entirety of the West Lake site, including OU-1, and was based in part on a plan originally developed for the Bridgeton Landfill (CEC 2015). The IMP was developed in close consultation with local and regulatory authorities, including emergency responders. Since it was first submitted on March 21, 2016, the IMP has been revised multiple times, based on changes to site conditions and activities, and on comments provided by the local and regulatory authorities.

Within 30 days of EPA Region 7 approval of this ERP, the plan will be submitted with a request for comments to the first responders listed on **Table 1**. The OU-1 Emergency Response Manager will coordinate with these first responders to ensure that their comments on the ERP are implemented. This may include a webinar, teleconference, or in-person meeting with the first responders at the Bridgeton Landfill office (or other agreed-upon venue) to review any submitted comments and discuss their implementation. The Emergency Response Manager will coordinate with EPA Region 7 regarding any such “post-approval” revisions based on comments from first responders.

Thereafter, the Emergency Response Manager will conduct routine ERP meetings with the first responders listed on **Table 1** and EPA Region 7. These meetings will be held at the Bridgeton Landfill office (or other agreed-upon venue) on – at minimum – a quarterly basis. During these meetings, the OU-1 first responders and Support Contacts listed on **Table 1** will convene to review site conditions, activities, emergencies from the past quarter (if any), and work planned for the next quarter. Any notes generated during an ERP meeting will be compiled and distributed to the invited regulatory and local authorities within 7 days of the meeting. Based on the result of the ERP meeting, changes will be incorporated into the ERP, if needed, and the revised plan then distributed to the OU-1 first responders and EPA Region 7 personnel within 30 days of the meeting. The Emergency Response Manager will have responsibility for distributing meeting notes and any ERP revisions.

ERP first responder meetings may be needed on a more frequent basis during RD and RA activities, depending on the nature of the activities and the rate at which site conditions or activities change. The OU-1 Emergency Response Manager will review the ERP on a quarterly basis to ensure the information in the document is still current.

It is anticipated that the ERP will be revised at certain points during the RD / RA process as the RD / RA activities are defined in greater detail and the party(ies) conducting RA are confirmed. Specifically, it is anticipated that major revisions to the ERP will likely be submitted concurrently with the following deliverables specified in the SOW:

- **Design Investigation Work Plan (DIWP) (SOW Deliverable #8):** The ERP will be updated to reflect the planned design investigation field activities described in the DIWP and its supporting deliverables, in particular the Field Sampling Plan (FSP) (SOW Deliverable #9) and Health and Safety Plan (HASP) (SOW Deliverable #11). The update will include a discussion of any design investigation activities that could potentially affect emergency responders.
- **Site Wide Monitoring Plan (SWMP) (SOW Deliverable #14):** The ERP will be updated to reflect the planned site monitoring field activities described in the SWMP. The update will include a discussion of any site monitoring activities that could potentially affect emergency responders.

- **Pre-Final (90%) Remedial Design (90% RD) (SOW Deliverable #21):** Per SOW Paragraph 3.8(b), the ERP will be updated to reflect the planned RA activities described in the 90% RD and its supporting deliverables, in particular the Operation & Maintenance Plan (O&M Plan) (SOW Deliverable #18). The update will include a discussion of any RA activities that could potentially affect emergency responders.
- **Draft Final (100%) Remedial Design (100% RD) (SOW Deliverable #22):** Per SOW Paragraph 3.9, the 100% RD will include final versions of all RD deliverables, including the ERP. The ERP will be updated at this point to reflect any EPA comments on the (90% RD).

As with the initial version of this ERP (see above) within 30 days of EPA approval of a revised version of the ERP, the plan will be submitted with a request for comments to the regulatory and local authorities listed on **Table 1**.

Note that the site's current IMP will be revised to reflect the fact that emergency response for OU-1 will be addressed by this ERP once it has been approved and formally adopted. The IMP will continue to address the remainder of the site, including OU-2 and the other structures and facilities. Note that the site will hold quarterly IMP review meetings with many of same first responders listed on **Table 1**, in accordance with the requirements of the IMP. During these IMP review meetings, Bridgeton Landfill personnel will discuss site conditions, activities, and incidents from the past quarter (if any) for the non-OU-1 portions of the site. For the convenience of the first responders, the quarterly ERP review meeting may occur immediately before or after the quarterly IMP meeting at the Bridgeton Landfill office (or other agreed-upon venue).

## 5.0 EMERGENCY ASSESSMENT AND RESPONSE STRATEGY

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This section describes the general emergency assessment and response strategy procedures for OU-1.

### 5.1 INITIAL NOTIFICATION

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Individuals who perform work within or near the boundaries of OU-1 – including OU-1 site workers, Bridgeton Landfill personnel, contractors, and visiting regulatory and local authorities – must notify the OU-1 Emergency Response Manager if they observe a potential emergency situation. The OU-1 Emergency Response Manager is responsible for initial emergency assessment and coordination of emergency response activities for OU-1. After any on-site personnel are notified of the existence of a potential emergency, the Emergency Response Manager will be the first individual notified. As indicated on the emergency response strategies presented **Appendix A**, Bridgeton Landfill Support Contacts will also be notified as a part of each response action.

*Note: The exception is that during a Level 1 emergency (see “Emergency Assessment” below) the 9-1-1 operator will often be the first individual notified, per the emergency response strategies presented in **Appendix A**. In such instances, the OU-1 Emergency Response Manager will be notified immediately after notifying 9-1-1, as indicated on the appropriate strategies.*

In the event of an emergency, the OU-1 Emergency Response Manager will be notified by phone. The OU-1 Emergency Response Manager’s cell phone number will be posted on a gate placard at the Area 1 and Area 2 primary entrances (see “Site Entrances” under “Emergency Response Infrastructure and Equipment” below). In addition, laminated copies of **Table 1** and the emergency response strategies presented **Appendix A** – which include the cell phone number of the Emergency Response Manager – will be posted in both the Area 1 and Area 2 trailers. The forthcoming Health and Safety Plan (HASP) (SOW Deliverable #11) will also include the OU-1 Emergency Response Manager’s contact information.

During their initial site / project orientation, workers performing activities within OU-1 (including contractors) will be instructed to notify the Emergency Response Manager via phone in the event of a potential emergency. Laminated copies of **Table 1** and the emergency response strategies presented **Appendix A** – which include the cell phone number of the Emergency Response Manager -- will be provided to OU-1 workers. One complete set of laminated copies will be provided for each field vehicle operating within OU-1. These laminated sets will be stored in the Area 1 and Area 2 trailers when not in use.

Local authorities will be instructed to notify the Emergency Response Manager via phone in the event of a potential OU-1 emergency. The local authorities will be involved in the initial development and regular review of this ERP (see “Plan Development and Revisions” above) and will accordingly be provided with copies of the most up-to-date version of the plan, including the contact information for the Emergency Response Manager.

Bridgeton Landfill personnel and other site personnel (including contractors) will also be instructed to notify the Emergency Response Manager via phone in the event of a potential OU-1 emergency. Copies of **Table 1** and the emergency response strategies presented in **Appendix A** will be posted at the Bridgeton Landfill office and laminated copies will be maintained for distribution to personnel as needed. Following EPA Region 7 approval of this ERP, the *Bridgeton Landfill Health and Safety Plan* (Bridgeton Landfill 2016) will also be updated to include notification instructions and contact information for the OU-1 Emergency Response Manager.

## 5.2 9-1-1 / SPILL LINE CALLS

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If an individual associated with OU-1 or other portions of the site (e.g. Bridgeton Landfill) makes a call to 9-1-1, the EPA spill line, or MDNR spill line, that individual will also immediately notify the OU-1 Emergency Response Manager after notifying 9-1-1. If a call to 9-1-1 or a spill line is made by an individual outside OU-1 or other portions of the site (e.g., a member of the public), the 9-1-1 / spill line operator may notify the OU-1 Emergency Response Manager. During the development of the site's current IMP, the site requested of regulatory and local authorities that the 9-1-1 / spill line operator make this notification in such situations.

## 5.3 EMERGENCY ASSESSMENT

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An emergency is a situation that is non-routine or anomalous and which poses a potential threat to the health and safety of on-site personnel or the public. The Emergency Response Manager (or their Alternate) is responsible for making the initial determination as to whether a given situation occurring at OU-1 rises to the level of an emergency.

The OU-1 Emergency Response Manager (or their Alternate) will be on call 24 hours a day, 7 days a week throughout the RD and RA phases of the project. In the event of an emergency, the Emergency Response Manager (or their Alternate) will be available to arrive at the site within approximately six hours or less of initial notification via phone (see "Initial Notification" above). A Support Contact for Bridgeton Landfill (i.e., the Bridgeton Landfill Division Manager or their Alternate) will also be on call 24 hours a day, 7 days a week throughout the RD and RA phases of the project. In the event of an emergency, the OU-1 Emergency Response Manager will notify and coordinate with this Support Contact by phone, per the emergency response strategies presented in **Appendix A**.

If the Emergency Response Manager (or their Alternate) is on site at the time a potential emergency is first identified, they will perform this initial assessment on site, supported by any relevant observations from other individuals. If the Emergency Response Manager (or their Alternate) is not on site at the time a potential emergency is first identified, they may perform this initial assessment from off-site based on information related to them by phone from the individual who performs the initial notification (see "Initial Notification" above). Even if the initial assessment is performed from off site, the Emergency Response Manager (or their Alternate) will mobilize to the site to provide further evaluation and coordination with emergency responders.

Once a determination has been made that an emergency is occurring at OU-1, the Emergency Response Manager will make an initial assessment of the emergency and classify its **category** and **severity**.

Four categories of potential emergencies have been identified for OU-1:

- Incoming Call to 9-1-1 / EPA Spill Line / MDNR Spill Line
- Personal Injury / Man Down / Personnel Contamination
- Sudden Waste Movement / Exposed Waste
- Surface Fire (Vegetation or Landfill Fire)

If site conditions or RD/RA activities change such that new categories of potential emergencies are applicable to OU-1, this ERP may be revised as necessary to reflect those categories.

