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RECIPIENT GROUP: US Environmental Protection Agency

SPECIFICATION SECTION AND PARAGRAPH NO. OF REQUIREMENT:

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THIS FORM MUST REMAIN WITH THE ASSOCIATED DOCUMENT
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Irvin Peeters Staging facility – Lower Fox River Remediation Project
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<th>Description</th>
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<tr>
<td>CERCLA</td>
<td>Comprehensive Environmental Response, Compensation and Liability Act</td>
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<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
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<tr>
<td>EHS</td>
<td>Environmental Health and Safety</td>
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<td>EPA</td>
<td>U.S. Environmental Protection Agency</td>
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<td>JFB</td>
<td>J.F. Brennan Co., Inc.</td>
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<tr>
<td>LLC</td>
<td>Limited Liability Corporation</td>
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<td>OU2-5</td>
<td>Operable Units 2-5</td>
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<tr>
<td>P.E.</td>
<td>Professional Engineer</td>
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<td>POL</td>
<td>petroleum, oil and lubricants</td>
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<td>SDI</td>
<td>Stuyvesant Dredging Inc.</td>
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<td>SPCC</td>
<td>Spill Prevention, Control, and Countermeasures</td>
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<td>TTEC</td>
<td>Tetra Tech EC, Inc.</td>
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*Irvin Peeters Staging facility – Lower Fox River Remediation Project*
*Spill Prevention, Control, and Countermeasures Plan*
1.0 INTRODUCTION
This Spill Prevention, Control, and Countermeasures (SPCC) Plan was developed for the Lower Fox River Operable Units 2-5 (OU2-5) Irvin Peeters staging facility located in De Pere, Wisconsin. The purpose of the Plan is to describe the measures implemented by J.F. Brennan Co., Inc. (JFB) to prevent oil (includes petroleum and non petroleum products) discharges from occurring and prepare JFB to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge from the site.

This SPCC Plan has been prepared and implemented in accordance with the substantive requirements of 40 Code of Federal Regulations [CFR] Part 112 (Oil Pollution Prevention). The SPCC regulation requires that a construction site storing oil in quantities above a threshold volume, and located such that it could potentially impact navigable waters of the United States, prepare and implement a SPCC Plan.

In addition to fulfilling requirements of 40 CFR 112, this SPCC Plan is used as a reference for oil storage information, as a tool to communicate practices on preventing and responding to discharges with JFB employees and subcontractors, as a guide on facility inspections, and as a resource during emergency response.

2.0 MANAGEMENT APPROVAL
JFB is committed to preventing discharges of oil to navigable waters and the environment through the implementation of this SPCC Plan. This SPCC Plan has the full approval of JFB management. JFB's management has committed the necessary resources to implement the measures described in this Plan.

Mike Binsfeld, JFB Project Engineer is the designated person accountable for oil spill prevention at this facility and has the authority to commit the necessary resources to implement the Plan as described.

Authorized Facility Representative: Mike Binsfeld
Signature: [Signature]
Title: JFB Project Engineer
Date: 9/28/01

3.0 PROFESSIONAL ENGINEER CERTIFICATION
The undersigned Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the CFR and has visited and examined the site, or has supervised examination of the facility by the appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR Part 112; that procedures for required inspections and testing have been established; and that this Plan is adequate for the facility.
This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR Part 112.

Name of Professional Engineer: Richard Feeney

Registration Number: E-39792
Issuing State: WI

Signature: Date: Seal

4.0 PLAN REVIEW
In accordance with 40 CFR 112.5, JFB periodically reviews and evaluates this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge. Standard practice for JFB is to review and implement changes to the SPCC Plan at least once every 5 years. However, the property is leased for a four year term only, therefore, the SPCC plan will not be modified during the anticipated duration of the site needs.

Scheduled 4-year reviews and Plan amendment are recorded if necessary in Table 1. This log must be completed even if no amendment is made to the Plan.

Table 1. SPCC Plan Record of Review and Changes

<table>
<thead>
<tr>
<th>Date</th>
<th>Authorized Person</th>
<th>Review Type</th>
<th>P.E. Certification</th>
<th>Summary of Changes</th>
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5.0 LOCATION OF SPCC PLAN
In accordance with 40 CFR 112.3(e) a complete copy of this SPCC Plan is maintained at the Lower Fox River OU2-5 Irvin Peeters staging facility located at Brown County Land Parcel ED-50-1 (near 2646 Old Plank Road), De Pere, Wisconsin. The copy can be found in the Eastern Land Parcel's control connex.

6.0 GENERAL FACILITY INFORMATION
6.1 Company Information
Facility Name: Lower Fox River OU2-5 Irvin Peeters Staging Facility
Property Owner: Irvin and Viola Peeters

Facility Operators: J.F. Brennan Co., Inc. and Tetra Tech EC on behalf of the Lower Fox River Remediation LLC

Address: 1611 State Street
City/State/Zip: Green Bay, Wisconsin / 54304
Phone: 920-445-0709
Contact: Greg Smith, Project Manager

6.2 Contact Information
The designated person accountable for overall oil spill prevention and response at the facility, also referred to as the site’s Response Coordinator, is the JFB Project Manager, Greg Smith. Table 2 provides 24-hour contact information for key personnel at the facility, fuel and used oil recycling vendors servicing the facility.

Table 2. Facility Contact Information

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Telephone</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greg Smith</td>
<td>JF Brennan Project Manager</td>
<td>608-792-0465</td>
<td>1611 State St., Green Bay, WI</td>
</tr>
<tr>
<td>Kevin Zenke</td>
<td>JF Brennan Operation Manager</td>
<td>608-792-1140</td>
<td>1611 State St., Green Bay, WI</td>
</tr>
<tr>
<td>Loren Anderson</td>
<td>JF Brennan Safety Manager</td>
<td>608-792-4083</td>
<td>1611 State St., Green Bay, WI</td>
</tr>
<tr>
<td>Ray Mangrum</td>
<td>Tetra Tech Project Manager</td>
<td>920-445-0721</td>
<td>1611 State St., Green Bay, WI</td>
</tr>
<tr>
<td>Bart Heimstra</td>
<td>Stuyvesant Dredging Inc.</td>
<td>920-445-0749</td>
<td>1611 State St., Green Bay, WI</td>
</tr>
<tr>
<td>Steve Vandyacht</td>
<td>New Energy LLC</td>
<td>920-735-8246</td>
<td>558 Carter Ct. Kimberly, WI</td>
</tr>
<tr>
<td>Jeff Lawson</td>
<td>Fox River Remediation LLC Representative</td>
<td>508-751-9502</td>
<td>20 Trafalgar Square, Nashua, NH</td>
</tr>
</tbody>
</table>

6.3 Site Layout
Attachment A of this Plan contains a facility layout that identifies the locations of oil storage and the direction of storm water flow at the site. Noted on the figure are the contents of all oil storage containers greater than 55 gallons in capacity.

6.4 Facility Location and Operations
JFB operates the Lower Fox River OU2-5 Irvin Peeters staging facility under a land lease agreement with Irvin and Viola Peeters. The facility is located in the city of De Pere within Brown County, Wisconsin. The facility will aid in the storage of material to cover polychlorinated biphenyl (PCB) contaminated sediment in the Lower Fox River each year as required by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Amended Record of Decision for the Lower Fox River OU2-5 Remediation.

The site encompasses approximately 17 acres of area for proposed use as a cap/cover material conveyance and staging site. The property was chosen because it allows for direct access to the Fox River, and will aid in several functions necessary to complete the
Remediation Project. The property shoreline runs 385 feet along the east bank of the river. It contains a steep, vegetated slope leading up to the staging area. The site is divided into two parcels separated by Old Plank Road. The eastern portion of the lot, located directly off Highway 57, will be used for sand and rock storage along with a slurry tank system that will be the starting point for the capping material conveyance. The riverfront portion of the land will contain booster pump stations and pipe storage areas.

6.5 Oil Storage and Handling

Oil is stored and handled at the site by JF Brennan, New Energy LLC, and Safety Kleen. Movable above ground storage tanks for fuel are installed, serviced and maintained by New Energy LLC, a Wisconsin Certified Tank Installer. Used oil filters generated by JFB are collected and recycled offsite by Safety Kleen. The oil storage inventory for the facility is summarized in Table 3.

Table 3. Fuel and Oil Storage Inventory

<table>
<thead>
<tr>
<th>Number/Material</th>
<th>Intended Use</th>
<th>Maximum Amount Stored Onsite (Gallons)</th>
<th>Staging/Storage Location</th>
<th>Location and Distance to Runoff Areas</th>
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<tbody>
<tr>
<td>Outdoor Oil Storage</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Diesel (Movable Aboveground Storage Tank)</td>
<td>JFB Equipment Fueling</td>
<td>1,000</td>
<td>Eastern Land Parcel (Tank A – as shown in Appendices)</td>
<td>135 feet from drainage swale for on-site detention pond</td>
</tr>
<tr>
<td>Diesel (Movable Aboveground Storage Tank)</td>
<td>JFB Equipment Fueling</td>
<td>1,000</td>
<td>Eastern Land Parcel (Tank B – as shown in Appendices)</td>
<td>135 feet from drainage swale for on-site detention pond</td>
</tr>
<tr>
<td>Diesel (Movable Aboveground Storage Tank)</td>
<td>JFB Equipment Fueling</td>
<td>1,000</td>
<td>Western Land Parcel (Tank C – as shown in Appendices)</td>
<td>150' From River Bank</td>
</tr>
<tr>
<td>Gasoline (Movable Aboveground Storage Tank)</td>
<td>JFB Equipment Fueling</td>
<td>500</td>
<td>Western Land Parcel (Tank D – as shown in Appendices)</td>
<td>200' From River Bank - Portable</td>
</tr>
</tbody>
</table>

6.5.1 Transfer Activities

Above ground storage tanks are used by JFB to fuel construction equipment and vehicles. New Energy LLC delivers fuel oil to the site and fills the tanks as needed, determined by equipment usage. Equipment and vehicles are filled at the tank locations shown on the site diagram except where tank trucks are used to bring fuel directly to the equipment.
6.6 Proximity to Navigable Waters

The site is located within the Lower Fox River Basin which encompasses 638 square miles in northeastern Wisconsin. The closest outdoor oil storage container greater than 55 gallons is situated more than 150 feet from the Lower Fox River. Runoff from the western land parcel is designed to drain to the river via the navigable waterway running through the center of that land parcel. In the event of an uncontrolled discharge from an equipment piece or fuel drum on the eastern land parcel, fuel oil would follow natural topography of the site, flowing towards the smaller navigable waterway to the west of the fuel barrels and eventually into the Lower Fox River. The river flows north and discharges into Green Bay.

Oil transfer activities are expected to occur at this location throughout the duration of the remediation project. The applicable equipment includes all powered machinery, hydraulic pistons and fitting, and non-powered friction devices. Oil transfer and maintenance procedures are defined by the application to that particular piece of equipment. For example, draining used oil from these machines, applying grease to necessary grommets, and lubrication of all moving parts. The operation is generally completed by two Brennan mechanics or the operator in charge of that specific piece of equipment. As the necessary work begins, any waste fluid generated is drained into pans and poured into 5 gallon containers. These containers are sealed and removed to a designated area and removed from the site by Safety Kleen. The fluid filters are then removed with any release being captured by the drain pans, and properly discarded in plastic lined containers located near the waste oil tanks. Once the filter is replaced the new fluid is pumped directly from its shipping container into the required tank. All equipment is then wiped down for any possible drips and rags are properly disposed of in the plastic lined containers. When adding lubricants to machinery a mechanized pump is used to apply directly into grease zerks. The zerk fittings are completely enclosed and the lubricants are never exposed outside a sealed atmosphere. A certified collection service removes waste oil from the site when necessary.

6.7 Conformance with Applicable State and Local Requirements

As required by state regulation, the above ground storage tanks containing fuel (greater than 110 gallons) meet requirements for temporary (less than 24 months) movable above ground storage tanks at construction sites which include environmental remediation sites (Wisconsin, 1996). Additionally these tanks meet all local fire code requirements. Discharge notifications are made in compliance with local, state, and federal requirements.