The severity of the emergency is classified as Level 0 or Level 1:

- **Level 0 Emergency:** An emergency that can be addressed entirely by on-site support personnel and equipment, if requested by the Emergency Response Manager. In some cases, notification to local and regulatory authorities may be necessary.

- **Level 1 Emergency:** An emergency that requires the assistance of local authorities to address. May include emergencies with potential to harm the health or safety of on-site personnel.

## 5.4 EMERGENCY RESPONSE STRATEGY

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Once the Emergency Response Manager has determined category and severity of the emergency, the appropriate response strategy will be selected, and the listed response actions will be performed in the designated order. A response strategy for each of the potential emergency categories listed above is presented in **Appendix A**. These response strategies include actions for Level 0 emergencies and actions for Level 1 emergencies (if applicable).

If more than one strategy is applicable to an emergency situation (e.g., the Sudden Waste Movement / Exposed Waste strategy and Surface Fire strategy for exposed burning waste), the most responsive strategy will be used.

The Emergency Response Manager has responsibility for ensuring that the response actions listed on the appropriate response strategy are performed, and that they are performed in the listed order. A checklist for the emergency assessment process and the implementation of emergency response strategies is presented in **Appendix B**.

In the event of a Level 1 emergency involving a response from local authorities (such as a sudden waste movement or surface fire), those authorities will designate an Incident Commander to represent them and to coordinate all local authority response activities. The Incident Commander will designate an on-site Command Center location – outside the boundaries OU-1 – from which response activities will be coordinated.

## 6.0 EMERGENCY NOTIFICATIONS

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This section describes the emergency notification procedures applicable to OU-1.

Each of the emergency response strategies presented in **Appendix A** includes notification actions to local and regulatory authorities. These notification actions must be performed in the order listed on the response strategies. For ease of access, contact information for local and regulatory authorities is presented directly on the response strategies.

The Emergency Response Manager has responsibility for ensuring that the notification actions listed on the appropriate response strategy are performed, and that they are performed in the listed order.

Local and regulatory authorities – along with their contact information – are also listed on **Table 1** for reference.

### 6.1 HAZARDOUS SUBSTANCE RELEASE

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Pursuant to the Title 42 of the United States Code (USC) § 9603, the National Response Center must be notified in the event of the release of a reportable quantity (as defined by 42 USC § 9602) of a hazardous substance. The National Response Center hotline number is listed on **Table 1**. Pursuant to 42 USC § 11004, the community emergency coordinator must also be notified in the event of an applicable release (per §11004(a)). Contact information for the St. Louis County Office of Emergency Management (OEM) is presented on **Table 1**, as well as on the applicable emergency response strategies in **Appendix A**.

In the event of such a hazardous substance release at, on, or from OU-1, the EPA Project Coordinator will also be immediately notified orally, in accordance with the requirements of SOW Paragraph 3.10(b). Contact information for the EPA Project Coordinator is presented on **Table 1**.

### 6.2 WASTE MATERIAL RELEASE

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In the event of a waste material release at, on, or from OU-1, the EPA Project Coordinator will be immediately notified orally, in accordance with the requirements of SOW Paragraph 3.10(a). Contact information for the EPA Project Coordinator is presented on **Table 1**.

## 7.0 EMERGENCY RESPONSE INFRASTRUCTURE AND EQUIPMENT

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This section describes site infrastructure and equipment that is pertinent to OU-1 emergency response activities.

The larger West Lake site – with the exception of the borrow area – is enclosed by fencing, and access to the site is controlled by Bridgeton Landfill. Access to OU-1 Area 1, Area 2, and the Buffer Zone is also further controlled. These OU-1 areas are enclosed by chain-link fences that are approximately six feet in height and topped with three strands of barbed wire. There are no permanent structures inside the OU-1 fence lines; only shipping containers (CONEX boxes) used for storage of dedicated site equipment and investigative soil/waste cores. The only substantial infrastructure within OU-1 consists of gravel access roads and the NCC. A septic holding tank for the Bridgeton Landfill site office is located just inside the northern fence line of Area 1, but this tank is accessed from outside Area 1. Area 1 and Area 2 each have an office trailer located just outside the fence line, near each area's respective primary entrance. Site features for Area 1 are illustrated on **Figure 3**. Site features for Area 2 and the Buffer Zone are illustrated on **Figure 4**.

There are presently no ongoing waste disposal activities occurring within OU-1. Workers only enter OU-1 to perform routine inspection and maintenance activities (e.g., inspection of the NCC) or to perform activities that are part of the OU-1 RD/RA.

### 7.1 SITE ENTRANCES

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The entrances to Area 1 are illustrated on **Figure 3**. The primary foot and vehicle entrance to Area 1 is a 20-ft gate on the southern side of the area's fence line. There are also three emergency exits at various locations: a 6-ft gate at the northwest corner; and two 20-ft gates on the north side, accessible from the larger West Lake site's main entrance and parking area.

The entrances to Area 2 are illustrated on **Figure 4**. The primary foot and vehicle entrance to Area 2 is a 20-ft gate on the southeastern side of the area's fence line. There are also five emergency exits at various locations: a 12.5-ft gate near the southwestern corner, accessible from Boenker Lane / Old St. Charles Rock Road; a 20-ft gate at the southwest end of the Buffer Zone, accessible from Boenker Lane / Old St. Charles Rock Road; a 3-ft gate near the northern corner; a 3-ft gate on the northern side, accessible from St. Charles Rock Road; and a 6-ft gate near the northeastern corner.

Signage on the primary entrance gates for Area 1 and Area 2 indicates that there is no entry without proper authorization. The primary entrances and emergency exits for Area 1 and Area 2 are kept closed and padlocked when not in use. These padlocks keys are maintained by the OU-1 Radiation Safety Officer.

Emergency key boxes containing a spare padlock key will be maintained near each emergency exit in OU-1 Area 1 and Area 2. These key boxes will be located approximately 10 feet from the corresponding emergency exit, such that the key is accessible to an individual inside (but not outside) the OU-1 fence line. Key boxes will be installed and maintained such that they are clearly visible and clear of vegetation. In an emergency, the key stored in the emergency key box will allow evacuating individuals to unlock and exit through the corresponding emergency exit.

In the event of an emergency inside OU-1, any workers present will proceed to the primary entrance, if possible, and exit OU-1. If egress is not possible via the primary entrance, workers will proceed to the nearest



emergency exit, unlock it, and exit OU-1. The locations of the primary and secondary entrances to the larger West Lake Landfill Superfund Site are illustrated on **Figure 5**. Once workers have been evacuated from OU-1, they can be evacuated from the larger West Lake site at these locations, if necessary.

In the event of an emergency, first responders are expressly permitted to gain access to OU-1 using appropriate measures, such as cutting of gate locks.

## 7.2 ROADS

---

The emergency access road plan for the site is illustrated on **Figure 5**. This figure illustrates the names and locations of the site's native roads (i.e., roads not constructed on waste). Per first responder comments during past IMP revisions, it is understood that responders' preference is for emergency vehicles to be restricted to native roads for structural / stability reasons. **Figure 5** also distinguishes between roads that are passable to both tractor trailers and fire trucks and those that are passable only to fire trucks, based on turning radius modeling performed during the IMP development process. Signage installed around the site indicates the road names and delineates the native roads to provide emergency responders with a visual reference in the field.

There are no native roads within the boundaries of OU-1, but native road access is available at the perimeter of each OU-1 area, as illustrated on **Figure 5**. The nearest native road access to OU-1 Area 1 is along the area's northern fence line, which runs along the West Lake Landfill Superfund Site's main entrance and parking area. The nearest native road access to OU-1 Area 2 is at the area's primary entrance on the southeastern side of the area's fence line.

It is anticipated that site infrastructure – including roads within and around OU-1 – may change significantly at various points during the RD and RA phases of the project. As described under “Plan Development and Revisions” above, the ERP will be revised as the RD / RA activities are defined in greater detail in future SOW-required deliverables. It is anticipated that revisions to the site's road network will be addressed in the revised ERPs submitted concurrently with the Design Investigation Work Plan (SOW Deliverable #8) and Pre-Final (90%) Remedial Design (SOW Deliverable #21), and potentially in other revised versions of the plan, as necessary. As a part of these revisions, the planned road infrastructure will be reevaluated regarding their suitability for use by emergency response personnel and equipment.

## 7.3 FIRE HYDRANTS

---

The locations of the site's four on-site fire hydrants – as well as off-site fire hydrants near the site – are illustrated on **Figure 5**. Signage installed around the site indicates the on-site fire hydrant locations, to provide emergency responders with a visual reference in the field.

## 7.4 EMERGENCY COMMUNICATION AND MEET-UP LOCATIONS

---

In the event of an emergency, individuals will use their personal cell phones or, if needed, personal two-way radios for internal communication within OU-1 or for communication between individuals inside and outside OU-1. As noted under “Emergency Assessment” in the “Emergency Response Strategy and Assessment” section above, a Support Contact for Bridgeton Landfill (i.e., the Bridgeton Landfill Division Manager or their Alternate) will be on call 24 hours a day, 7 days a week throughout the RD and RA phases of the project. In the event of an emergency, this Support Contact can be contacted by phone for the purposes of coordinating access to particular site areas or equipment.



During the RD phase of the project, worker access to OU-1 will be overseen by the Radiation Safety Officer. The Radiation Safety Officer will be responsible for maintaining a sign-in / sign-out log for OU-1 Area 1 and Area 2. The Radiation Safety Officer will maintain possession of this log while work is being performed inside OU-1; the log will otherwise be kept at the Radiation Safety Officer's off-site office. Prior to entry, each OU-1 site worker will record their name, affiliation, cell phone number, area (1 or 2) and the current date and time in the log. Upon exiting OU-1, each worker will again record the current date and time. In the event of an emergency, the Emergency Response Officer (or their Alternate) will coordinate with the Radiation Safety Officer and refer to the sign-in / sign-out log to determine which workers are currently present within OU-1, and, if necessary, use the listed cell phone numbers to contact individual workers.

During an emergency, evacuated OU-1 workers will meet up at designated locations according to the following priority list:

- **Primary Emergency Meet-Up Location:** If possible, evacuated workers will meet up at the trailer immediately outside the Area 1 or Area 2 primary entrance (as appropriate).
- **Secondary Emergency Meet-Up Location:** If the applicable OU-1 trailer is inaccessible, evacuated workers will meet up at the Bridgeton Landfill office.
- **Tertiary Emergency Meet-Up Location:** If the Bridgeton Landfill office is inaccessible, the evacuated workers will meet up at the Forshaw Earth City Warehouse (13200 Corporate Exchange Drive), located off-site to the immediate south of the facility.

The emergency meet-up locations are indicated on **Figure 2**. Workers performing activities within OU-1 will be instructed as to these primary, secondary, and tertiary emergency meet-up locations during their initial site / project orientation.

It is anticipated that site communication, personnel tracking, and emergency meet-up procedures will change during the RA phase of the project. As described under "Plan Development and Revisions" above, the ERP will be revised as the RA activities are defined in greater detail in future SOW-required deliverables. It is anticipated that revisions to this section will be addressed in the revised ERP submitted concurrently with the Pre-Final (90%) Remedial Design (SOW Deliverable #21) – and potentially in other revised versions of the plan, as necessary.

## 7.5 ON-SITE EMERGENCY RESOURCES

---

**Table 2** lists other on-site resources which are available for OU-1 emergency response activities, including heavy equipment, vehicles, personal protective equipment (PPE), and field instruments. The table distinguishes between 1) those resources available inside OU-1, in the office trailers located just outside the OU-1 fence lines, or in the OU-1 Radiation Safety Officer's off-site office; and 2) those resources which are affiliated with the larger West Lake site (including Bridgeton Landfill) but are available for emergency response activities in OU-1 if needed.

In the event of emergency in OU-1, support personnel affiliated with the Bridgeton Landfill can commit these resources and potentially provide emergency response support at the request of the Emergency Response Manager. These support personnel are listed along with their contact information on **Table 1**.

## 8.0 RADIATION SAFETY DURING EMERGENCIES

---

This section describes radiation safety practices that are applicable to OU-1 during emergencies. The Radiation Safety Officer (or their Alternate) will coordinate with first responders and assist them with the implementation of these radiation safety practices as necessary and appropriate during an emergency.

### 8.1 PRIORITIES DURING EMERGENCY RESPONSE

---

When an emergency occurs within the boundaries of OU-1, it is recommended that the following priorities be followed in the listed order during the performance of emergency response activities:

1. If possible, the emergency should be addressed from outside the boundaries of OU-1.
2. If entry into OU-1 is necessary to respond to an emergency, vehicles and personnel should, if possible, be confined to those portions of OU-1 covered by rock, i.e., gravel access roads and the NCC. The extent of the NCC in Area 1 and Area 2 (as well as the Buffer Zone) is illustrated on **Figures 3** and **4**, respectively.
3. If entry into portions of OU-1 that are not covered by rock is necessary, personnel should use the applicable PPE to the extent possible. The applicable PPE constitutes a Level D ensemble (work boots with steel toe and shank; high-visibility vest or shirt; hard hat; and safety glasses) plus the following equipment:
  - Tyvek coveralls;
  - Taped rubber gloves; and
  - Taped rubber booties

Tyvek coveralls, rubber gloves, and rubber boots are available in the office trailers located just outside the fence lines for OU-1 Area 1 and Area 2. The locations of the Area 1 and Area 2 trailers are illustrated on **Figure 3** and **Figure 4**, respectively. The Area 1 and Area 2 trailers are not locked, and emergency responders may freely access the PPE stored there. In addition, the OU-1 Radiation Safety Officer should be contacted to coordinate the provision of any additional PPE that may be needed by emergency response personnel who need to enter OU-1.

During an emergency, emergency responders and their equipment will not be subject to radiation safety frisking prior to entry into OU-1. The Radiation Safety Officer will coordinate the frisking and (if necessary) decontamination of emergency personnel and equipment during egress from OU-1, unless there is a life-threatening injury or other extenuating circumstance (e.g., an imminent need to evacuate the West Lake site).

Currently, frisking and decontamination procedures are performed in accordance with the requirements of the Radiation Safety Plan (RSP) prepared for the installation of the NCC (Auxier 2016). Frisking and decontamination procedures specific to the RD / RA will be detailed in the RSP that will be included in the forthcoming HASP (SOW Deliverable # 11). These procedures will supersede those devised and implemented for NCC installation and maintenance activities.

If an individual working inside OU-1 needs to be transported to a hospital during an emergency, their PPE will be removed prior to transport (if possible) and the Radiation Safety Officer will notify the hospital.

### 8.1.1 Emergencies Requiring Air Monitoring

---

If an emergency occurs in OU-1 that involves a potential for the release of radionuclide-containing dust, monitoring data obtained from the OU-1 air monitoring program will be collected and evaluated to assess the potential for a release and any impacts that may have been associated with such a release. These monitoring results will be provided to the EPA. Full details on the OU-1 air monitoring program are presented in the Air Monitoring, Sampling, and QA/QC Plan (Auxier 2014). Note that this plan is currently being revised in accordance with the EPA's August 15, 2019 comment letter. It is anticipated that this section of the ERP will be revised following approval of that revised plan, which will also be included as an appendix to the OU-1 Site Management Plan.

### 8.1.2 Emergencies Requiring Water Application

---

The NCC that has been constructed over surface RIM in OU-1 Area 1 and Area 2 includes a non-woven geotextile overlain by 8 in. of limestone gravel. Accordingly, surface RIM is not currently exposed in such a manner that allows for the transport of this material via surface runoff.

If emergency response activities performed in OU-1 involve the application of water that could run off the surface of OU-1 (e.g., the use of water to suppress a vegetation fire), best management practices (BMPs) such as the application of straw wattles will be used to mitigate the potential transport of small quantities of non-RIM-containing surface soils from OU-1 to other areas. In the event of extreme circumstances – e.g., emergency application of an extremely high volume of water that results in significant disturbance of the NCC – the site will implement appropriate and practicable corrective action measures to contain, divert, pump, and/or store potential runoff.

## 9.0 POST-RESPONSE REPORTING AND ACTIONS

---

This section describes the post-response reporting procedures for emergencies that occur in OU-1.

As soon as reasonably possible after an emergency and associated response activities, the OU-1 Emergency Response Manager will prepare a written Post-Response Report. This report will include, at minimum:

- The name, address, and contact information for the site;
- The date, time, category, severity, and general description of the type of emergency (e.g., fire injury, etc.);
- The name and quantity of any hazardous materials released as a result of the emergency, as well as the estimated quantity and disposition of any recovered materials;
- An assessment of any actual or potential hazards to human health or the environment resulting from the emergency;
- A description of the steps taken to respond to the emergency and to ensure the health and safety of on-site personnel and the public; and
- An initial evaluation of the potential cause of the emergency and recommendations for preventing such an event in the future, if possible.

Within 15 days of a Level 1 emergency, the Emergency Response Manager will submit the Post-Response Report to EPA and, as appropriate, other regulatory and local authorities. In the case of a Level 0 emergency, the Post-Response Report may be submitted to EPA and other regulatory and local authorities at the discretion of the Emergency Response Manager, or as circumstances may otherwise dictate. In all instances, a copy of the Post-Response Report will be retained at the Bridgeton Landfill office for five years.

In the event of a hazardous substance or waste material release from OU-1, the Post-Response Report will meet the EPA reporting requirements specified in SOW Paragraph 3.10(d).

If an emergency (or the response to an emergency) results in a breach in the NCC, the cover will be repaired to its original specifications unless otherwise approved by the EPA.

## 10.0 EMERGENCY RESPONSE TRAINING

---

This section describes the emergency response training that is applicable to OU-1.

Site workers that enter OU-1 must complete 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training (including annual 8-hour refreshers) as specified in 29 CFR 1910.120. Site workers that enter OU-1 must also undergo General Employee Radiation Training (GERT) every two years. Contractors and other temporary workers can enter OU-1 without completing HAZWOPER and GERT training if they are accompanied by a worker who has completed the training. All workers that enter OU-1 should also read this ERP and familiarize themselves with its contents prior to beginning work inside the boundaries of OU-1.

It is recommended that emergency responders who enter OU-1 should also have completed 40-hour HAZWOPER training and radiation safety training that is comparable to GERT.

It is anticipated any additional health and safety training that is required for the OU-1 RD/RA process will be further defined in the HASP (Deliverable 11 on the RD Schedule presented in SOW Paragraph 6.2).

## 11.0 REFERENCES

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- Auxier. 2014. Air Monitoring, Sampling, and QA/QC Plan, West Lake Superfund Site Operable Unit 1. Prepared by Auxier & Associates, Inc. October 2014.
- Auxier. 2016. Radiation Safety Plan for Installation of Non-Combustible Cap. West Lake Landfill Operable Unit 1. Prepared by Auxier & Associates, Inc. January 4, 2016
- Bridgeton Landfill. 2016. Bridgeton Landfill Health and Safety Plan. Prepared by Bridgeton Landfill LLC. 2016.
- Bridgeton Landfill. 2019. Incident Management Plan (IMP) with Contingency Plan and Emergency Procedures. Prepared by Bridgeton Landfill LLC. March 28, 2019 (Revised).
- CEC. 2015. Incident Management Plan with Contingency Plan and Emergency Procedures, Bridgeton Landfill. Prepared by Civil & Environmental Consultants, Inc. June 10, 2015.
- EPA. 2008. *Record of Decision (ROD), West Lake Landfill Site, Operable Unit 2. U.S. Environmental Protection Agency, Region 7.* July 25, 2008.
- EPA. 2015. *Unilateral Administrative Order (UAO) for Removal Action. U.S. Environmental Protection Agency, Region 7.* Docket No. CERCLA-07-2016-0002. December 9, 2015.
- EPA. 2019a. *West Lake Landfill OU-3, Administrative Settlement and Order on Consent (ASAOC) for Remedial Investigation / Feasibility Study. U.S. Environmental Protection Agency, Region 7.* Docket CERCLA-07-20018-0259. February 2, 2019.
- EPA. 2019b. *Remedial Design Statement of Work (SOW), Operable Unit-1, West Lake Landfill Superfund Site. In: Third Amendment to Administrative Settlement Agreement and Order on Consent (ASAOC). U.S. Environmental Protection Agency, Region 7.* Docket VII-93-F-0005. May 6, 2019
- .