7.0 SPILL RESPONSE AND REPORTING

JFB has acquired the assistance of Veolia Emergency Response Services in the event a spill has taken place. This service should be enlisted under special circumstances where JFB personnel are not able to maintain control of an environmental spill.
7.1 Discharge Discovery and Reporting
Several individuals and organizations must be contacted in the event of an oil discharge. All discharges shall be reported to the JFB Project Manager, who is responsible for ensuring that all required discharge notifications have been made. In his absence this responsibility is assumed by the JFB Operations Manager, or in his absence the JFB Health and Safety Manager. All discharges will be reported as described in the Project Contingency Plan (Attachment B).

7.2 Verbal Notification Requirements (Local, State, and Federal)
For any discharge that reaches navigable waters, or threatens to reach navigable waters, immediate notification must be made to the National Response Center Hotline (800-424-8802) and to the U.S. Environmental Protection Agency (EPA), Region V. In the event of a discharge that does not present an emergency situation, verbal notification must be made in accordance with the Project Contingency Plan (Attachment B). In either case the A/OT will be informed of the discharge.

7.3 Written Notification Requirements (State and Federal)
A written notification will be made to EPA for any single discharge of oil to a navigable water or adjoining shoreline waterway of more than 1,000 gallons, or for two discharges of 1 barrel (42 gallons) of oil to a waterway in any 12-month period. This written notification must be made within 60 days of the qualifying discharge, and a copy will be sent to the Wisconsin Department of Natural Resources, which is the state agency in charge of oil pollution control activities. This reporting requirement is separate and in addition to reporting under 40 CFR Part 112. Additionally, the A/OT will be informed.

7.4 Spill Response Materials
Boom, sorbent, and other spill response materials are stored on site adjacent to outdoor fuel storage tank locations and are accessible to facility personnel. Equipment inventory is checked monthly by operations personnel to ensure that used material is replenished.

7.5 Spill Mitigation Procedures
This section summarizes the actions that must be taken in the event of a discharge, including responsibilities of facility personnel and procedures to follow during a discharge event.

In the event of a discharge, JFB operations personnel shall be responsible for the following actions:

7.5.1 Shut off Ignition Sources
Site personnel must shut off all ignition sources, including motors, electrical circuits, and open flames.

7.5.2 Stop Oil Flow
Site personnel should determine the source of the discharge, and if safe to do so, immediately shut off the source of the discharge.
7.5.3 Stop the Spread of Oil

If safe to do so, facility personnel must use resources available at the facility to stop the spilled material from spreading. Measures that may be implemented, depending on the location and size of the discharge, include placing sorbent material or other barriers in the path of the discharge (e.g., soil berm, sand bags or catch basin covers). Should a discharge reach the Lower Fox River, only physical response and countermeasures should be implemented, such as the deployment of booms or use of sorbent pads. Sorbent material and/or boom(s) should be placed immediately downstream of the discharge to recover any sheen from the water. Facility personnel should remove oiled vegetation and debris from the river bank and place them in bags for later disposal. Additional cleanup to remove oil trapped in the river bank may be required. At no time shall any surfactants, dispersants, or other chemical be used to remove oil from the river.

7.5.4 Gather Spill Information

The JFB Project Manager will ensure that notifications have been made to the appropriate authorities. The JFB Operations Manager will gather the following information:

- Name of person reporting discharge
- Location of spill
- Date and time of spill discovery
- Material spilled
- Total volume spilled and total volume reaching the river or adjoining river banks
- Weather conditions
- Source of spill
- Actions being taken to sop, remove, and mitigate the effects of the discharge
- Need for evacuation
- Spill impacts (injuries, damage, environmental media contaminated)
- Name of agencies and organization that have been contacted

7.6 Disposal Plan

JF Brennan personnel will respond to spills and containerize any recovered product, contaminated soil, contaminated materials and equipment, decontamination solutions, sorbents, and spent chemical collected during response to a discharge event. Containerized material will be removed from site by a qualified individual and disposed of properly.

Any recovered product that can be recycled will be separated and recycled at a designated recovery facility. Any recovered product not deemed suitable for recycling will be disposed of with other oil cleanup wastes. Disposal will occur at Lower Fox River Remediation LLC-approved offsite disposal facilities licensed to accept petroleum-contaminated materials. Used oil filters generated by JF Brennan maintenance activities will be recycled offsite by Safety Kleen.

7.7 Spill Prevention, Control, and Countermeasure Provisions

The site grading plan is designed to minimize the likelihood of a discharge reaching navigable waters. This section of the Plan describes the likely spill scenarios and how the
facility is designed and operated to prevent a discharge from reaching the Lower Fox River.

7.7.1 Site Drainage
Drainage for the eastern land parcel drainage has been designed to flow into the storm water detention pond. Any spill occurring near the fuel tanks would flow toward this pond and action would be taken in order to prevent the fuel or oil from exiting the trap by means of an oil boom. Although manufacturer-provided overfill shut-off nozzles are installed on tanks, a failure of one of these devices during transfer (loading/filling) activities is anticipated to be the primary type of failure that could result in a discharge of oil to the environment. On the western land parcel, the fuel barrel is positioned approximately 150' from the water's edge. In the unlikely event of a discharge from the double walled fuel barrel, fuel would run west away from the Fox River towards the drainage way and eventually flow into the river south of the site.

7.7.2 Containment and Diversionary Structures
Given the distance between the eastern land parcel tanks and the Lower Fox River, an oil discharge is not expected to reach the river under the likely spill scenario described above. Flow would enter the storm water catch basins which flow to the onsite detention basin where oil would be captured and removed before it could flow out of the basin into the Lower Fox River. A discharge from the western land parcel tank would require an immediate implementation of oil containment boom and sorbent pads on land before the spill reached the smaller drainage way.

7.7.3 Secondary Containment for Aboveground Storage Tanks
The above ground storage tanks are manufactured with double-wall construction to contain any leakage due to container corrosion. Inspections of the interstitial space within the double walled tanks check for presence of oil. All tanks are tested by New Energy before use.

7.7.4 Practicability of Secondary Containment
Double-walled tank construction meets the requirements for secondary containment for above ground storage tanks. Containment during transfer activities is addressed by use of active secondary containment measures in accordance with 40 CFR 112.7(c). Active measures are implemented to prevent a discharge to navigable waters or adjoining shoreline. EPA SPCC Inspection Guidance (EPA, 2005) describes active measures as follows:

> Active containment measures are those that require deployment by the owner/operator of the facility. These measures are deployed either before an activity involving the handling of oil starts, or in reaction to a discharge so long as the active measure is designed to prevent an oil spill from reaching navigable water or adjoining shoreline.

7.7.5 Active Containment Measures During Transfer Activities
The following active containment measures are proposed for use by JF Brennan during oil transfer activities that occur at the site:
• Place booms or temporary soil dams in the sediment pond to contain and prevent oil released during a discharge event from flowing to the Lower Fox River or the adjoining shorelines.

• Place stormwater catch basin covers in the oil flow path to prevent oil from entering the onsite detention basin.

• Use spill kits in the event of an oil discharge that are strategically located and ready for deployment, to prevent a spill from reaching navigable waters or adjoining shorelines. The spill kit is sized to effectively contain a 50 gallon oil spill that could be potentially released during an overfill event.

7.7.7 Other Spill Prevention Measures

The following work practices will be implemented by JF Brennan personnel when handling oil stored in storage areas:

• Manual control of all outdoor oil transfer operations. The personnel performing the transfer shall remain in the area during the transfer to monitor the operation and check for any leaks and overflows.

• Grounding and bonding for transfer of liquids with a flash point of less than 140°F Fahrenheit or whose flash point is unknown.

• Regular inspection of containers for leaks, structural damage, and corrosion. Tanks are elevated 6 inches above the ground surface to allow for visual inspection for leaks.

• Limiting placement of tanks and containers to areas that are not subject to flooding.

• The tanks will be protected from moving traffic areas and lighted during nighttime operational hours.

• Oil transfer operations, such as loading/unloading and fueling of equipment, will be monitored at all times for leaks or spills. Sorbent pad or drip pans will be used at hose connections during transfer operations.

• Prior to departure of any New Energy LLC tank truck, the lower most drain and all outlets will be closely examined for leakage, and if necessary, tightened, adjusted, or replaced to prevent product leakage while in transit.

7.7.8 Inspections and Records

Inspections

Inspections of above ground storage tanks are conducted by JF Brennan personnel for leaks, corrosion, and condition of nozzles, hoses, and gauges. Maintenance and repairs will be made immediately or if necessary a new tank will be delivered to the facility by New
Energy LLC or other qualified vendor. Records of inspections will be kept for 3 years. Inspections will be done monthly.

7.7.9 Personnel, Training, and Discharge Prevention Procedures
All operations personnel receive initial 40-hour HAZWOPER training and 8-hour annual refresher training as required by Occupational Safety and Health Administration.

Operations personnel are familiar with the facility operations, safety procedures, and spill prevention and control procedures described in this SPCC Plan prior to working at the facility.

Spill prevention is a topic presented in a briefing to site operations personnel annually to ensure adequate understanding and effective implementation of this SPCC Plan. The briefing covers the following topics:

1. Roles and Responsibilities
2. SPCC Plan requirements
3. Policies and procedures related to spill prevention, control and notification
4. Procedures for routine handling of products (loading, unloading, transfer)
5. Lessons learned

8.0 REFERENCES


Wisconsin Department of Commerce, 2009. Chapter Comm10, Flammable, Combustible and Hazardous Liquids

NOTE: EXCAVATE EXISTING WETLAND FROM WEST SIDE STRIPPING AND EXCAVATION ACTIVITIES SEE SHEET C-9 FOR TEMPORARY SEEDING REQUIREMENTS.
ATTACHMENT B

CONTINGENCY PLAN

VOLUME I

At the

LOWER FOX RIVER
OPERABLE UNITS 2 THROUGH 5

In

Brown, Outagamie, and Winnebago Counties, Wisconsin

Prepared for:

Appleton Papers Inc.
Georgia-Pacific Consumer Products LP
NCR Corporation
CBC Coatings, Inc.
U. S. Paper Mills Corporation

For Submittal to:

Wisconsin Department of Natural Resources
U.S. Environmental Protection Agency

Prepared by:

Tetra Tech EC, Inc.
Anchor Environmental
J. F. Brennan
Boskalis Dolman

June 2008
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<td>3.4 Environmental Safety Supervisor</td>
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<td>3.6 Project Environmental and Safety Manager</td>
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<td>ACP</td>
<td>Access Control Personnel</td>
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<td>ACS</td>
<td>Access Control Station</td>
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<tr>
<td>AED</td>
<td>Automatic Electronic Defibrillator</td>
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<tr>
<td>AHA</td>
<td>Activity Hazard Analysis</td>
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<tr>
<td>CM</td>
<td>Construction Manager</td>
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<tr>
<td>CPR</td>
<td>cardiopulmonary resuscitation</td>
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<tr>
<td>DOT</td>
<td>U.S. Department of Transportation</td>
<td></td>
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<tr>
<td>EC</td>
<td>Emergency Coordinators</td>
<td></td>
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<tr>
<td>EHS</td>
<td>Environmental, Health and Safety</td>
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<tr>
<td>EPA</td>
<td>Environmental Protection Agency</td>
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<tr>
<td>ER</td>
<td>emergency response</td>
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<td>ESS</td>
<td>Environmental Safety Supervisor</td>
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<td>MSDS</td>
<td>Material Safety Data Sheet</td>
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<td>NFPA</td>
<td>National Fire Protection Association</td>
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<td>NRC</td>
<td>National Response Center</td>
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<tr>
<td>OSHA</td>
<td>Occupational Safety and Health Administration</td>
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<tr>
<td>OU</td>
<td>Operable Unit</td>
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<tr>
<td>PCB</td>
<td>polychlorinated biphenyl</td>
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<tr>
<td>PEL</td>
<td>Permissible Exposure Limit</td>
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<tr>
<td>PESM</td>
<td>Project Environmental and Safety Manager</td>
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<tr>
<td>PM</td>
<td>Project Manager</td>
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<tr>
<td>PPE</td>
<td>personal protective equipment</td>
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<tr>
<td>PRT</td>
<td>Project Response Team</td>
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<tr>
<td>RQ</td>
<td>reportable quantity</td>
<td></td>
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<tr>
<td>SHSP</td>
<td>Site-Specific Health &amp; Safety Plan</td>
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<tr>
<td>Tetra Tech</td>
<td>Tetra Tech EC, Inc.</td>
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<td>WDNR</td>
<td>Wisconsin Department of Natural Resources</td>
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1.0 INTRODUCTION