## Tables

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**Table 1**  
**Emergency Response Roles and Contact Information**

OU-1 Emergency Response Roles		
EMERGENCY RESPONSE ROLE	DESIGNATED INDIVIDUAL	CONTACT INFORMATION
OU-1 Project Coordinator	Paul Rosasco - Engineering Management Support, Inc.	Cell: 303-808-7227
Emergency Response Manager	Daniel Feezor - Feezor Engineering, Inc.	Cell: 217-836-8842
Alternate Emergency Response Manager 1	Bill Abernathy - Feezor Engineering, Inc.	Cell: 314-502-1299
Alternate Emergency Response Manager 2	Jon Wilkinson - Feezor Engineering, Inc.	Cell: 636-578-8635
Radiation Safety Officer	Bill Abernathy - Feezor Engineering, Inc.	Cell: 314-502-1299
Alternate Radiation Safety Officer	Jon Wilkinson - Feezor Engineering, Inc.	Cell: 636-578-8635

Support Contacts		
SUPPORT CONTACT	NAME	CONTACT INFORMATION
Bridgeton Landfill Division Manager	Erin Fanning	Cell: 209-227-9531
Alternate Bridgeton Landfill Contact 1	Mike Lambrich	Cell: 314-683-3921
Alternate Bridgeton Landfill Contact 2	Dana Sincox	Cell: 314-313-0838
Alternate Bridgeton Landfill Contact 3	Matt Stewart	Cell: 314-477-6140

Regulatory Authorities		
REGULATORY AUTHORITY	NAME	CONTACT INFORMATION
EPA Region 7 - Regional Project Manager	Christine Jump	Office: 913-551-7141 Cell: 816-398-1965
EPA Region 7 - On-Scene Coordinator	Tom Mahler	Cell: 816-604-0546
EPA Region 7 - Spill Line	-	913-281-0991
MDNR Waste Management Program - Director	Chris Nagel	Office: 573-751-5401 Cell 1: 573-680-5146 Cell 2: 573-690-5371
MDNR Waste Management Program - Compliance/Enforcement Section	Mike Parris	Office: 573-526-3918 Cell: 573-680-6669
MDNR Department of Health and Senior Services	Keith Henke	Cell: 573-645-8943
MDNR Environmental Emergency Response - Spill Line	-	573-634-2436
MDNR Environmental Response - St. Louis Region - Route 66	Mike Ruddy	Office: 636-938-7809 Cell: 314-640-5198
St. Louis County Department of Health	Mark Milward	Office: 314-615-4116 Cell: 314-520-1373

Local Authorities		
LOCAL AUTHORITY	NAME	CONTACT INFORMATION
Robertson Fire Department - Assistant Fire Chief	Maynard Howell	Cell: 314-575-5011
Pattonville Fire Department - Battallion Chief (Primary Contact)	Battallion Chief	Cell: 314-393-4802
Pattonville Fire Department - Assistant Fire Chief (Secondary Contact)	Jim Usry	Cell: 314-393-4807 Office: 314-739-3118
Bridgeton Police Department (Primary Contact)	Chief Donald Hood	Cell: 314-420-9112
Bridgeton Police Department (Secondary Contact)	Major Mossotti	Cell: 314-602-3632
St. Louis County Office of Emergency Management (OEM) - LEPC Coordinator	Mark Diedrich	Office: 314-615-9500
St. Louis County Office of Emergency Management (OEM) - Bureau of Communications	24/7 Emergency Line	314-615-5360

Other Contacts		
OTHER CONTACT	NAME	CONTACT INFORMATION
SSM Health DePaul Hospital	-	314-344-6000
SSM Health St. Joseph Hospital - St. Charles	-	636-947-5000
National Response Center	-	800-424-8802



**Table 2**  
**On-Site Emergency Resources**

West Lake Superfund Site OU-1 Resources

<b>RESOURCE</b>	<b>QUANTITY</b>
Tyvek Coveralls, Rubber Gloves, Rubber Booties *	100+
Ludlum Model 19 microR Gamma Survey Meter †	1
Ludlum Model 2360 Data Logger with 43-93 Alpha-Beta Detector †	1

Other Resources‡

<b>RESOURCE</b>	<b>QUANTITY</b>
Fire Hydrants	4
Soil Stock Pile	10,000 c.y.
Bulldozers	2
Water Truck (3,500-gal. with Cannon)	1
Water Truck Adapter to 5-in. Storz Fitting	1
Excavators	2
Spill Cleanup Kits	18
Eye Wash Stations	8
Portable Fire Extinguishers	66
Knife Gates	18
Vacuum Trucks	1
ATVS (2-Man with Tool Bed)	7
ATVs (4-Man with Tool Bed)	1
UltraRAE 3000 Benzene-Specific Photoionization Detector (PID) Meter	1
RKI GX-2009 Portable 4-Gas Meter	1
RKI GX-6000 Portable 5-Gas Meter with Benzene-Specific PID Meter	1
Class A SFFF (Structural Fire Fighting Foam), 5-gal. Containers	40

Notes

\* Located in OU-1 Area 1 and Area 2 office trailers, just outside OU-1 fence lines.

† Maintained off-site in the Radiation Safety Officer's office, along with check sources for the instruments: 3377 Hollenberg Drive, Bridgeton, MO 63044. See Figure 1 for location.

‡ Resources affiliated with the larger West Lake Landfill Superfund Site (including Bridgeton Landfill). Bridgeton Landfill support contacts can commit these resources during an emergency.

## Figures

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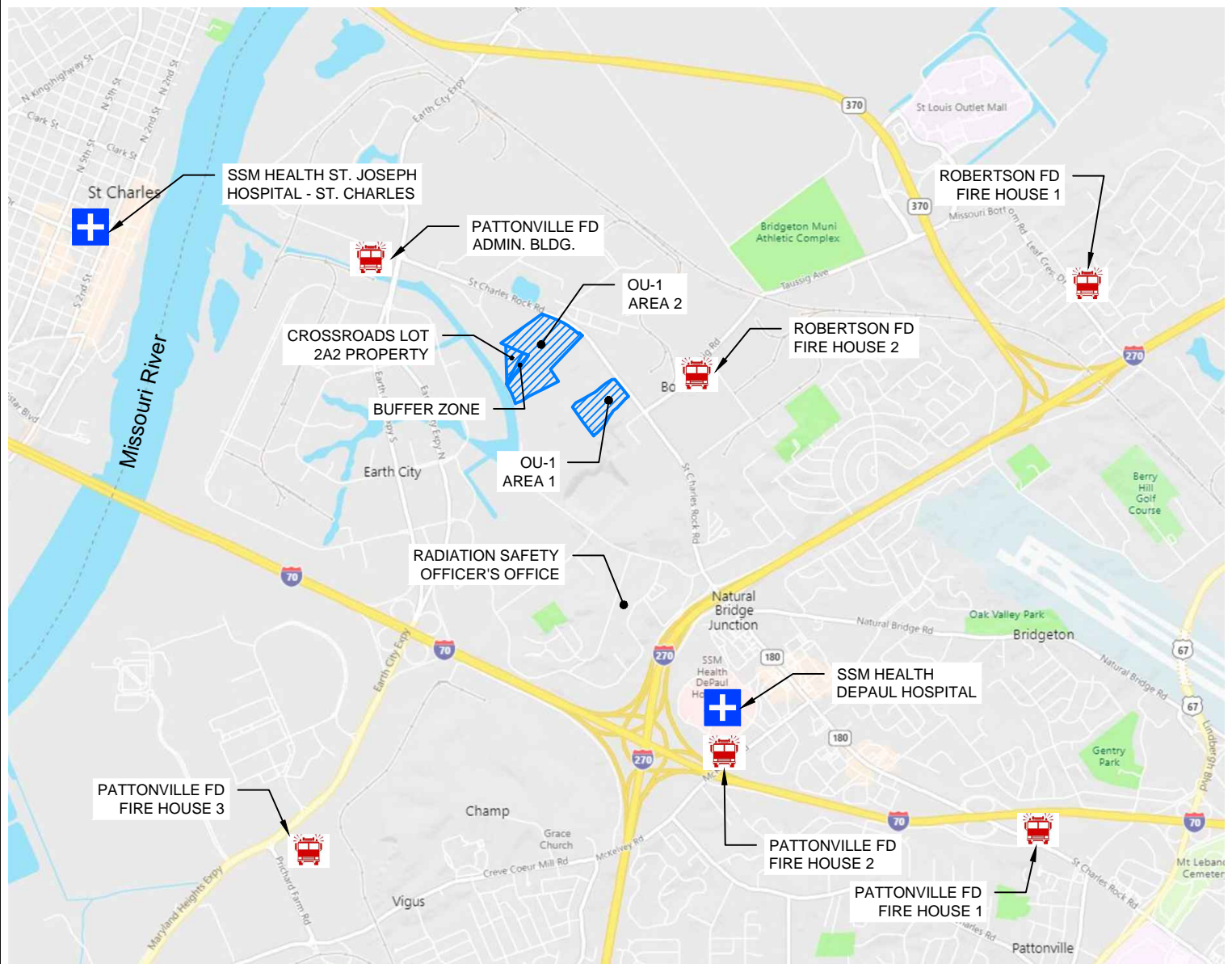
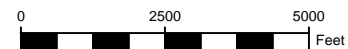