This Contingency Plan has been developed to define the procedures in order to minimize hazards to human health and the environment to be followed in the event of a fire, explosion, and spills of hazardous substances to the environment during the implementation of the Phase 2A activities at the Lower Fox River Operable Units (OUs) 2 through 5. This project has many hazards due to the nature of the activities being performed and due to existing site conditions (as well as changing site conditions due to the work activities). Emergencies that may occur include the following:

- Personnel injuries or other medical emergencies/incidents
- Natural disasters such as severe weather, flood, volcanic fallout, or earthquakes
- Fire or explosion
- Spills of hazardous substances
- Unauthorized entry, trespass, or site intruders
- Potential bomb threats or other terrorist related incidents
- Needs for personnel rescue operations
- Emergencies related to hazardous materials that are stored and used on site or hazardous wastes, which could under certain circumstances, pose a chemical, fire, spill, or explosion hazard

This Plan functions as an administrative tool for managing events and emergencies to safeguard human health and the environment for emergency preparedness and response purposes. The Plan addresses the minimum requirements outlined in the Administrative Order of Consent:

- Description of actions to be taken in response to fires or explosions (Section 8.4), or any unplanned sudden or non-sudden release of hazardous substances or toxic constituents to air, soil, or surface water on site (Section 9.0)
- An up-to-date list of names, addresses, and telephone numbers of primary and alternate Emergency Coordinators (ECs), who have the responsibility for responding in the event of an emergency by implementing this Plan (refer to Tables 7-1 and 7-2)
- Descriptions of arrangements agreed to by local police and fire departments, hospitals, contractors, and emergency response teams to coordinate emergency response services (Section 7.0)
- A list of emergency response (including first aid) and decontamination equipment, as well as location, description, and outline of capabilities where this equipment is required (Section 11.0)

1.1 SCOPE AND EMERGENCY CLASSIFICATIONS

This Plan applies to all personnel working at the Lower Fox River OUs 2 through 5 site including approved visitors and subcontractors. This Plan meets the requirements for emergency response and notification in accordance with the U.S. Environmental Protection Agency (USEPA), the Wisconsin Department of Natural Resources (WDNR), U.S. Department of Transportation (DOT), and the Federal Occupational Safety and Health Administration (OSHA).
It is anticipated (per potential hazards identified during project planning) that most site emergencies would result in the use of two classifications:

**Event.** For the purposes of this project, an event is:

- A minor injury or illness not requiring emergency response from local emergency response agencies
- Spills of hazardous substances to the environment (less than the reportable quantity [RQ]) resulting from site activities, including spills or releases from previous operations at the site of which site employees have become aware, and can be contained and cleaned up without assistance from local emergency response agencies
- A property, vehicle, or equipment damage case that results in minor damage not requiring local emergency response agencies
- A “near miss” or an event that has a reasonable probability of resulting in one of the outcomes described above if the circumstances were different and for which modifications to management programs shall reduce the probability of occurrence or the severity of the outcome

**Emergency.** An emergency shall be declared when events occur that represent a significant degradation in the level of safety or a threat to human health or the environment and that require time-sensitive / urgent response efforts and assistance from outside agencies. For the purpose of this Plan, an emergency is identified as an unexpected sudden situation requiring prompt action by specially trained personnel in order to prevent or mitigate severe injury to individuals, adverse impacts to the environment, or major damage to property.

Examples of some plausible emergencies include:

- Discovery of hazardous material contamination from past facility operations that is causing or may reasonably be expected to cause uncontrolled personnel exposure exceeding Permissible Exposure Limits (PELs)
- A spill of a hazardous substance to the environment that exceeds the RQ or is otherwise unable to be controlled adequately or safely by site personnel and site resources
- A person trapped in debris, at heights, in confined spaces, or in a hazardous atmosphere, requiring rescue
- An off-site hazardous material event not associated with the site activities that is observed to have or is predicted to have an impact on this site such that protective actions are required to protect workers
- An occurrence that causes or may reasonably be expected to cause significant structural damage, with confirmed or suspected personnel injury, death, or degradation in health and safety
- Any site evacuation in response to an actual occurrence that requires time-urgent response by specialist personnel or mutual aid groups not normally assigned to the site (e.g., fire department)
The plan prescribes preparedness, prevention, and response for plausible site emergencies including:

- Medical Emergencies (Section 8.2)
- Natural Emergencies such as Earthquakes or Severe Weather (Section 8.3)
- Fires and Explosions (Section 8.4)
- Unauthorized Entry, Trespass or Site Intruders (Section 8.5)
- Threat of Terrorist Activities (Section 8.6)
- Personnel Rescue (Section 8.7)
- Confined Space Rescue (Section 8.7.1)
- Spills of hazardous substances to the environment (Section 9.0)

Non-emergencies involving incidental response to minor incidents do not have the severity or damage potential of emergencies and can be controlled by site employees with basic first aid training or additional training for site-specific incidents such as small spill containment and clean-up.

Project emergencies involve further escalation of risks that potentially require outside assistance to respond and manage the emergency due to impact on site personnel, structures, site evacuation, off-site property, public, and the environment.

1.2 MAINTENANCE

The Project Manager (PM) has overall responsibility for ensuring this Plan is in place and implemented.

This Plan and contained procedures shall be reviewed and updated as required as the project transitions. At a minimum this Plan shall be reviewed on an annual cycle or immediately if implementation, audit, or change in site conditions or response to an emergency or drill demonstrates a need for revision. Revised copies of this Plan will be provided to emergency responders (e.g., local fire departments, local police or county sheriff, and local hospitals) by return receipt, certified mail.
2.0 SITE DESCRIPTION

The project study area includes the Lower Fox River and Green Bay aquatic systems. Approximately 270,000 people live in the communities along the river. The Lower Fox River is located in northeastern Wisconsin within the eastern ridges and lowlands of the state. The Lower Fox River is defined as the 39-mile portion of the Fox River, beginning at the outlet of Lake Winnebago and terminating at the mouth of the river into Green Bay, Lake Michigan. The river flows north and drains approximately 6,330 square miles, making it a primary tributary to Green Bay and a part of the Great Lakes system. Green Bay is a freshwater system approximately 120 miles long that drains into Lake Michigan, and is located on the state border between Wisconsin and Michigan along a northeast-to-southwest-trending axis. The bay portion of the site includes all of Green Bay from the city of Green Bay to the point where Green Bay enters Lake Michigan. The site has been divided into five discrete OUs by WDNR and USEPA. The river and the bay OUs are:

- OU 1 - Little Lake Butte des Morts
- OU 2 - Appleton to Little Rapids
- OU 3 - Little Rapids to De Pere
- OU 4 - De Pere to Green Bay
- OU 5 - Green Bay

The river has 12 dams and includes the highest concentration of pulp and paper mills in the world. During the 1950s and 1960s, these mills routinely used polychlorinated biphenyls (PCBs) in their operations, which ultimately contaminated the river.

Two facilities will be established as part of the remedial action. The former Shell site will be used for support facilities, dewatering operations, wastewater treatment operations, and material handling. A second upland facility will be necessary to support the capping and cover material placement south of the De Pere Dam. This site will be used for staging of sand and armored cap material.

2.1 ACCESS/EGRESS AND UTILITIES

There is limited public access to the site due to access controls in place, including fences and locking gates. Access controls to the facility minimize the possibility of uncontrolled access to the site. A site layout map has been developed for the former Shell site and is provided in the Volume I Work Plan. However, it has not been finalized. Once finalized, this site layout map will be revised to show the roadways, gates, emergency evacuation routes, as well as utilities such as power and water.
ATTACHMENT B
Project Contingency Plan
3.0 EMERGENCY MANAGEMENT ORGANIZATION AND RESPONSIBILITIES

The following sections describe the roles and responsibilities of key project personnel in relation to emergency responses. Contact information is summarized in Tables 7-1 and 7-2.

3.1 PROJECT MANAGER

The Tetra Tech EC, Inc. (Tetra Tech) PM has overall responsibility for the maintenance, implementation and enforcement of this Plan and ensures that all project personnel implement this Plan. Additionally, the PM shall:

- Identify the EC and alternates.
- Ensure that resources are available for proper training of emergency response personnel and that appropriate emergency response equipment is available.
- Ensure that this plan is rehearsed as necessary.

3.2 CONSTRUCTION MANAGER

The Tetra Tech Construction Manager (CM) is responsible for managing the work execution by the subcontractors, craft workers, and suppliers to achieve conformance with the project plans and procedures. The CM will have direct responsibility for the implementation of this Plan through project operations including project implementation and staff direction. Additionally, the CM shall:

- Serve as the alternate EC and have the ability and authority to commit resources to manage an emergency event and mitigate consequences to workers, the public, and the environment.
- Designate and coordinate response actions, as appropriate or necessary, including assistance of the Project Response Team (PRT).
- Contact/activate the Emergency Response (ER) personnel/agencies, as necessary.

The Environmental Safety Supervisor (ESS) will serve as the EC and the CM as the alternate EC. The EC is responsible for:

- Implementing this Plan utilizing available resources and experts as needed
- Providing, when necessary, information about the nature and duration of work expected on the site, types of contaminants or hazards, possible health or safety effects, and anticipated emergency conditions to emergency services personnel (e.g., fire department, police, hospital, emergency response)
- Determining the content and frequency of drills
- Reviewing this Plan whenever audit, implementation, site conditions, personnel, or management identifies need or opportunity for improvement
- Ensuring that this Plan is critiqued after actual implementation or drills
- Coordinating responses during an emergency
The EC shall have a detailed understanding of response actions to secure and control emergencies, evacuation of on-site and off-site individuals and disaster planning.

The EC will be contacted for all emergencies and events on site. The EC phone numbers and home addresses will be maintained at the on-site office trailer, dewatering building, and wastewater treatment plant. The EC will activate the emergency response, as appropriate, and request assistance from the PRT and other site personnel as required.

The EC determines and directs the level of response required including the implementation of emergency evacuation and disaster recovery. The EC is responsible for ensuring that appropriate project personnel are contacted and kept informed. Follow-up coordination will be conducted as needed including assisting the PM with regulatory agency notification, incident documentation, review for process improvements, and adequacy of training or review of emergency response mechanisms.

The EC will be the primary point of contact for outside response authorities. The EC will maintain coordination with the local response agencies (local fire departments, local fire department HAZMAT team, etc.) prior to their arrival and during the response.

The EC will assume control of all emergency events upon arrival at the scene. The EC will relinquish control of emergency scene only to more highly trained or specially trained responders upon their arrival as appropriate (i.e., confined space rescue or fire). The EC will have competency in the following areas:

- Know how to implement this Plan and other applicable project plans.
- Know and understand the hazards and risks associated with project activities and specific site areas and equipment.
- Know and utilize PRT members as necessary, for incident and emergency response.
- Know the state and local agencies available for emergency response and their capabilities.

### 3.3 Access Control Personnel

At the main entrance of the former Shell Site, a security guard booth (i.e., Access Control Station [ACS]) will be constructed and staffed by local personnel to restrict access to the site. The ACS is the initial contact and communications center for site emergencies. Access Control Personnel (ACP) will be trained to immediately respond as directed and as outlined in this Plan. Their responsibilities will include:

- Monitoring of the site radio and telephone communications for emergencies
- Notifying the EC and Project Manager in the event of access by unauthorized person(s)
- Notifying emergency response units as directed by the EC and directing the units to appropriate location(s)
- Controlling access to the site and maintaining a log of authorized site visitors

### 3.4 Environmental Safety Supervisor

The site ESS is Mr. Bill Welch who will provide pre-emergency task analyses prior to initiating field activities and at each new and discernible feature of work, and functions as the health and safety as well as environmental compliance lead for the project. The ESS reports through the
project organization to both the CM and the Project Environmental and Safety Manager (PESM). The ESS is responsible for:

- Confirming the posting of emergency telephone numbers
- Maintaining and posting site maps marked with evacuation routes and on-site location of emergency response equipment and supplies
- Maintaining inventories of on-site emergency response equipment and supplies and capabilities
- Reviewing emergency response plan(s) and in the event of a plan failure, submitting revision comments to the EC, PM, and PESM
- Providing assistance to the EC during an emergency event
- Providing, in the event that an emergency or incident involves the exposure of project personnel to hazardous or toxic materials, Material Safety Data Sheets (MSDSs) to emergency personnel to accompany the worker to the medical facility
- Inspecting and evaluating hazardous substance storage and handling operations
- Understanding and implementing requirements of the Site-Specific Health and Safety Plans (SHSPs)
- Maintaining a log of incident communications
- Documenting accurately and completely all emergency notifications

3.5 PROJECT RESPONSE TEAM

The PRT consists of the PM, CM/EC, and ESS who have specialized training, experience, knowledge, and skills in initial emergency response, safety, environmental compliance, waste management, and construction. They will assist the EC to provide both guidance and applied field response to incidents and emergencies, as required or indicated.