Image: © 2019 HERE, Open Street Map

**NOTE:**

- 1.) BASED ON FIGURES ORIGINALLY PREPARED BY CIVIL & ENVIRONMENTAL CONSULTANTS, INC. AND PRESENTED IN THE MARCH 28, 2019 INCIDENT MANAGEMENT PLAN



PREPARED BY



PROJECT

WEST LAKE LANDFILL  
SITE MANAGEMENT PLAN  
BRIDGETON, MISSOURI 63044

MAY 2019

DESIGNED BY: IN

APPROVED BY: ---

**FIGURE 1**

DRAWING TITLE

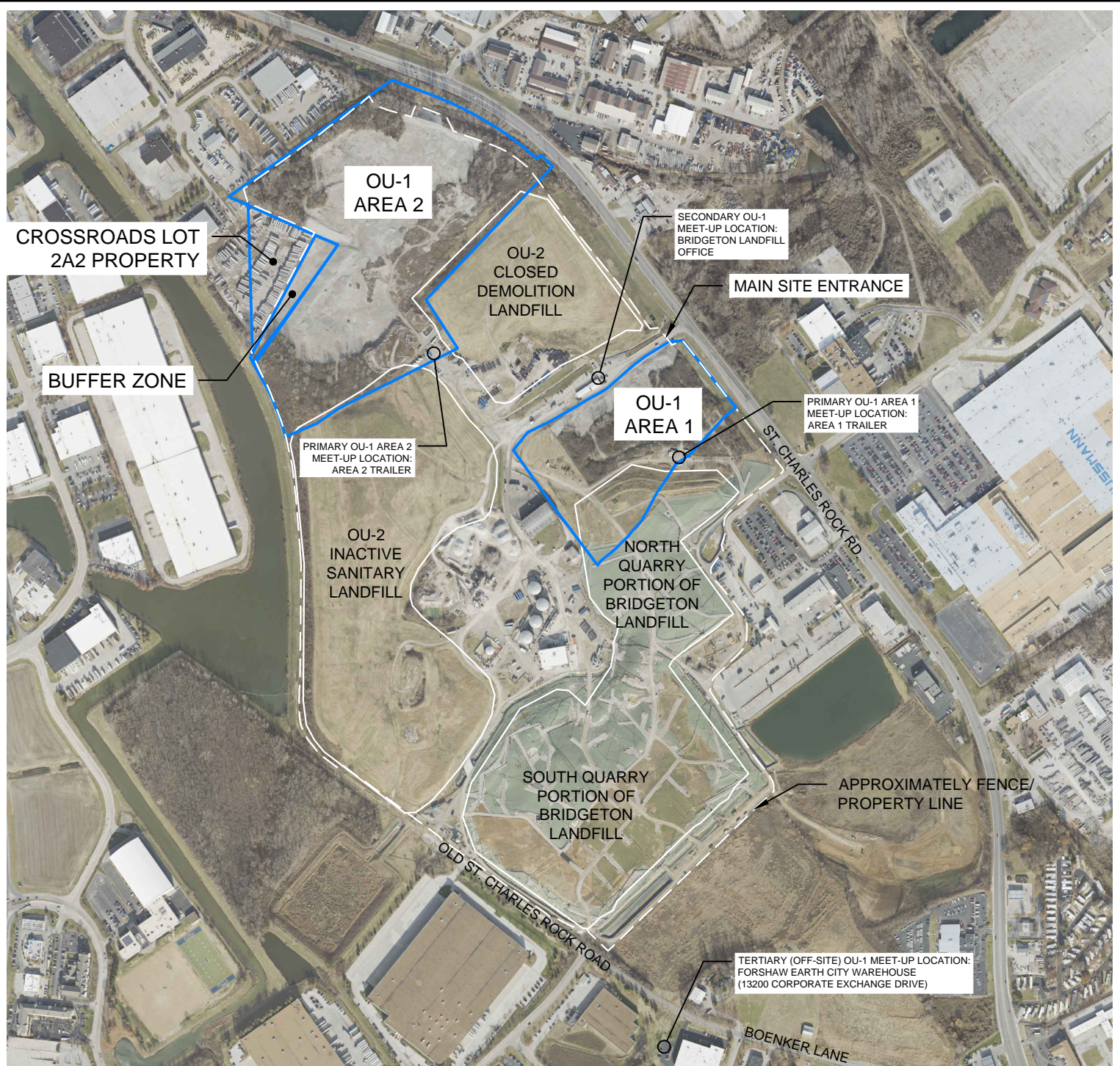
**SITE LOCATION**

3377 Hollenberg Dr, Bridgeton, MO 63044, Ph: 217-483-3118  
Missouri State Certificate Of Authority #: E-200912211

PROJECT NUMBER: BT-191.5

FILE PATH: D:\Dropbox (Feezor Engineering)\Bridgeton\BT-191 (RDWP Design And Management)\BT-191.5 - 02500 - Emergency Response Plan\Figures\BT-191.5-ERP Figures





#### NOTES:

- 1.) AERIAL IMAGERY PROVIDED BY COOPER AERIAL SURVEYS, INC. AND IS DATED DECEMBER 12, 2018
- 2.) BASED ON FIGURES ORIGINALLY PREPARED BY CIVIL & ENVIRONMENTAL CONSULTANTS, INC. AND PRESENTED IN THE MARCH 28, 2019 INCIDENT MANAGEMENT PLAN

PREPARED BY



PROJECT

WEST LAKE LANDFILL  
SITE MANAGEMENT PLAN  
BRIDGETON, MISSOURI 63044

MAY 2019

DESIGNED BY: IN

APPROVED BY: ---

**FIGURE 2**

DRAWING TITLE

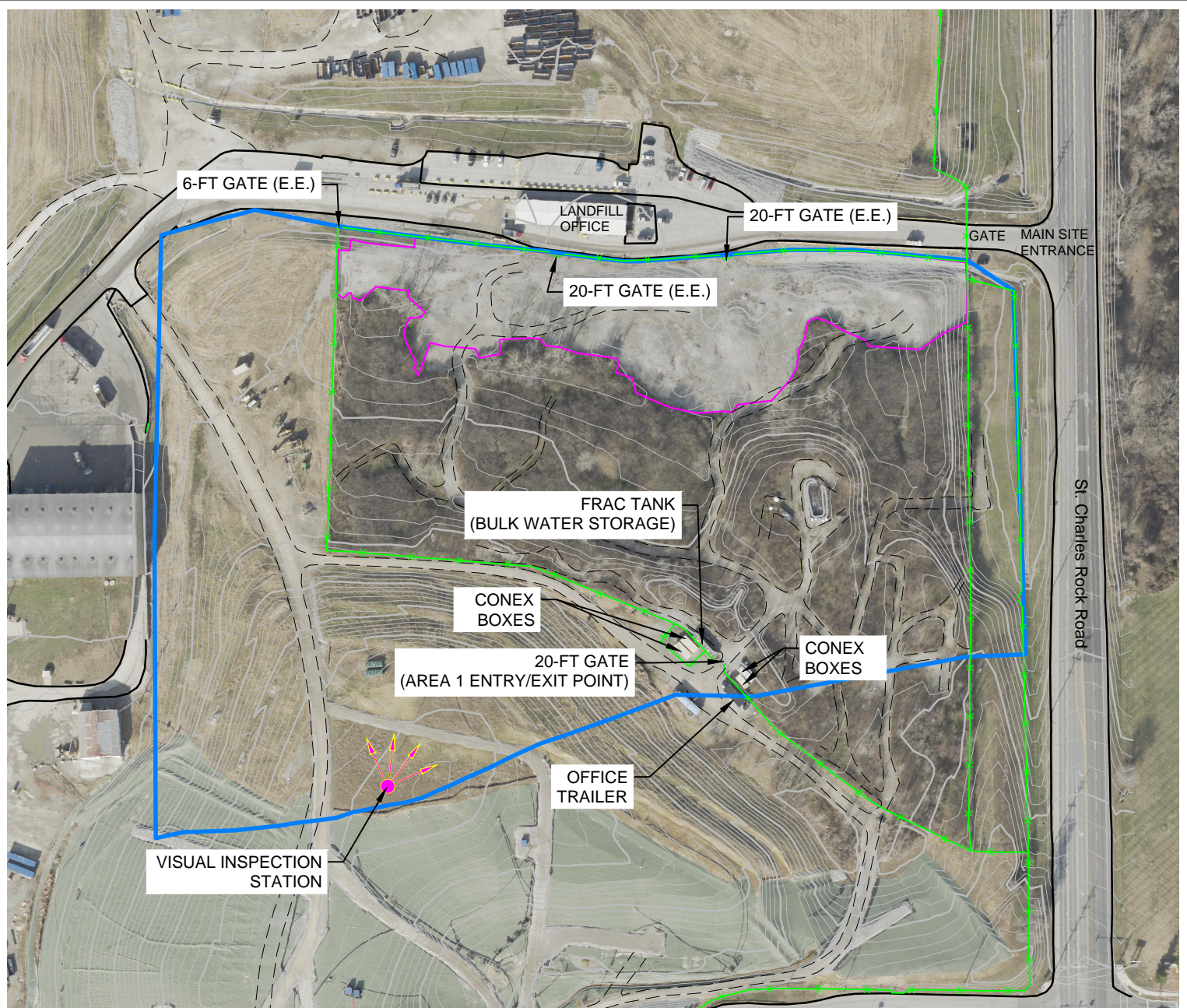
**SITE LAYOUT**

3377 Hollenberg Dr, Bridgeton, MO 63044, Ph: 217-483-3118  
Missouri State Certificate Of Authority #: E-200912211

PROJECT NUMBER: BT-191.5

FILE PATH: D:\Dropbox (Feezor Engineering)\Bridgeton\BT-191 (RDWP Design And Management)\BT-191.5 - 02500 - Emergency Response Plan\Figures\BT-191.5-ERP Figures





## LEGEND

	BASE TOPOGRAPHY (2' CONTOUR)
	BASE TOPOGRAPHY (10' CONTOUR)
	LIMIT OF NON-COMBUSTIBLE COVER
	OU-1 AREA 1
	FENCE
	GRAVEL ROAD
	PAVED ROAD