3.6 PROJECT ENVIRONMENTAL AND SAFETY MANAGER

The PESM is a Tetra Tech senior specialist assigned to assist the PM in the development of the project-specific Environmental, Health and Safety (EHS) plans and in the implementation of EHS programs. The PESM has approval authority for EHS issues and reports to both the Project and the Tetra Tech Director of EHS Services. The PESM shall:

- Assist in the development, implementation, oversight, and enforcement of project ESQ plans
- Review incident reports and results of inspections
- Conduct periodic (e.g., quarterly) inspections
- Assist in major incident investigations
- Perform audits and assessments to determine that project ESQ plans are being fully implemented
3.7 SITE PERSONNEL

All site personnel are responsible for understanding how to respond in the event of an incident or emergency. These actions are addressed in this Plan and discussed in site orientation training. Site personnel are expected to notify their supervisor of impending or actual incidents and emergencies and to cooperate fully with the requirements of this document. Information obtained shall be immediately communicated to the EC. All employees shall participate in site-specific safety orientation. All other personnel entering the site (e.g., visitors, vendors) will be given a modified briefing on this Plan. Modified details will be determined by the visitor’s status (escorted or unescorted access) and the stated reason for site access.

Emergency preparedness, prevention, and response are core elements included in the site-specific safety orientation curriculum.

3.8 PROJECT FIRST AID/CPR RESPONDERS

Minor first aid and medical response stabilization will be available on site. Various project personnel are required to have up-to-date first aid and cardiopulmonary resuscitation (CPR) training. A list of First Aid and CPR trained personnel will be maintained in the project files. Off-site medical care will be used if the medical injuries or illnesses require further evaluation or treatment. The routes to the nearest hospital (and alternate) will be posted in the office trailer, dewatering building, wastewater treatment plant, and elsewhere as required.
4.0 EMERGENCY MANAGEMENT

4.1 GOALS AND OBJECTIVES

The primary objective of this Plan is to ensure consistent implementation of emergency response during the life of the project, and includes:

- Pre-emergency planning, including the identification of hazards and threats and hazard mitigation
- Actions to take in the event of an emergency
- Identification of personnel and maintenance of resources needed for an effective response

4.2 PRE-EMERGENCY PLANNING

Pre-emergency planning will be conducted to identify potential hazards and threats, define hazard mitigation strategies, and prescribe the appropriate response(s) as discussed within this Plan. Reviewing the hazards at each level or stage of the project or task is critical to effective pre-emergency planning. Additionally, the SHSP and Activity Hazard Analysis (AHA) developed for on-site activities identify, evaluate, and propose the appropriate hazard controls.

Pre-emergency protective actions assure worker safety is implemented consistently across the project. Some of these protective actions include:

- Use of administrative controls, including development and implementation of task- or area-oriented work plans, such as AHAs, to be used in the field which are based on actual site conditions and hazards of the work area
- Use of engineering controls
- Use of qualified and trained personnel
- Use of readily available spill containment and clean-up materials and emergency equipment

All site personnel shall be trained to applicable requirements of this Plan during site orientation training and shall be provided with updates as the Plan is updated or changed.

The procedure for assessing chemical hazards in the workplace during an emergency or incident (including the need for evacuation) includes the determination of the hazardous properties of released materials by the following:

- Reviewing MSDSs for commercial chemical products or materials
- Reading container labels
- Process knowledge
- Sampling and analysis (if needed)

Determination of potential danger to human health and the environment during an emergency shall include evaluation of the following factors:

- Proximity of the emergency location to other hazardous sources
- Compatibility with other materials
- Potential routes for hazardous run-off or exposure
- Environmental conditions and transport mechanisms for airborne releases (for example, wind speed, wind direction, temperature)
- Delineation of hazard boundaries
- Amount, concentration, or rate of release of material

The initial assessment of chemicals and hazardous materials in the workplace will be made for contingency planning purposes. In the event of an actual emergency, the EC will evaluate the above factors and determine a suitable response.
5.0 FIRE PREVENTION AND PROTECTION

The primary protective measures implemented to manage the threat of fire or explosion during project implementation include:

- Project plans and procedures, SHSP, AHAs, etc.
- This Plan
- Employee awareness and training
- Safe work practices including selection of the appropriate tools for the task
- Proper use, storage, and labeling of flammable liquids and gases
- Appropriate postings in areas where flammable liquids and gases are used or stored
- Fire extinguishers readily accessible in the work area
- MSDSs available on site for flammable materials in the workplace
- Hot Work Permits for cutting, welding or other spark-producing activities and fire watch (if required). Hot Work Permits must be obtained through the ESS.

5.1 HOUSEKEEPING

- Work areas shall be kept reasonably clean.
- Trash, refuse, and scrap materials shall be removed and placed in the proper containers for disposal.
- Containers shall be provided for the collection and separation of waste, trash, oily or used rags, and other refuse.
- Containers will be marked as to their contents.
- Containers shall be appropriate for the material being placed in them and shall have appropriate lids.
- If hot work is performed, combustible materials will be removed or protected from a radius of 50 feet from the hot work area, and the area will be clear of flammable vapors and dusts.
- Compressed gas cylinders will be stored and handled properly in accordance with the SHSP.

5.2 MATERIAL STORAGE, HANDLING & USE

- Materials shall be stored, handled, or stockpiled with due regard to their fire characteristics.
- Cabinets for storage of flammable materials shall be appropriately labeled to indicate the flammables storage.
- Only approved containers and portable tanks shall be used for storage and handling of flammable and combustible liquids.
• Portable fuel tanks (if used), not exceeding 660 gallons, shall be provided with emergency venting and other devices, as required by chapters II and III of The Flammable and Combustible Liquids Code, NFPA 30-2000.

• Leakage or spillage of flammable or combustible liquids shall be contained, cleaned up, and disposed of promptly and safely.

• Flammable liquids may be used only where there are no open flames or other sources of ignition within 50 feet of the operation, unless conditions warrant greater clearance.

• Tank trucks shall comply with the requirements covered in the Standard for Tank Vehicles for Flammable and Combustible Liquids, NFPA No. 385—2000.

• A Hot Work Permit system will be used for welding, cutting, grinding, and related activities that pose a potential ignition source hazard.

5.3 MAJOR WORKPLACE FIRE HAZARDS

The major fire hazards in the workplace are:

• Small quantities (i.e., a few gallons or less) of flammable materials stored in flammable cabinets
• Portable gas cans that may be in service and used during work hours
• Flammable gases (oxygen and acetylene)
• Fuel tanks on heavy equipment
• Flammable waste in waste accumulation areas (e.g., waste aerosol cans)
• Propane gas for forklifts, space heaters, steam cleaners, etc.
• Combustible materials stored close to heaters in office areas or in hot work zones

Personnel are required to handle fire hazards in accordance with site practices. Small quantities of flammable materials are required to be stored in Flammable Storage Cabinets, and cabinets will be available for use at the site. Periodically, the site ESS will inspect these cabinets to ensure rated storage capacities are not exceeded.

Portable flammable liquid containers shall be approved by Underwriters Laboratories and will be clearly labeled to identify contents. Containers of gasoline and diesel shall be of steel construction.

Flammable gases shall be stored in bottle racks when not in service. In-service bottles shall be appropriately secured in the service vehicles or to weld carts. Empty bottles shall be stored in bottle racks and properly secured.

Heavy equipment refueling (diesel and/or gasoline) will be conducted using a delivery truck equipped with the required protective equipment and/or having bulk storage on site. Bulk storage containers will be stored in secondary containment that meets 110 percent of the largest container, or double-walled storage tanks may be used instead of secondary containment. A properly rated fire extinguisher will be located adjacent to the fuel storage facility. The tank and containment will be inspected regularly (i.e., during the weekly EHS Inspections or monthly if double-walled tanks are used) to verify that the tank is in good condition and that rainwater is emptied from the containment area. MSDSs for on-site fuels will be made available to all site
personnel. When refueling, personnel will place a drip pan or spill pads underneath the pump to catch any spillage or overflow. Smaller equipment will be driven off site for fueling at a service station.

5.4 Potential Ignition Sources and Hazards
Potential ignition sources at the site are minimized to the extent practical. Primary sources of ignition are grinding operations, welding and hot cutting operations, and personnel smoking.

Fire hazards are controlled through the use of engineering and administrative controls. Engineered controls include use of Flammable Storage Cabinets, use of internally grounded fill nozzles on the fuel tank pumps, use of fire-resistant materials under welding, cutting, grinding areas, and the use of fire rated materials or distance to separate flammable gases. Portable battery-powered lighting equipment, used in connection with the storage, handling, or use of flammable gases or liquids, shall be of the type approved for the hazardous locations/material.

Administrative controls that are utilized include use of Hot Work Permits with a fire-watch, and good housekeeping. Smoking is prohibited except in approved areas designated by the CM and ESS. Areas with operations that constitute a fire hazard shall be conspicuously posted with signs stating “No Smoking or Open Flame.” Laydown areas shall be regularly inspected for fire hazards, and hazards shall be removed as appropriate.

Equipment fueling shall be performed per manufacturers’ recommendations with special care taken to prevent splashing or otherwise allowing fuel to come into contact with hot surfaces, such as mufflers or exhaust pipes. Fuel delivery trucks and bulk fuel storage areas will be posted with conspicuous and legible signs prohibiting smoking in the vicinity and during refueling. Grounding and bonding will be utilized during dispensing of fuels.

Electrical wiring and equipment for light, heat, or power purposes shall be installed in compliance with the requirements of current electrical codes.

Equipment powered by internal combustion engines shall be located so that the exhausts are away from combustible materials.

Open yard storage of combustible materials shall be stockpiled with due regard to the stability of piles and in no case higher than 20 feet.

5.5 Actions to Prevent Spread of Fire
Actions to prevent the spread of fires include:

- Prompt notification
- Accessible fire extinguishers of the correct type and size within a work area or piece of equipment (incipient-stage use)
- Fire-fighting services are provided by the local fire department
- Collecting and properly containing released material(s)
- Segregated storage of flammable materials

5.6 Site Fire Extinguishing Equipment
All on-site fire extinguishing equipment is expected to be used only for the control or extinguishing of early-stage or incipient-stage fire situations. Incipient fires are those that have
just begun and are small enough not to reduce visibility, create a smoke inhalation hazard, or pose high-temperature risks. Fire control or extinguishing efforts should be conducted to aid escape, extinguish burning clothing, and stop a small fire. All fire extinguishing training procedures should be followed to minimize additional risks. The local fire department will be called to respond to and control the situation for any fires beyond the incipient stage.

Portable fire extinguishers are located throughout the active project work areas, in hot work areas, and on operating equipment, and are inspected on a regular basis.

As part of the design of the former Shell site a fire protection system will be constructed for the facility. Currently, there are no on-site fire hydrants. This will be addressed as part of the design of the facility.
6.0 TRAINING

Site personnel will receive awareness training to ensure understanding of those elements of this Plan that are pertinent to their correct and timely actions. This training will be given initially and refresher training shall be conducted at least annually (if the project duration exceeds one year). Training initially will be given during the site orientation training.

A few of the pertinent elements of the required training for site personnel are as follows:

- Responsibilities for reporting of events or accidents
- Spill notification requirements
- Location of the assembly areas/staging area
- Sound of the evacuation alarm
- Initial actions to take when the evacuation alarm sounds

Additional emergency or awareness training that may occur is as follows:

- Subject-Specific Training Classes (as necessary for site personnel)
- Supervisors and safety representatives are currently trained on first aid, CPR, and blood-borne pathogen precautions
- Fire extinguisher usage for incipient fires
- Hazardous material and hazardous waste awareness-level and function-specific training

In addition to the above training, site personnel also will be trained on the following topics:

- An understanding of the types of activities in their work area(s) that pose a significant potential risk in case of an incident or accident and potential outcomes of those events
- How to recognize that a potentially hazardous event is occurring and the hazards that could be encountered during an incident or accident
- The appropriate actions to take to mitigate the potential hazards that may occur from an incident or accident
- Understanding of roles/functions in an incident or emergency, with a primary focus on personal safety and safety of others through prompt notification, securing of operations (if possible), proper evacuation (if necessary), and appropriate measures for control, containment, and clean-up dependent on the type of incident/emergency
- As appropriate for type of work area and potential incident/emergency, the use of equipment for response to, and control of, incidents/emergencies (e.g., fire extinguishers, spill control equipment)
- The ability to recognize and report when additional resources may be necessary to more effectively mitigate or control an event

The PRT is comprised of the PM, the CM, and the ESS, all of whom have specialized training, experience, and skills in health and safety, environmental compliance, engineering, and construction, who can supervise and coordinate a response to assist the EC in the event of an emergency.
6.1 **Respiratory Protection**
Employees who may use respiratory protection shall be properly trained, medically reviewed, and fit tested.

6.2 **Confined Space**
**There is no confined space entry allowed on this project at the present time.** No person will enter or break the plane of any confined space for any reason unless confined space procedures are developed, personnel are trained, and an AHA has been developed and put into place with the proper monitoring and supervision.

Confined spaces present at the site include, but may not be limited to:
- Wastewater treatment storage and process tanks
- Stormwater and sanitary sewers and manholes
- Pits or vaults (if present)
- A covered roll-off box

Should the need for confined space entry be required, this Plan will be amended to include confined space entry requirements. Personnel who perform confined space entry must be trained. Should a person not adhere to the “no entry” requirement and become trapped, any rescue response would be performed by the local fire department. No confined space rescue equipment is being maintained on the site and no person is authorized to enter a confined space for rescue purposes.

6.3 **Refresher Training**
All project staff shall receive refresher of required training as required or indicated. Training may include formal classroom training, tabletop simulations, and emergency response drills (discussed in following section).

6.4 **Training Records**
The ESS will ensure that applicable training records are kept for site personnel. Examples of applicable training records are:
- Employee orientation and attendance records
- Contingency Plan training documentation
- First Aid/CPR documentation
- Hazardous materials and waste management training as well as function-specific training
- OSHA HAZWOPER training, medical clearance, and fit test results
- Specialized training (mobile equipment, fall protection, etc.)

6.5 **Drills**
This Plan will be tested periodically. Drills shall be used to ensure site and emergency response support organizations have a clear understanding of their roles and responsibilities, and to ensure required capabilities are available and operable. Emergency drills shall be planned and documented to test the total system or components of the system. A drill will be conducted at
project startup and as needed should conditions change. The procedures will be critiqued (both in drills and after actual or perceived emergencies) to verify that the procedures work; if the procedures do not work, the Plan will be modified. The critique should include:

- The date of the drill or plan activation
- A chronological summary of the incident or exercise
- Description of activities taken or decisions made by site personnel
- Types of monitoring performed during the event
- Injuries, illnesses, or potential exposures during the emergency
- Deficiencies noted and recommended corrective action
7.0 NOTIFICATIONS AND LINES OF COMMUNICATION

7.1 ON-SITE COMMUNICATION AND NOTIFICATIONS

Tables 7-1 and 7-2 lists applicable site contact information. In the event of an imminent or actual emergency situation, site personnel discovering the emergency situation shall immediately notify the EC. The EC shall then notify all site personnel by voice, radio, or telephone. Personnel shall be informed about the hazard and the appropriate response. The EC shall communicate emergency status (i.e., to be on heightened awareness, proceed to assembly areas, or to evacuate the facility and report to the staging area).

Should a project worker be the first to observe an emergency, the worker shall notify his/her supervisor by the best means available and take appropriate action(s). The appropriate action(s) shall be commensurate with the degree of hazard associated with the emergency situation and the emergency response training of the individual. The supervisor shall immediately notify the EC and ensure that the work crews are accounted for and evacuated if necessary.

Of prime concern during any emergency is clear communication regarding the nature of the emergency such as: location of incident, type of incident (fire, explosion, injury [if any]), number of affected personnel or potentially impacted site and off-site personnel, and any current or planned activities in progress to mitigate the emergency. The proper information regarding the nature of the incident is paramount in order to get the proper level and type of emergency response. The ACP when directed by the EC will assist in contacting the off-site emergency responders and reporting the conditions (e.g., fire, hazardous releases).

The primary form of communication at the project site during an emergency between field groups and the EC is by via two-way radios. The EC and ESS shall be accessible by telephone (land and cellular) or radio. The emergency telephone list shall also have the off-site emergency phone numbers of key site personnel and emergency responders. If the EC will be off site, the alternate EC will be designated and on-call.

Routine activities require project management personnel, the EC, ACP, and other project personnel (teams) to carry two-way radios. A radio unit is also located in the ACS. In the event of an emergency, everyone will be instructed to “clear the channel except for emergency use only.” Evacuation notices and information will be broadcast over the radio at the site.

Cellular phones are located in the project office trailer and the ACS. Emergency contact phone numbers are posted at the ACS and office trailer, as well as in other buildings.

The EC shall immediately notify the CM, PM, and PESM for any major incidents:

- Evacuations of any part of the site
- Local medical response for project personnel
- Fatalities or hospitalization of project personnel
- Fire department response for rescue or to extinguish fire
- Hazardous materials team response
- Notification of regulatory agencies
<table>
<thead>
<tr>
<th>EMERGENCY CONTACT</th>
<th>LOCATION</th>
<th>PHONE NUMBER</th>
<th>OUs</th>
<th>NOTIFIED</th>
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</thead>
<tbody>
<tr>
<td><strong>HOSPITALS</strong></td>
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<tr>
<td>Bellin Hospital</td>
<td>744 S. Webster Avenue Green Bay, WI 54301</td>
<td>911 or 920-433-3500</td>
<td>2,3,4,5</td>
<td></td>
</tr>
<tr>
<td>St. Vincent Hospital</td>
<td>835 S. Van Buren Street Green Bay, WI 54301</td>
<td>911 or 920-433-0111</td>
<td>3,4,5</td>
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<tr>
<td><strong>Work Care Facilities</strong></td>
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<tr>
<td>Theda Care at Work</td>
<td>2009 Memorial Drive Appleton, WI 54915</td>
<td>920-380-4999</td>
<td>2,3</td>
<td></td>
</tr>
<tr>
<td>Contact: Mary Schrader or Cheryl Marx</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Prevea Workmed Voyager</td>
<td>3021 Voyager Drive Green Bay, WI 54311</td>
<td>920-496-4760</td>
<td>3,4,5</td>
<td></td>
</tr>
<tr>
<td>Contact: Debbie</td>
<td></td>
<td></td>
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<tr>
<td><strong>Fire Department/EMS</strong></td>
<td></td>
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<tr>
<td>Green Bay Fire Department</td>
<td>501 S. Washington Street Green Bay, WI 54301</td>
<td>911 or 920-448-3280</td>
<td>3,4,5</td>
<td></td>
</tr>
<tr>
<td>Ashwaubenon Fire and Rescue</td>
<td>2155 Holmgren Way Green Bay, WI 54304</td>
<td>911 or 920-492-2312</td>
<td>3,4,5</td>
<td></td>
</tr>
<tr>
<td>De Pere Fire/EMS</td>
<td>400 Lewis Street De Pere, WI 54115</td>
<td>911 or 920-339-4087</td>
<td>2,3</td>
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</tr>
<tr>
<td>Wrightstown Fire Department</td>
<td>961 Broadway Street Wrightstown, WI 54180</td>
<td>911 or 920-532-4556</td>
<td>2,3</td>
<td></td>
</tr>
<tr>
<td>Kaukauna Fire Department</td>
<td>206 West 3rd Street Kaukauna, WI 54130</td>
<td>911 or 920-766-6320</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Kimberly Fire Department</td>
<td>515 W. Kimberly Avenue Kimberly, WI 54136</td>
<td>911 or 920-788-9805</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td><strong>Police</strong></td>
<td></td>
<td></td>
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<tr>
<td>Brown County Sheriff's Department</td>
<td>300 East Walnut Street Green Bay, WI 54301</td>
<td>911 or 920-448-4219</td>
<td>2,3,4,5</td>
<td></td>
</tr>
<tr>
<td>Green Bay Police Department</td>
<td>307 South Adams Street Green Bay, WI 54301</td>
<td>911 or 920-448-3200</td>
<td>2,3,4,5</td>
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<tr>
<td><strong>U.S. Coast Guard</strong></td>
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<tr>
<td>Station Green Bay</td>
<td>P.O. Box 8486 Green Bay, WI 54308</td>
<td>VHF Radio Channel 16 for distress calls</td>
<td>2,3,4,5</td>
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<tr>
<td><strong>Poison Control Center</strong></td>
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<td></td>
<td>800-222-1222</td>
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<tr>
<td><strong>Hazardous Materials Spill Response Units</strong></td>
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<tr>
<td><strong>Fire Department/EMS</strong></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Appleton Fire Department</td>
<td>700 N Drew St Appleton, WI 54911</td>
<td>911 or 920-832-5813</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Green Bay Fire Department</td>
<td>501 S. Washington Street Green Bay, WI 54301</td>
<td>911 or 920-448-3280</td>
<td>3,4,5</td>
<td></td>
</tr>
<tr>
<td>Ashwaubenon Fire and Rescue</td>
<td>2155 Holmgren Way Green Bay, WI 54304</td>
<td>911 or 920-492-2312</td>
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### Table 7-1

<table>
<thead>
<tr>
<th>EMERGENCY CONTACT</th>
<th>LOCATION</th>
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<td>911 or 920-339-4087</td>
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<td>911 or 920-766-6320</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Kimberly Fire Department</td>
<td>515 W. Kimberly Avenue, Kimberly, WI 54136</td>
<td>911 or 920-788-9805</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>CHEMTREC Chemical Transportation Emergency Center</td>
<td>1300 Wilson Boulevard, Arlington, VA 22209</td>
<td>800-424-9300 (703-741-5525)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>National Response Center</td>
<td>United States Coast Guard (G-OPF), 2100 2nd Street, Southwest – Room 2611, Washington, DC 20593-0001 USA</td>
<td>800-424-8802 (202-267-2675)</td>
<td></td>
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</tr>
</tbody>
</table>

### Notes:

1. CHEMTREC® (Chemical Transportation Emergency Center) is a public service of the Chemical Manufacturers Association. However, CHEMTREC® is not intended nor equipped to function as a general information source.
   - CHEMTREC® DEALS ONLY WITH CHEMICAL TRANSPORTATION EMERGENCIES!
   - In the event of chemical transportation emergency, CHEMTREC® provides immediate advice for those at the scene of emergencies, then promptly contacts the shipper of the chemicals for more detailed assistance and appropriate follow-up.
   - OPERATES AROUND THE CLOCK – 24 HOURS A DAY, 7 DAYS A WEEK TO RECEIVE EMERGENCY CALLS. IN CASE OF CHEMICAL TRANSPORTATION EMERGENCIES, CALL ONE OF THE FOLLOWING NUMBERS:
   - Continental United States: (800) 424-9300 direct dial, toll free (WATS) number
   - Outside of Continental USA: (703) 527-3887 (This number may be called collect)
   - CHEMTREC® provides hazard information warnings and guidance when given the NAME OF THE PRODUCT and the NATURE OF THE PROBLEM. For more detailed assistance, provide the following information:
     - Name of caller and call-back number; Location of problem; Shipper or manufacturer; Container type; Rail car or truck number; Carrier name; Consignee; Local conditions.

2. The National Response Center (NRC) maintains a 24-hour-per-day, 7-day-a-week, 365-day-a-year Operation Center where all information is received via the toll-free number, entered directly into an on-line data base system, and electronically disseminated as part of the National Response System. Once contacted, the NRC Duty Officer will guide the caller through a detailed series of questions based on the Standard Report Form to gather as much information as possible concerning the spill or release. The information is immediately entered into the Incident Reporting Information System (IRIS) and based on several pre-established criteria including material involved, mode of transportation, injuries, damage, and fatalities, select federal agency notification will take place within 15 minutes of receipt. When any of the following incidents occur, the NRC should immediately be contacted by the responsible party via the toll free number. If you see or discover an oil spill or release of chemicals and are NOT the responsible party, you should contact the NRC with whatever information you have.