## NOTES:

- 1) AERIAL TOPOGRAPHY AND IMAGERY PROVIDED BY COOPER AERIAL SURVEYS, INC. AND IS DATED DECEMBER 12, 2018
- 2) E.E. - EMERGENCY EXIT
- 3) BASED ON FIGURES ORIGINALLY PREPARED BY CIVIL & ENVIRONMENTAL CONSULTANTS, INC. AND PRESENTED IN THE MARCH 28, 2019 INCIDENT MANAGEMENT PLAN

PREPARED BY



Engineering for a Better World

**FEEZOR**  
ENGINEERING, INC.

3377 Hollenberg Dr, Bridgeton, MO 63044, Ph: 217-483-3118  
Missouri State Certificate Of Authority #: E-200912211

PROJECT

WEST LAKE LANDFILL  
SITE MANAGEMENT PLAN  
BRIDGETON, MISSOURI 63044

MAY 2019

DESIGNED BY: IN

APPROVED BY: ---

**FIGURE 3**

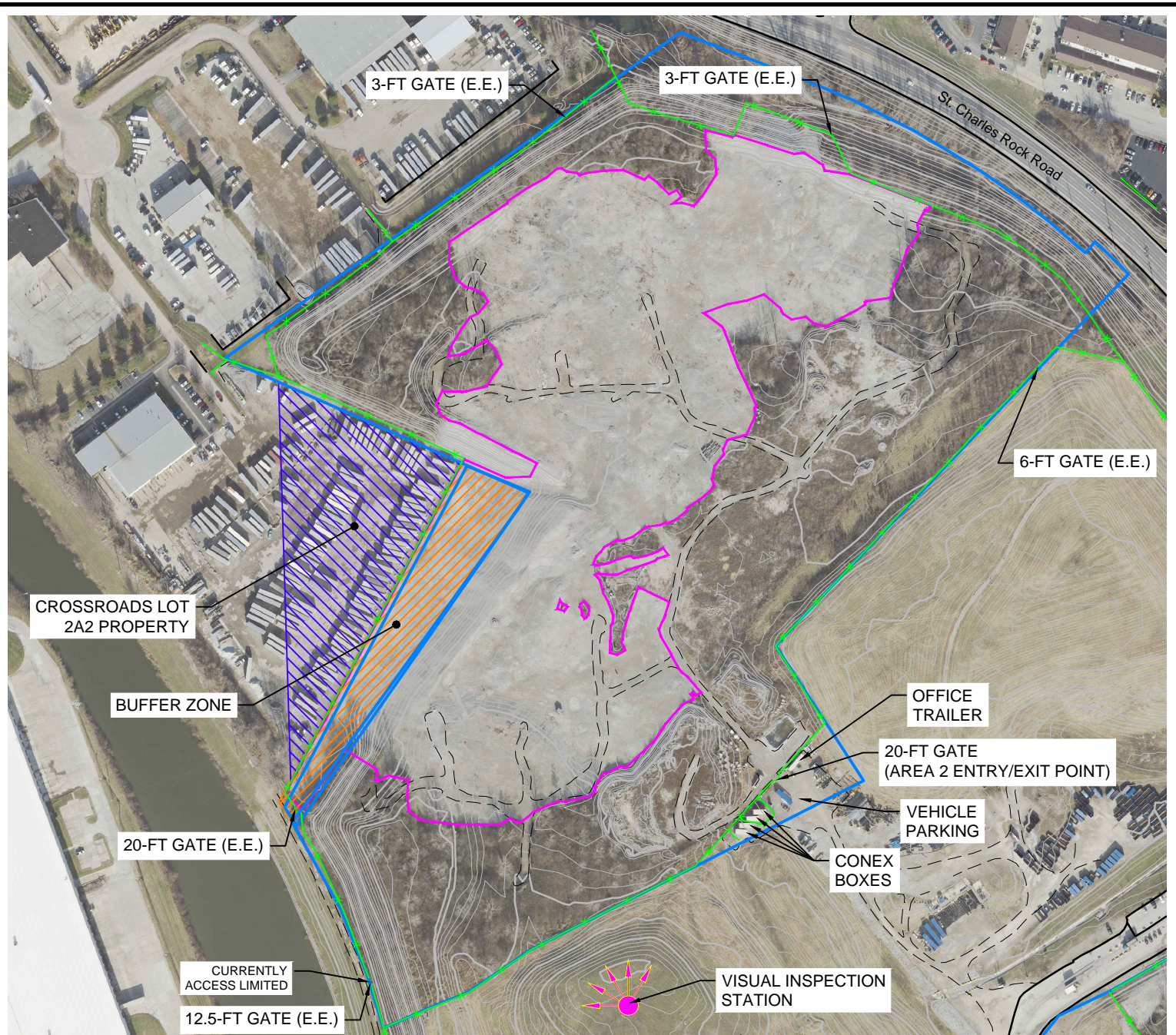
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**OU-1 AREA 1 FEATURES**

PROJECT NUMBER: BT-191.5

FILE PATH: D:\Dropbox (Feezor Engineering)\Bridgeton\BT-191 (RDWP Design And Management)\BT-191.5 - 02500 - Emergency Response Plan\Figures\BT-191.5-ERP Figures





## LEGEND

	BASE TOPOGRAPHY (2' CONTOUR)
	BASE TOPOGRAPHY (10' CONTOUR)
	LIMIT OF NON-COMBUSTIBLE COVER
	OU-1 AREA 2
	FENCE
	GRAVEL ROAD
	PAVED ROAD
	BUFFER ZONE
	CROSSROADS LOT 2A2 PROPERTY



## NOTES:

- 1) AERIAL TOPOGRAPHY AND IMAGERY PROVIDED BY COOPER AERIAL SURVEYS, INC. AND IS DATED DECEMBER 12, 2018
- 2) E.E. - EMERGENCY EXIT
- 3) BASED ON FIGURES ORIGINALLY PREPARED BY CIVIL & ENVIRONMENTAL CONSULTANTS, INC. AND PRESENTED IN THE MARCH 28, 2019 INCIDENT MANAGEMENT PLAN

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Engineering for a Better World

**FEEZOR**  
ENGINEERING, INC.

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Missouri State Certificate Of Authority #: E-200912211

PROJECT

WEST LAKE LANDFILL  
SITE MANAGEMENT PLAN  
BRIDGETON, MISSOURI 63044

MAY 2019

DESIGNED BY: IN

APPROVED BY: ---

**FIGURE 4**

DRAWING TITLE

**OU-1 AREA 2 FEATURES**

PROJECT NUMBER: BT-191.5

FILE PATH: D:\Dropbox (Feezor Engineering)\Bridgeton\BT-191 (RDWP Design And Management)\BT-191.5 - 02500 - Emergency Response Plan\Figures\BT-191.5-ERP Figures





LEGEND

- NATIVE ROADS - TRACTOR TRAILER AND FIRE TRUCK PASSABLE
- NATIVE ROADS - FIRE TRUCK PASSABLE
- FENCE
- FIRE HYDRANT

NOTES:

- AERIAL IMAGERY PROVIDED BY COOPER AERIAL SURVEYS, INC. AND IS DATED DECEMBER 12, 2018
- BASED ON FIGURES ORIGINALLY PREPARED BY CIVIL & ENVIRONMENTAL CONSULTANTS, INC. AND PRESENTED IN THE MARCH 28, 2019 INCIDENT MANAGEMENT PLAN

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3377 Hollenberg Dr, Bridgeton, MO 63044, Ph: 217-483-3118  
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PROJECT

WEST LAKE LANDFILL  
SITE MANAGEMENT PLAN  
BRIDGETON, MISSOURI 63044

MAY 2019

DESIGNED BY: IN

APPROVED BY: ---

FIGURE 5

DRAWING TITLE

EMERGENCY RESPONSE INFRASTRUCTURE  
AND FEATURES

PROJECT NUMBER: BT-191.5

FILE PATH: D:\Dropbox (Feezor Engineering)\Bridgeton\BT-191 (RDWP Design And Management)\BT-191.5 - 02500 - Emergency Response Plan\Figures\BT-191.5-ERP Figures