### Chemical Releases

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) requires that all releases of hazardous substances exceeding reportable quantities be reported by the responsible party to the National Response Center. Title 40 of the Code of Federal Regulations Part 302 promulgates reportable quantities and reporting criteria. All the Extremely Hazardous Chemicals (EHC) that overlap with the CERCLA listed chemicals table (40 CFR 302.4) should be reported to NRC.

### Other Releases

Discharges from a hazardous waste treatment or storage facility must be reported by the emergency coordinator at the facility. Abandoned dump or waste sites should be reported by anyone having knowledge of such a site.
Contingency Plan
Volume I
Lower Fox River (OU 2 through 5)
Table 7-2
Site Contact Numbers

<table>
<thead>
<tr>
<th>CONTACT</th>
<th>PHONE NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Manager—Ray Mangrum</td>
<td>C (713) 876-8528</td>
</tr>
<tr>
<td>CM/Alternate EC—Mike Estess</td>
<td>C (803) 646-0938</td>
</tr>
<tr>
<td>ESS/EC—Bill Welch</td>
<td>C (330) 208-5630</td>
</tr>
<tr>
<td>PESM—Grey Coppi</td>
<td>(973) 630-8101 C (215) 327-0751</td>
</tr>
<tr>
<td>Tetra Tech Director EHS Services—Phil Bartley</td>
<td>(509) 372-5818 C (509) 521-4898</td>
</tr>
<tr>
<td>Medical Consultant (Dr. Greaney)</td>
<td>(800) 455-6155</td>
</tr>
</tbody>
</table>

- Other emergency situations requiring outside notification/response
- Injury-free event with significant damage to property, equipment, or the community (fire, explosion, release, damage > $2,000, or that generates media or law enforcement activity)

Tetra Tech will notify the PESM within 24 hours of the following:

- All injuries
- Industrial illnesses
- Injury-free events
- Property damage incidents

7.2 MEDICAL SUPPORT AND FACILITIES

First Aid/CPR trained personnel will administer minor first aid on site. Non-emergency medical treatment will be provided at local urgent care/occupational medicine providers. Medical emergencies requiring additional evaluation/treatment will be provided by local emergency services, which can be contacted by calling 911. The nearest hospital with emergency services and the nearest Work Care facility will be identified for site personnel prior to the start of work activities. The Work Care facility will be used for illnesses or injuries that are not life threatening, but require medical care. Local emergency service providers (including medical facilities and fire departments) will render emergency response assistance for the project site. Victims of serious injuries shall be transported by ambulance to the primary or secondary emergency medical facility.

Tetra Tech shall ensure that specific employees on site hold current cardiopulmonary resuscitation (CPR) certifications, including Automatic Electronic Defibrillator (AED) training and first aid training as specified by corporate training requirements. First aid kits shall be located on site for minor injuries. AEDs will be available in the Support Zone. All injuries and near misses shall be reported promptly to the Tetra Tech ESS for evaluation and proper case management through WorkCare (Tetra Tech’s corporate medical consultant).

Location maps to the emergency medical facilities (hospital) and Work Care facility are given in Appendix A. The closest emergency medical facility and Work Care facility will be posted in the office trailer (or in site vehicles or site boats if no office trailer is located nearby), the ACS, and other buildings on site. Directions to the closest facility will be determined and posted along with the location maps.
7.3 **OUTSIDE RESPONDERS**
Depending on the nature of the emergency, the EC may determine that it is necessary to contact outside emergency responders and/or 911 (police, fire department, ambulance service). Organizations and project personnel will be contacted by the EC as site events require and allow.

Location maps for the local fire departments are provided in Appendix B. Additional supporting stations are also available to respond if necessary for services such as hazardous material responses or rescue operations.

Emergencies require an increased alert status for on-site personnel and off-site authorities. Other organizations and project personnel will be contacted by the EC as site events require and allow. Emergency contact numbers are posted in the office trailer, the ACS, and the other buildings on site.

7.4 **INCIDENTS REQUIRING REGULATORY AGENCY REPORTING**
There are mandatory notification requirements for certain types of hazardous substance spills to the environment. A spill is defined as an unanticipated release of a hazardous substance, including oils, to the environment. This includes releases to soil, water, and air. The State of Wisconsin guidelines will be used to determine reportable quantities for releases as noted in Table 7-3. If it involves PCBs, the spill or release may require notification to EPA and in some instances, a direct phone call to the EPA Region 5 Administrator. The Regulatory Specialist will assist the EC, CM, and PM to determine reporting requirements. Should a reportable spill/emission occur, site personnel are required to immediately notify the onsite EC and CM. The PM or designee will be responsible for notifying the regulatory agencies identified in Table 7-3.

To the best of his/her ability, the person notifying the regulatory agencies should be able to provide the following information:

- Location of the spill
- The substance spilled
- Quantity spilled
- Concentration of the spilled substance
- Responsible entity for the spilled the substance
- Status of spill clean-up
- Any resource damages immediately discernible (e.g., dead fish or oiled birds)
- Contact information (name and phone number of person reporting spill)
<table>
<thead>
<tr>
<th>Contact</th>
<th>Phone Number</th>
<th>Time Frame</th>
<th>Release Notification Requirement</th>
</tr>
</thead>
</table>
| National Response Center            | 1-800-424-8802 | As soon as possible, but no later than 12 hours | Transportation-related (including loading/unloading, and temporary storage) incidents involving hazardous materials (including hazardous wastes)
  - Hazardous Materials are listed under 49 CFR 172.101
  - As a direct result of hazardous material
    - A person is killed,
    - A person receives an injury requiring admittance to a hospital.
    - The general public is evacuated for 1 hour or more;
    - A major transportation artery or facility is closed or shut down for 1 hour or more
    - The operational flight pattern or routine of an aircraft is altered
  - There has been a release of a marine pollutant in a quantity exceeding 119 gallons for liquids or 882 pounds for solids
  - Release of a hazardous substance equal to or exceeding the reportable quantity (see 40 CFR 302 – Table 302.4) |
| National Response Center (or if direct notification to the NRC is not practical, reports can be made to the Coast Guard) | NRC: 1-800-424-8802, Coast Guard District 9: 216-902-6073 | As soon as there is knowledge of the spill. | Report oil spills into or upon the navigable waters of the United States or adjoining shorelines. Reportable discharges of oil include quantities that:
  - Violate applicable water quality standards
  - Cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines
  - Cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines |
| EPA Regional Office Region V        | 77 West Jackson Blvd, Chicago, IL 60604, 312-353-2000 | Immediate reporting | All spills of 10 pounds or more by weight of PCBs (any concentration greater than 50 ppm)
  - Spills of 1 pound or more by weight of PCBs (i.e., total volume spilled times concentration ≥ 1 pound) are also reportable to the National Response Center |
| Wisconsin Emergency Management      | 1-800-943-0003 | Immediate reporting | All discharges to the environment of a hazardous substance (including petroleum products such as diesel, gasoline, oil) except the following:
  - A discharge of gasoline or another petroleum product that is completely contained on an impervious surface
  - A discharge of gasoline if < 1 gallon is discharged onto a surface that is not impervious or runs off an impervious surface
  - A discharge of a petroleum product other than gasoline if < 5 gallons is discharged onto a surface that is not impervious or runs off an impervious surface
  - A discharge of hazardous substances (e.g., PCBs) specifically listed in 40 CFR 117 or 302 if the amount discharged in any 24-hour period is less than the RQ listed in 40 CFR 117 or 302 (e.g., RQ for PCBs = 1 pound) |
7.5 INCIDENTS REQUIRING NRC NOTIFICATION

If the EC determines that the emergency situation could threaten human health or the environment outside the facility, the PM will be notified and the NRC at 1-800-424-8802 shall be contacted (if applicable). The NRC must be notified for hazardous substance or hazardous material releases that exceed the hazardous substance RQ. Reports to the NRC must include the following information:

- Name and telephone number of the reporter
- Name and address of the facility
- Time and type of incident (for example, release, fire)
- Name and quantity of material(s) involved, to the extent known

7.6 NOTIFICATION TO OSHA

Injuries, accidents, and incidents that require OSHA notification within 8 hours include:

- A death
- A probable death
- The in-patient hospitalization of two or more employees within 8 hours

The following information shall be provided to OSHA within 30 days concerning any accident involving a fatality or hospitalization of two or more employees:

- Name of the work place
- Location of the incident
- Time and date of the incident
- Number of fatalities or hospitalized employees
- Contact person
- Phone number
- Brief description of the incident

The EC shall notify the ESS of the above injuries/illnesses/fatalities as soon as possible. The ESS shall immediately notify the PESM and Tetra Tech’s Director of EHS Services.

7.7 PUBLIC NOTIFICATION

While it is unlikely that the project will experience an emergency requiring evacuation of adjacent properties, such an emergency is possible. If it occurs, the PM with assistance from the EC will work with Tetra Tech’s Public Information Officer and the regulatory agencies to determine the appropriate actions. The EC will implement the evacuation. The Public Information Officer will work with the news media, outside businesses, and company public relations officers to assure the notification of potentially impacted neighbor(s). Responsible risk assessment and prevailing weather conditions will determine which neighbors will be evacuated. Examples of incidents potentially impacting the adjacent public include:

- Fire or explosion
- Large chemical release
8.0 EMERGENCY RESPONSE

8.1 GENERAL

In the event of an incident or emergency the site personnel shall immediately:

- Note the current wind direction, speed, abnormal noise, odors, and observable smoke conditions on site.

- Contact the EC and provide all requested information. Bomb alerts, terrorist actions, or certain other risks may require controlled response or release of information. Site personnel will follow the directions outlined by the EC.

- Promptly notify the EC or designee of the location of any injured or missing personnel. The EC will notify the PM and the ESS of the emergency.

- Keep EC informed of the evacuation status, if required, and any other related information.

- Be prepared to implement all possible directions, including:
  1. Notify additional Tetra Tech contacts, if directed by the EC.
  2. Activate the emergency alarms and appropriate alert status.
  3. Make emergency announcements over the radio (remembering to speak slowly and clearly).
  4. Clear the gate area and entry roadway for exiting site workers and responding emergency vehicles.
  5. Print out and/or assemble list of visitors, truck drivers, and contractors.
  6. Control site and gate access from non-required personnel and the media.
  7. The ACP, in conjunction with the EC, will coordinate an escort for any incoming emergency vehicles directly to the location of the emergency and arrange to unlock gates for alternate evacuation routes, as needed.
  8. Gate control during emergencies may be assigned to a trained employee if additional assistance is needed. The assigned employee must understand this Plan and associated activities (e.g., gate control, emergency alarm/air horn activation, radio announcements, response contacts, and the conditions under which to evacuate).

- The EC will inform site personnel when the emergency situation is terminated and instruct ACP to make an “All Clear” radio announcement for the site.

- OR call 9-1-1 to request assistance for any of the following emergencies:
  1. Medical injuries (heart attack, loss of breathing, electrical burns, chemical inhalation, broken bones, etc.)
  2. Severe fire or explosion
  3. Personnel rescue
  4. Releases of chemicals or wastes
8.2 Medical Emergency and Non-Emergency Response

8.2.1 Emergency Response

Some physical signs/symptoms that require emergency medical treatment and a call to 911 include: chest pain, difficulty breathing, uncontrolled bleeding, bone fracture, loss of consciousness, severe head injury, poisoning, shock, loss of limb, and sudden and prolonged dizziness.