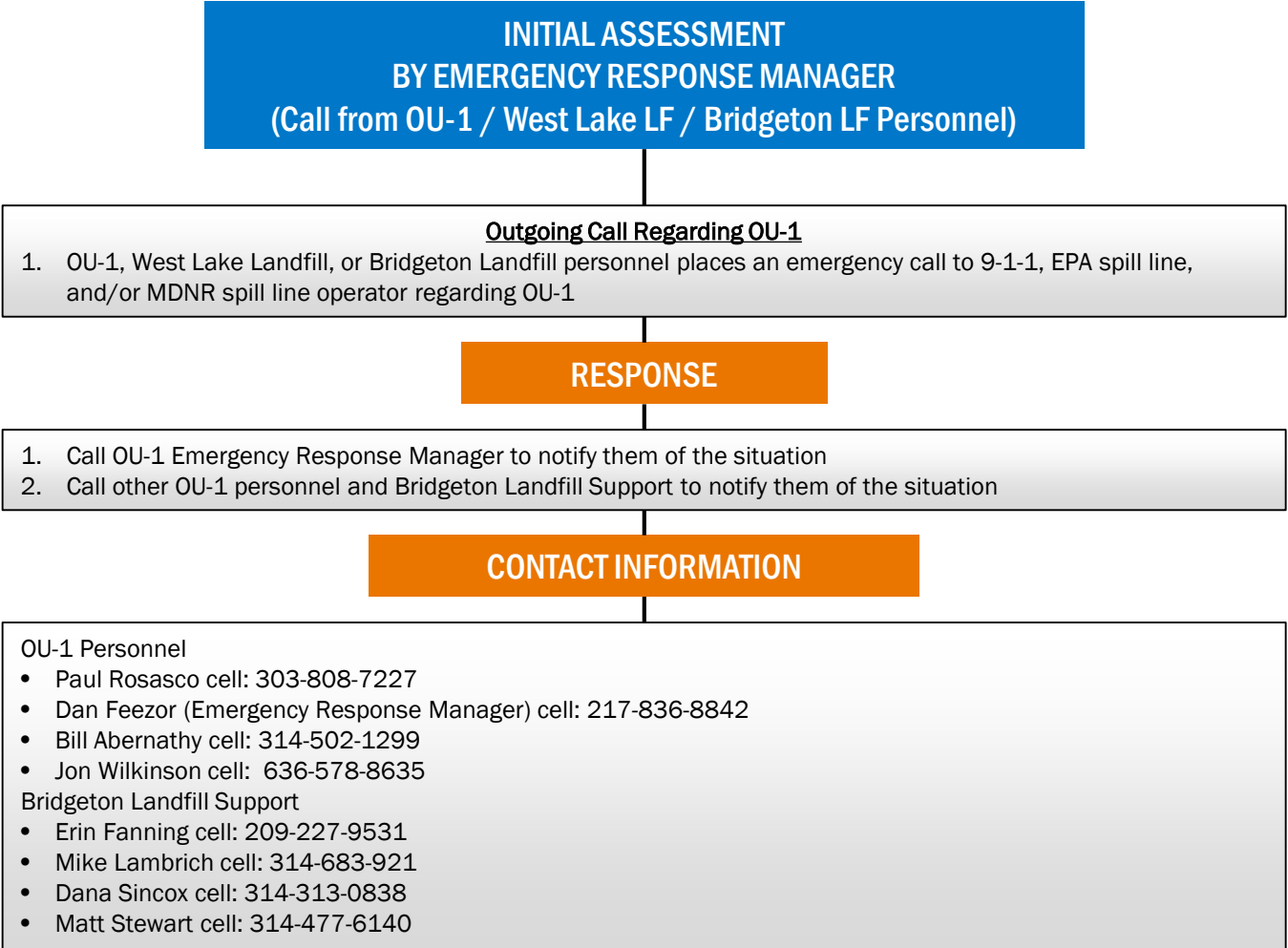
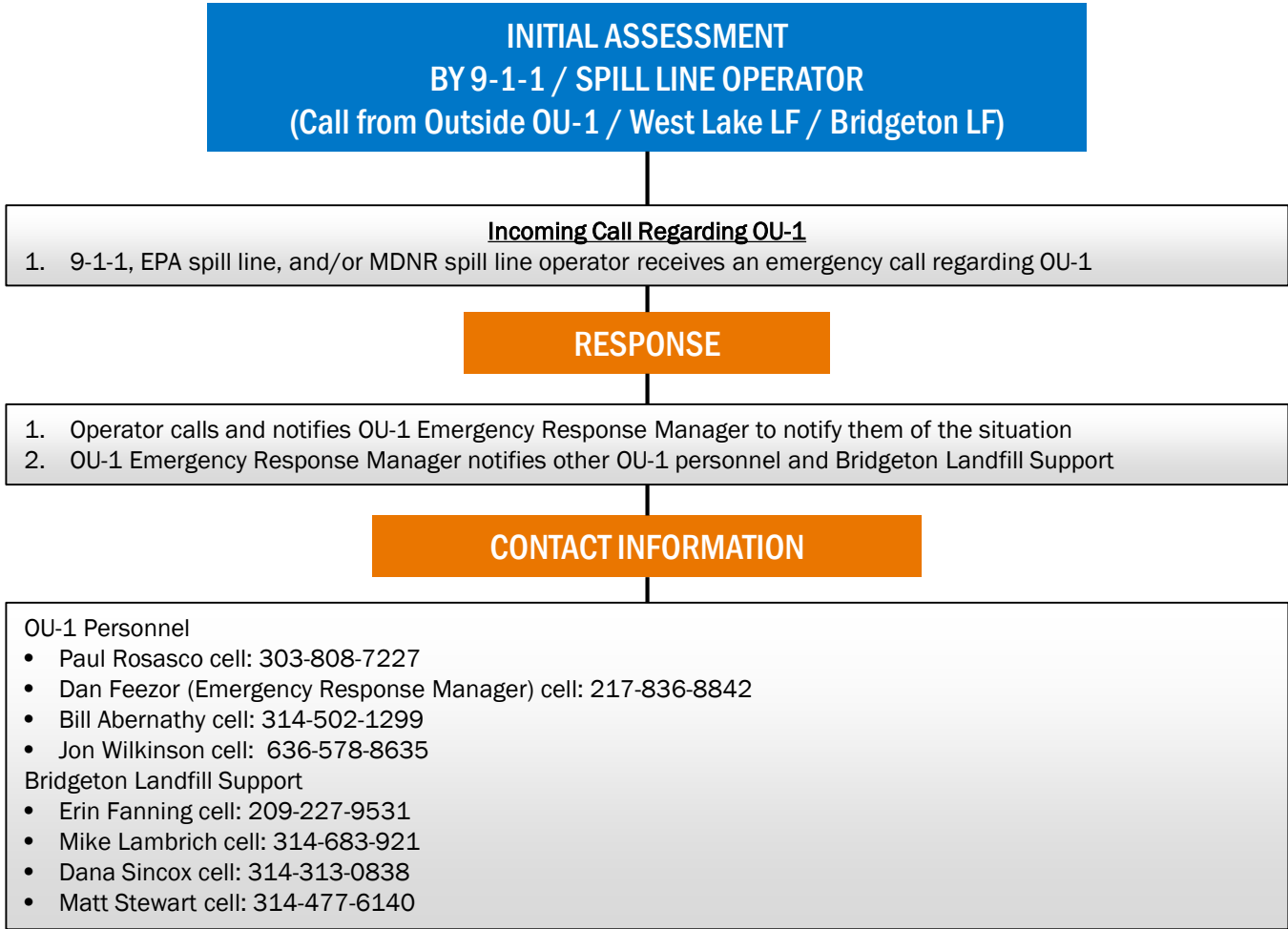


## **Appendix A - Emergency Response Strategies**

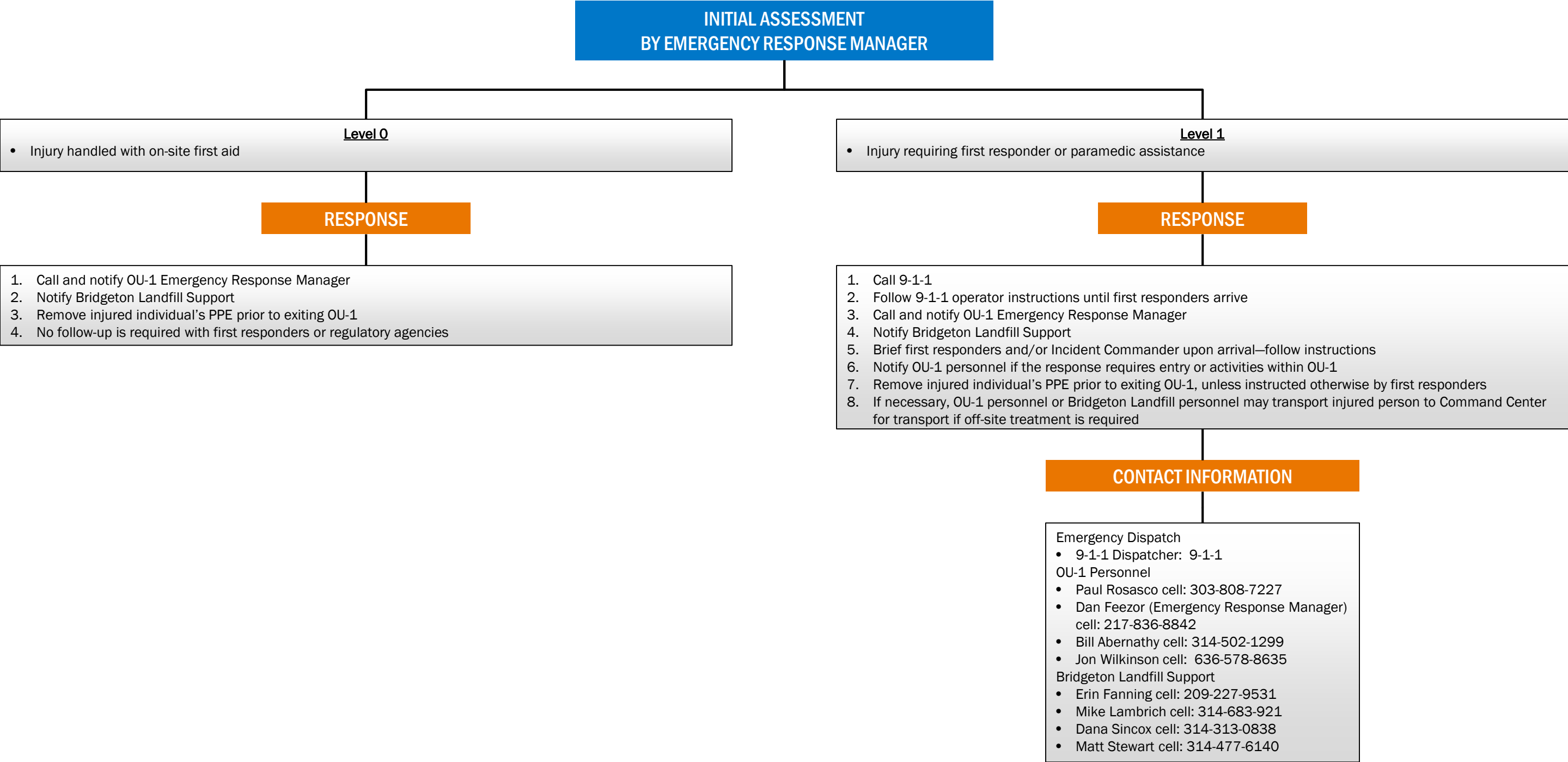
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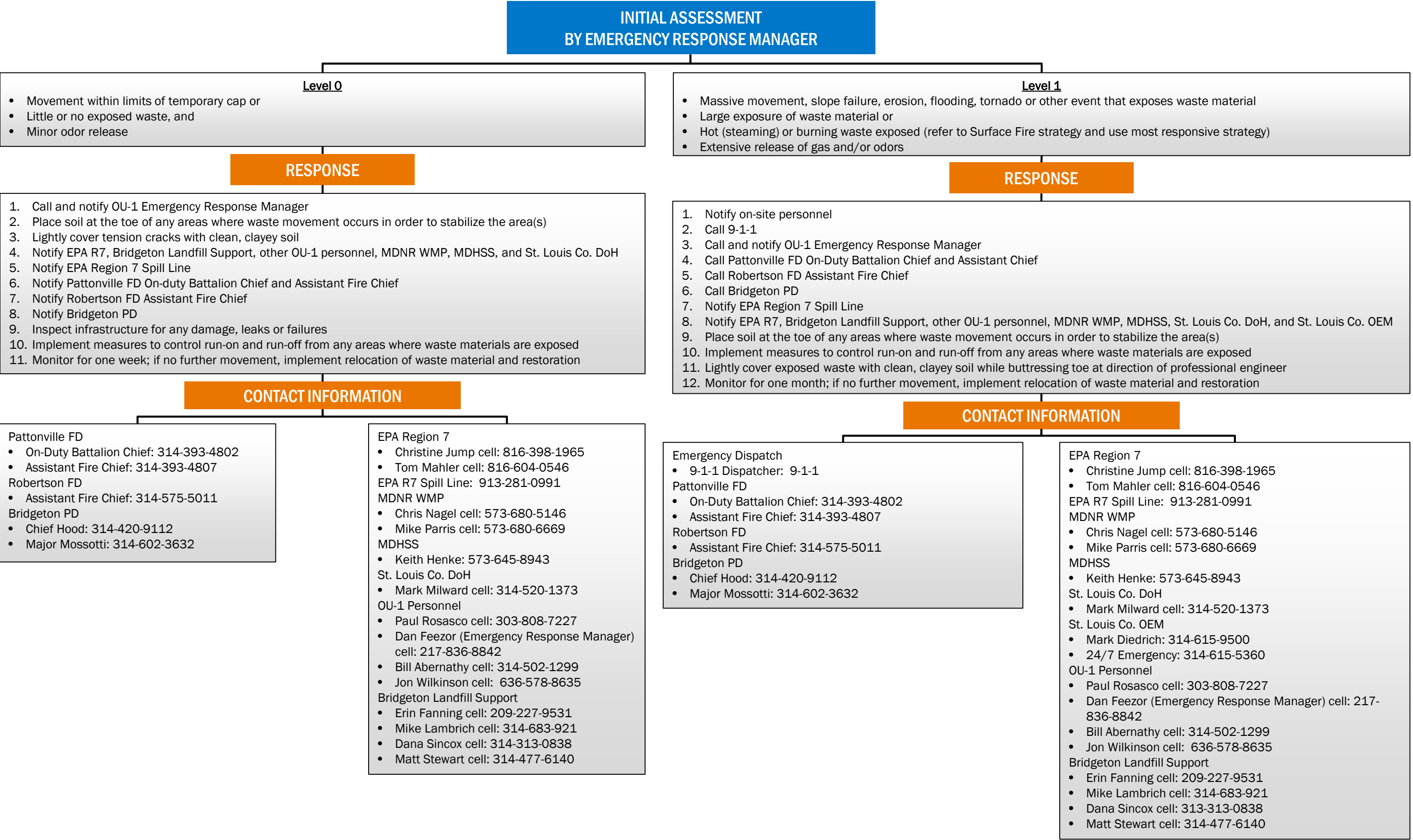
EMERGENCY – WEST LAKE LANDFILL SUPERFUND SITE OU-1 – CALL TO 9-1-1 / EPA SPILL LINE / MNDR SPILL LINE