In cases of personal injury at the site, the following response actions shall be undertaken (refer to Figure 8-1):

- The injured employee is discovered and the EC is signaled by the best means available (e.g., air horn, hand signal, voice, or radio) that an injury has occurred.
- The EC will evaluate extent of injuries reported and dispatch first-aid-trained personnel or direct site personnel to contact the emergency response organization for ambulance services if needed, and shall notify the PM and the CM.
- Call 911 for initial employee evaluation and transport to the hospital. A designated Tetra Tech employee shall accompany the injured worker to the hospital. If the incident involves exposure to a hazardous substance (or chemical) the ESS shall provide a copy of the relevant MSDS to travel with the victim to the hospital. Also some decontamination may be required depending on victim's exposure.
- Administer first aid to minimize the injury effects.
- Call WorkCare at 1-800-455-6155 for a triage call/discussion with an Occupational Health Nurse or physician. Mention as soon as possible that the call is regarding an emergency injury. The Occupational Health Nurse will assist the supervisor in determining the best treatment plan.
- Provide the following information to WorkCare:
  - Name of Supervisor calling
  - Phone number
  - Location calling from
  - Name of individual injured and Social Security number
  - Date and type of injury
- During WorkCare off-hours, dial the 800 number and identify yourself. A WorkCare health care representative will call you back shortly. Do not delay treatment while awaiting a return phone call.
- The CM is responsible for making certain that an incident report is completed within 24 hours of the incident and is submitted to the PM and the PESM. The ESS will assist in the incident report preparation. The PESM will distribute the report within Tetra Tech for further review, action, and trending.
Discovery of the Injured Employee

Observer:

Notification:

Co-Worker signals the Supervisor by hand, voice, or radio, who contacts Access Control, who then contacts the Emergency Coordinator (or Acting EC)

Response:

Notify ESS

Offer first aid to victim (as needed)

Meet the ER with MSDS if required

EC directs/calls 911 for ambulance services as needed

EC Arrives

Transport victim to the medical facility

Notify Project Manager

EC Directs Critique and Initiates Reporting to Tetra Tech (and OSHA, if required)

Figure 8-1. Injury or Medical Emergency Flow Chart
8.2.2 Non-Emergency Response

In a non-emergency situation:

- The injured employee is discovered and the EC is signaled by the best means available (e.g., air horn, hand signal, voice, or radio) that an injury has occurred.
- The EC will evaluate extent of injuries reported and dispatch first-aid-trained personnel or direct site personnel to contact the emergency response origination for ambulance services if needed, and shall notify the PM and CM.
- Administer first aid to minimize the injury effects.
- Call WorkCare at 1-800-455-6155 for a triage call/discussion with an Occupational Health Nurse or physician. Mention as soon as possible that the call is regarding an injury. The Occupational Health Nurse will assist the supervisor in determining the best treatment plan.
- Provide the following information to WorkCare:
  - Name of Supervisor calling
  - Phone number
  - Location calling from
  - Name of individual injured and Social Security number
  - Date and type of injury
- During WorkCare off-hours, dial the 800 number and identify yourself. A WorkCare health care representative will call you back shortly. Do not delay treatment while awaiting a return phone call.
- Call the local WorkCare clinic (360-891-4900) to notify that you are bringing an injured worker to the clinic for evaluation.
- You may transport the injured employee to the local clinic in a privately owned vehicle. A designated Tetra Tech employee must accompany the injured worker to the local clinic.
- The CM is responsible for making certain that an incident report is completed within 24 hours of the incident and is submitted to the PM and the PESM. The ESS will assist in the incident report preparation. The PESM will distribute the report within Tetra Tech for further review, action and trending.

8.2.3 After Emergency and Non-Emergency Treatment

After emergency and non-emergency treatment:

- Obtain treatment and medical release records for the injured worker and forward to WorkCare.
- Contact Tetra Tech worker’s compensation carrier (ESIS at 1-866-615-5923) within 24 hours of injury.
- Seek ways to ensure the worker can work, including alternate work.
- Regularly follow up with WorkCare and ESIS case representatives.
8.3 SEVERE WEATHER EVENT OR NATURAL DISASTER
Response to an emergency event caused by severe weather or natural disaster (tornadoes, floods, damaging winds, etc.) shall be carried out under the direction of the EC. The EC shall notify the PM and CM immediately. Refer to Figure 8-2 for a summary of emergency response procedures.

Depending on the nature of the event, emergency response and support services (fire, ambulance, or police) may respond via a priority basis. Hospitals, schools, nursing homes, etc., will receive a higher priority and quicker response. The project site must prepare as if it may not receive any emergency response services for up to three days. Other emergencies will be responded to based on the actual/potential damage(s) or in a similar fashion as a fire, tornado, or earthquake.

All U.S. Weather Service-declared Watch, Warning, or Emergency announcements, emergency alarms, weather or natural conditions shall be promptly relayed to all personnel.

8.4 FIRE OR EXPLOSION
The extent of each employee’s emergency response training shall be factored into the appropriate response activities. Project personnel receive specific emergency response training, including response to fires, explosions, and spills, as part of their introductory and annual review of required training.

If safe to do so, trained project personnel shall use fire extinguishers available on site to control or extinguish a small localized fire; remove or isolate flammable or other hazardous materials that may contribute to the fire; and contain or recover spilled materials. The EC shall assess the hazard associated with the emergency situation and shall determine the appropriate response. The EC’s initial response to an emergency shall be the protection and safety of human health.

The general response to a fire or explosion is as follows (refer to Figure 8-3):

- The discoverer of the fire or explosion shall notify his/her immediate supervisor. The supervisor will then notify the EC. Attempts to extinguish a fire or otherwise respond to the emergency shall then be made if it can be accomplished safely; otherwise, withdraw to the designated assembly area and wait for directions.
- The EC shall notify PM, CM, and other appropriate personnel of the emergency situation and the response needed, which could include verbal instructions or alarm patterns.
- Work in the affected area shall be shut down. Non-essential personnel shall be removed from the affected area.
- A head count of workers will be taken for employee accountability and to determine if any rescue or recovery operations are necessary.
- Established emergency procedures shall be followed if the unit requires evacuation or if personnel require medical treatment.
Observer

Weather Forecast or
Radio Communication is
Received by ACP or
Tetra Tech Personnel

Notify
Project
Manager

Emergency Coordinator
(Acting EC) is Notified

Call “911”

Supervisor is Notified and Will
• Secure Equipment, Lines and Unanchored Material
• Close Windows and Doors
• Clear Loading and Unloading Area
• Shut Down Equipment as Required

EC Will Direct Personnel to
Seek Shelter if Appropriate

After the Event, EC Will Direct
A Check for Debris or Property Damage

The EC Will Issue an “All Clear”
Re-Entry Directive When the
Site Conditions Are Safe

Appropriate Reporting Will Be
Prepared by the EC. A
Critique of the Incident Will Be
Performed and the Lessons
Learned Will Be Communicated

Figure 8-2. Weather Events and Natural Disasters Emergency Response Flow Chart
Figure 8-3. Fire or Explosion Emergency Flow Chart
• The area where a fire or explosion has occurred will be protected from entry and disturbance to allow for investigations and evaluations to determine if area is safe to return to work.

• After the fire has been extinguished and no further threat to human health exists, the “All Clear” signal shall be given by the EC. Equipment employed during the emergency shall be cleaned, inspected, and placed back into standby status for future use.

8.5 Unauthorized Entry, Trespass or Site Intruders
Site personnel shall report observation of unauthorized entries or trespassing to their supervisor or, if not available, the EC. In the event of vandalism, the person discovering the vandalism shall report it immediately to his/her supervisor. The supervisor shall report the vandalism to the EC, and he shall report it to the PM. The police shall be called to report the damage. The CM with the ESS shall investigate the damages and ensure that the area or equipment is safe to use. If the area or equipment is deemed unsafe, an evaluation shall be made to ensure that personnel on the property are properly protected. The CM or designee shall complete an incident report. Refer to Figure 8-4.

8.6 Bomb Threats or Terrorist Activities
Bomb threats or terrorist activities will be evaluated based on the information collected while yielding maximum protection to the staff. Area-specific evacuation or total evacuation decisions will be evaluated. Refer to Figure 8-5.

The person receiving the bomb threat on the telephone shall:

- Remain calm.
- Listen without interrupting the caller. If possible, keep the caller talking.
- Obtain as much information as possible, for example:
  - When is the bomb going to go off?
  - Where is it located?
  - What kind of bomb?
  - Where is the caller located?
  - How does the caller know about the bomb?
  - What is the caller’s name and address?
- Keep the line open and notify supervision.
- Write down details about the call that can be remembered (sex, estimated age of caller, voice quality, accent, speech impediments, and background noise).

The EC shall:

- Evacuate the facility.
- Direct or call “911.”
- Notify PM and CM.
- Direct employees to immediately evacuate the area.

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- Cooperate with investigators.
- Support the Emergency Response investigation by police and other responding agency personnel as needed.
- Issue an "All Clear" re-entry direction after the emergency response team completes its investigation and communicates that the site is safe and re-entry is appropriate.
Unauthorized Entry or Intruder

Observer Notification:

Response:

Evacuate nonessential personnel

Emergency Coordinator (or Acting EC)

Initiate shutdown procedure for equipment

PM & CM

Call "911"

ER arrives, including police and additional law enforcement

ER provides support to the EC to mitigate the event

Extra persons if possible at fence openings until repairs can be made

After event, all equipment and facilities will be inspected to ensure that there is no damage that affects site safety

Workers follow EC direction to report to another location if the site access is blocked

The EC Conducts a Critique with Interested Parties, Communicates Lessons Learned, and Initiates Appropriate Reporting

Figure 8-4. Unauthorized Entry, Trespass, or Site Intruder Emergency Response Flow Chart
Observer:

**Bomb Threat**

Notification:

Received by Tetra Tech Personnel

Employee Will:
- Remain Calm
- Listen
- Take Notes
- Ask Questions
  - When will this bomb detonate?
  - Where is the bomb located?
  - What kind of bomb is it?
  - Where is the caller?
  - How does he or she know about the bomb?
  - What is the caller's name?

Notify PM

Alert Emergency Coordinator (or Acting EC)

Response:

Evacuate Area

Call "911"

ER Arrives

ER Investigates
EC Supports Investigation

EC Issues Re-Entry Authorization after ER Determines the Site/Facility is Safe for Re-Entry

EC Prepares Reports for Submittal to Client & T Tech PESM

Figure 8-5. Bomb Threat Flow Chart
8.7 Personnel Rescue

Successful personnel rescue relies on prompt notification. At no time should a rescue attempt be made if the rescuer could become in danger himself/herself and at no time shall an employee enter a confined space to attempt a rescue unless specifically approved in an AHA after training and using the appropriate equipment and monitoring requirements. Training must include recognition and anticipation of hazardous areas and situations. Capable and trained site workers under the supervision of the EC and CM can conduct limited rescue of personnel if deemed safe and if approved by this Plan. If not deemed safe, not approved by this Plan, or if additional equipment and resources are necessary, the local fire department will be contacted to provide this assistance. Refer to Figure 8-6.

8.7.1 Confined Space Rescue

No Tetra Tech personnel are currently permitted to enter any confined space on this project. Confined spaces at this site may include, but are not limited to: wastewater treatment storage and process tanks; stormwater and sanitary sewers and manholes; some pits or vaults that could be encountered; and covered roll-off boxes. All work will be engineered to avoid entry into these spaces to conduct the required work. Entry is defined as the act of a person passing through an opening into a confined space whereby any part of the body breaks the plane of the opening. This NO ENTRY policy will be clearly communicated to all persons working on this project. If a person is found to be in a confined space and that person is unable to exit, Tetra Tech will not attempt a rescue. In an emergency involving a confined space, the local fire department will be called upon to provide a confined space rescue.
Observer:

Notification:

Supervisor

Access Control

Clear Area of Nonessential Personnel

EC or (Acting EC)

Notify PM

Response:

EC Issues "All Clear" for Re-Entry Directive

Call "9-1-1"

ER Arrives

Event Managed

EC Initiates Critique and Reporting

Figure 8-6. Other Emergency Response Flow Chart
9.0 CHEMICAL SPILLS, HAZARDOUS WASTE AND MATERIAL RELEASES

A spill is defined as an unanticipated release of a hazardous substance, including oils, to the environment. This includes releases to soil, water, and air. Spills can potentially occur when transporting, storing, or handling hazardous substances. Common hazardous substances anticipated to be handled at the project site include:

- **Gasoline** – project vehicles, generators, portable fuel containers
- **Diesel** – project vehicles and heavy equipment, generators, portable fuel containers
- **Used oil and oil products** – project vehicles and heavy equipment, used oil storage areas
- **Remediation wastes** – sediment and debris containing PCBs that are handled during dredging, pumping, dewatering, staging, and off-site transportation activities

All employees have received hazardous material training and hazardous waste awareness level training for their work place as a portion of their Hazard Communication training. MSDSs are available for the chemicals in the work area and can be found in the ESS’s office. Employees are trained to clean up small spills in accordance with their Hazard Communication training. Refer to Figure 9-1 for a summary of spill/release response procedures.