EMERGENCY – WEST LAKE LANDFILL SUPERFUND SITE OU-1 - PERSONAL INJURY / MAN DOWN / PERSONNEL CONTAMINATION



EMERGENCY- WEST LAKE LANDFILL SUPERFUND SITE OU-1 - SUDDEN WASTE MOVEMENT / EXPOSED WASTE



EMERGENCY – WEST LAKE LANDFILL SUPERFUND SITE OU-1 - SURFACE FIRE

INITIAL ASSESSMENT  
BY EMERGENCY RESPONSE MANAGER

Level 0

- Small affected area, or
- Minor smoke plume, and
- Equipment and personnel on-site sufficient to resolve incident.

RESPONSE

1. Notify on-site personnel
2. Call and notify OU-1 Emergency Response Manager
3. Notify EPA R7, Bridgeton Landfill Support, other OU-1 personnel, MDNR WMP, MDHSS, and St. Louis Co. DoH
4. Notify Pattonville FD On-Duty Battalion Chief and Assistant Fire Chief
5. Notify Robertson FD Assistant Fire Chief
6. Notify Bridgeton PD
7. Notify EPA R7 Spill Line
8. Coordinate extinguishment (with extinguishers or water truck spray)
9. Implement measures to control run-on and run-off from any areas where water is applied
10. Monitor continuously for one hour to ensure fire has been extinguished
11. Assess potential damage to systems and make repairs

CONTACT INFORMATION

Pattonville FD

- On-Duty Battalion Chief: 314-393-4802
- Assistant Chief: 314-393-4807

Robertson FD

- Assistant Fire Chief: 314-575-5011

Bridgeton PD

- Chief Hood: 314-420-9112
- Major Mossotti: 314-602-3632

EPA Region 7

- Christine Jump cell: 816-398-1965
- Tom Mahler cell: 816-604-0546

EPA R7 Spill Line: 913-281-0991

MDNR WMP

- Chris Nagel cell: 573-680-5146
- Mike Parris cell: 573-680-6669

MDHSS

- Keith Henke: 573-645-8943

St. Louis Co. DoH

- Mark Milward cell: 314-520-1373

OU-1 Personnel

- Paul Rosasco cell: 303-808-7227
- Dan Feezor (Emergency Response Manager) cell: 217-836-8842
- Bill Abernathy cell: 314-502-1299
- Jon Wilkinson cell: 636-578-8635

Bridgeton Landfill Support

- Erin Fanning cell: 209-227-9531
- Mike Lambrich cell: 314-683-921
- Dana Sincox cell: 314-313-0838
- Matt Stewart cell: 314-477-6140

Level 1

- After normal business hours, or
- Insufficient on-site resources, or
- Flame/smoke visible from off-site, or
- Large affected area

RESPONSE

1. Notify on-site personnel
2. Call 9-1-1
3. Call and notify OU-1 Emergency Response Manager
4. Call Pattonville FD On-Duty Battalion Chief and Assistant Fire Chief
5. Call Robertson FD Assistant Fire Chief
6. Call Bridgeton PD
7. Call EPA R7 Spill Line
8. Notify EPA R7, Bridgeton Landfill Support, other OU-1 personnel, MDNR WMP, MDHSS, St. Louis Co. DoH, and St. Louis Co. OEM
9. Suspend impacted, non-critical operations (unless such operation minimizes incident)
10. Coordinate extinguishment with Incident Commander
11. Implement measures to control run-on and run-off from any areas where water is applied
12. Monitor continuously for 48 hours to assure extinguishment
13. Assess potential damage to systems and make repairs
14. Resume regular operations with consent of Incident Commander

CONTACT INFORMATION

Emergency Dispatch

- 9-1-1 Dispatcher: 9-1-1

Pattonville FD

- On-Duty Battalion Chief: 314-393-4802
- Assistant Fire Chief: 314-393-4807

Robertson FD

- Assistant Fire Chief: 314-575-5011

Bridgeton PD

- Chief Hood: 314-420-9112
- Major Mossotti: 314-602-3632

EPA Region 7

- Christine Jump cell: 816-398-1965
- Tom Mahler cell: 816-604-0546

EPA R7 Spill Line: 913-281-0991

MDNR WMP

- Chris Nagel cell: 573-680-5146
- Mike Parris cell: 573-680-6669

MDHSS

- Keith Henke: 573-645-8943

St. Louis Co. DoH

- Mark Milward cell: 314-520-1373

St. Louis Co. OEM

- Mark Diedrich: 314-615-9500
- 24/7 Emergency: 314-615-5360

OU-1 Personnel

- Paul Rosasco cell: 303-808-7227
- Dan Feezor (Emergency Response Manager) cell: 217-836-8842
- Bill Abernathy cell: 314-502-1299
- Jon Wilkinson cell: 636-578-8635

Bridgeton Landfill Support

- Erin Fanning cell: 209-227-9531
- Mike Lambrich cell: 314-683-921
- Dana Sincox cell: 314-313-0838
- Matt Stewart cell: 314-477-6140

## **Appendix B - Emergency Assessment and Response Action Checklist**

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**West Lake Landfill Superfund Site OU-1  
Emergency Response Plan (ERP)**

**EMERGENCY ASSESSMENT AND RESPONSE ACTION CHECKLIST  
FOR EMERGENCY RESPONSE MANAGER**

1. Make initial determination as to whether situation rises to the level of an emergency.
2. Classify category and severity (Level 0 or 1) of emergency.
3. Initiate appropriate response strategy (ERP Appendix A) and follow listed response actions in order given.
4. For emergency notification actions, collect the following information and communicate it to notified parties:
  - Location of emergency in OU-1: Area 1, Area 2, or Buffer Zone and general direction (e.g., eastern side of Area 1)
  - OU-1 site entrance closest to emergency
  - Emergency category and severity (Level 0 or 1)
5. Account for site personnel.
6. Ensure that appropriate OU-1 site entrance and emergency exits are unlocked and open.
7. Determine if a hazardous substance or waste material release is occurring / has occurred, and takes steps to contain, if needed.
8. Resume normal operation with consent of Incident Commander.

**EMERGENCY DETAILS**

Date and Time of Incident: \_\_\_\_\_

Emergency Response Coordinator: \_\_\_\_\_

Description of Emergency: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date and Time Normal Operation Resumed: \_\_\_\_\_

\_\_\_\_\_