- Any spill or air emission release, regardless of amount, should be reported immediately to immediate Supervisor. The Supervisor reports the spill or release to the EC and the EC works with the Regulatory Specialist. The Regulatory Specialist assists the EC in determining reportability of the spill, safety concerns for the clean-up crew, and waste disposal. The information reported to the Supervisor and up the chain must include: the location of the spill or release; what was spilled or released; how much was spilled or released and/or the duration of the release; and the receptor for the release (soil, secondary containment, concrete, stormwater, etc.).

- The safe clean-up of spills and releases depends on the material or waste spilled, the amount released, and conditions of the area (hot surfaces, containment, other materials present, ventilation, etc.).

- After notification to their Supervisor, properly trained site personnel will handle “small” spills not requiring additional personnel. In all cases, the ESS must be notified of any spill clean-up in progress in order to ensure and document proper clean-up, notification of personnel, and waste management/disposal.

- If site crews are unable to effectively handle a large spill, such as from transformer failures, large-volume fuel oil spill, oil spill impacting surface waters, etc., the spill will be immediately reportable to the NRC and State as listed in Table 7-3 above.

To prepare for releases of oil (including hydraulic oil), fuel, and other petroleum product spills, spill response materials are located in areas where there are potential points of release such as refueling or active work areas. The spill materials are maintained regularly and provide the basic personal protective equipment (PPE) and spill containment equipment (absorbents, booms, containers, equipment, etc.) for an immediate response. Other appropriate storage locations on site will contain additional spill and emergency response equipment.
Figure 9-1. Hazardous Material or Waste Release Emergency Response Flow Chart
The emergency equipment list for the site is shown in Table 11-1. In the event of a spill, site personnel shall:

- Alert co-workers.
- Inform their supervisor immediately.
- Follow instruction(s) from the EC or designated EC to clear the affected area.
- Stop the release if it can be safely accomplished (upright a leaking drum, shut off a valve or hose, etc.).
- Remove surrounding materials that could be reactive with the released material and review MSDSs and other information as needed to address this issue.
- Use hand tools and absorbent pads, booms, earth, sandbags, sand, kitty litter, and other inert materials to contain, divert, and clean up a spill.
- If the spill reaches or is probable to reach a stormwater runoff system, take measures necessary to intercept this material.
- Place clean-up materials and containment in appropriate containers for safe retention and final disposition.
- Some special spill and material release conditions and appropriate emergency response actions are identified below:
  - Toxic fumes or vapors – If the spill or material release could result in the emission of vapors or fumes that pose a threat to facility personnel or to persons in the surrounding area, evacuation shall be initiated for facility personnel and the people in the affected surrounding area. The EC shall notify the PM and ESS, and contact appropriate outside authorities to request assistance in the evacuation of people in the surrounding area when appropriate. Personnel shall not be allowed in the affected area until the problem has subsided and it is determined that it is safe to re-enter the area. Evacuation is covered further in Section 10.0.
  - Large-quantity spills – Spills that occur are expected to be small and should be contained and controlled by site personnel. However, when external support is required to mitigate or clean up a spill, the EC (or designee) shall mobilize additional response support by contacting the appropriate agencies.

Authorities and agencies shall be appropriately notified of RQ spills or air emissions as directed by the ESS. Internal notification and client notification shall follow the standard prescribed in the Tetra Tech Incident Reporting and Investigation Procedure, EHS 1-7 (Incident Reporting & Investigation).

If work operations are stopped in response to a release, fire, or explosion, personnel shall monitor for leaks, pressure buildup, or other equipment failures. If an abnormal condition is observed, appropriate action shall be taken by operations personnel to terminate or minimize the amount of material being released. After the emergency, arrangements shall be made for the safe treatment, storage, or disposal of recovered waste, contaminated soil, surface water, or other contaminated material resulting from the emergency. The EC shall notify the PM and ESS and
oversee the management and handling of contaminated materials, which shall include the following:

- Identification of released materials to assure that they are compatible with other stored materials and with the containers or tanks in which they shall be stored
- Clean-up, packaging, characterization, and labeling of the material
- Storage of the material
- Proper treatment or disposal of the material (in permitted facilities)

If the ESS determines that contaminated water, materials, or soil is to be sent off site for treatment and disposal, only EPA-approved and permitted facilities, which are also Tetra Tech approved, shall be used. Methods used to store and treat released materials due to an emergency shall be determined on a case-by-case basis.
10.0 EMERGENCY EVACUATION AND SHELTER

Small or limited hazard incidents may not require a complete evacuation. Limited evacuations or shelter in place procedures may require that only adjacent work areas evacuate to their designated assembly area. Depending on the situation, shelter in place procedures may be utilized to prevent exposure to transient outside contaminants. This may include closing windows, loading bays and doors. Proper considerations are needed prior to turning off any ventilation systems.

The assembly points must not be at risk or involved in the emergency situation. If the assembly points are at risk, supervisors shall direct personnel to proceed to an alternate location and inform the EC.

During an emergency, protective actions that may be taken to ensure worker safety include evacuation or shelter. In some instances, evacuation may be limited to evacuation of a particular work area or crew only; in other instances, evacuation of the site may be necessary.

The Project Site Evacuation Area for all emergencies that require full site evacuation will be field determined based upon the locations they are working. All site personnel and visitors will be informed of the Project Site Evacuation Area during site-specific training. The Site Evacuation Area is the most commonly known location by all personnel and visible to incoming emergency response crews. The distance away from most hazards and typical prevailing winds should protect the Evacuation Area. If a site evacuation is announced and the Evacuation Area is at risk, supervisors will instruct personnel to proceed to an alternate evacuation area as designated by the EC. In the event that a particular work area must be evacuated in an emergency, but that emergency does not affect the entire site, there are designated Assembly Points to which workers will evacuate. The workers who evacuate a work area will, unless otherwise instructed, proceed to the main Assembly Point and await further instruction. A head count will be done at the main Assembly Point before proceeding to the Evacuation Area. Other intermediate Assembly Points may be designated on individual AHAs along with instructions, including alternate evacuation routes, in the event of an emergency, as needed. For each of the facilities established, a map will be developed and posted that shows the main site Assembly Point, main Evacuation Area, and Evacuation Routes.

In the event of a severe weather event (e.g., lightning, tornado), personnel will be alerted where to take shelter. Workers will be informed using word-of-mouth and two-way radios. Supervisors and the EC will perform an accountability check of on-site personnel.

In the event that all personnel cannot be accounted for, the EC will take appropriate actions, including searching for missing personnel. Any search or recovery plans shall include contingency planning to ensure safety of personnel. If necessary, 9-1-1 may be contacted for situations where an incident is deemed unsafe (e.g., fire, earthquake-damaged building, or structure collapse).

The EC evacuates the project work area whenever it is believed that the health and welfare of personnel in the area are being threatened due to chemical release(s), fire, or a natural disaster, such as a tornado. In the event that the EC determines that evacuation of personnel is required, the following actions are taken:

- An air horn blast shall be sounded (5 – 10 seconds) by EC and by supervisory personnel in major work areas. Air horns are located at ACS and at control/support zones of each
major work area. The evacuation signal shall be repeated every 15 – 20 seconds until site personnel start to respond. Further instructions shall be broadcast over the internal site work area via two-way radios and by word-of-mouth. For those areas of the facility where the air horn cannot be heard, supervisors will monitor radios and advise personnel in their area of any emergency.

- Personnel in work areas being evacuated should safely stop work operations, place equipment/tools in a safe shutdown condition, and immediately proceed to their respective assembly point. Directions for alternate routes of evacuation and assembly shall be broadcast over the internal, work area radio frequency or by word-of-mouth, as necessary, or if the designated assembly point or evacuation routes to the evacuation area are deemed unsafe.
- The crew/area supervisor will conduct an attendance check at that time for personnel under his/her direction. Any discrepancy in number or identity of personnel will immediately be conveyed to EC.
- After this initial attendance check, personnel will proceed directly to the main plant Evacuation Area.
- The EC, using the day’s Site Access Log and daily sign-in briefing sheet as an accountability roster, will then perform a follow-up accountability check. Unaccounted-for personnel will be reported to the EC. The EC shall attempt to reconcile the accountability check.
- During an evacuation, attempts shall be made to locate unaccounted personnel as long as such attempts do not endanger the lives of others by re-entry into the emergency area.
- Personnel who are assigned to look for unaccounted personnel or perform limited emergency response duties will be designated by the EC.
- Personnel without specific emergency response assignments shall remain in their designated assembly areas.
- General re-entry into the work area shall be allowed only after the EC announces “all clear” and provides re-entry instructions.
- If necessitated by the emergency event, personnel will be notified by radio or word-of-mouth to “shelter.” Personnel will move to or stay within designated areas for an accountability check.

During a “shelter” event, attempts shall be made to locate unaccounted personnel as long as such attempts do not endanger the life of others.
11.0 ESSENTIAL EMERGENCY EQUIPMENT AND SUPPLIES

A supply of dedicated or easily accessible emergency equipment is maintained on site for response to a variety of minor emergencies including spills and releases, fires, explosions, and injuries. Supplies include: portable fire extinguishers and equipment; spill response materials; tools and support materials; PPE; alarm and communication equipment; and decontamination equipment. This equipment shall be maintained at the site for use in emergencies. Tetra Tech has established accounts with local vendors to support immediate replenishment of depleted supplies.

In addition to dedicated emergency equipment that is stored on site and available for use in an emergency, active work areas as well as areas where oil or fuel is handled or stored have emergency equipment such as fire extinguishers and oil spill kits or materials staged for use. Fire extinguishers are located in work areas and flammable material storage areas in accordance with National Fire Protection Association (NFPA) requirements. These kits and equipment are inspected regularly. Some emergency equipment is dedicated for emergency response, meaning it is not available for use in routine work operations; some emergency response equipment (e.g., water truck) is in use during work but in an emergency can be made available for use. Due to the nature of work at the site, active work locations often change. New work areas are evaluated for the type and quantity of emergency response equipment that must be located, and the necessary equipment is then staged conspicuously and inspected regularly.

Table 11-1 lists the examples types of emergency equipment maintained on site in accordance with EPA, OSHA, and WDNR requirements, which are briefly described in the following sections. This table will be revised and amended as appropriate during site activities. The list includes a description of the equipment, its location, and its capabilities. The following sections discuss the basic types of emergency equipment available. A map depicting the location of emergency spill response equipment will be developed for both the former Shell site and the other upland facility.

11.1 SPILL CONTAINMENT AND CLEAN-UP

Various chemical and oil spill containment materials, such as absorbent booms, socks, pads, and kitty litter, as well as tools and equipment are available for use in cleaning up small spills of hazardous materials, substances, and wastes known to be present on site. Spill kits are located in areas where oil and petroleum products are stored, on all boats > 25 feet, and in hazardous waste storage areas. Additionally, spill kits are staged in various areas on site where active work is being performed. The spill kit locations change as work locations change. Examples of this type of equipment are provided in Table 11-1.

11.2 PERSONAL PROTECTIVE EQUIPMENT

PPE use is addressed in detail in the SHSP. PPE is designed to provide physical and chemical barriers for the head, body, hands, feet, and respiratory protection. PPE is maintained to respond to anticipated chemical releases on site and for use in work areas where a higher level of protection is necessary based on site conditions (dusts, work with chemicals, etc.). Examples of this type of equipment are provided in Table 11-1.
11.3 **Emergency Eyewash/Shower and Decontamination**

Emergency eyewash units and emergency showers will be located in specific work areas in accordance with OSHA standards as necessary based on need. Specific AHA's for those activities/areas identify the need for staging these items. All units must be accessible and operational. Emergency eyewash units and showers will be used to decontaminate personnel in the event of chemical exposure. Additionally, other materials are available for the setup and staging for decontamination (personnel and equipment) in the event that it is necessary.

11.4 **Fire Extinguishers and Equipment**

Portable fire extinguishers are located in active work areas and hazardous material storage areas that contain flammable materials, including hazardous wastes, in accordance with NFPA and OSHA standards. Additionally, heavy mobile equipment (i.e., excavators, dozers) carry portable fire extinguishers. Additional fire extinguishers of several types are available and on hand at Supply and Supply Storage in the event of a small fire on site. The type of fire extinguisher used for fire fighting depends on the type of material (i.e., ordinary combustibles, oil or grease, combustible metal, or energized equipment). If performing hot work, a 20-lb. or larger dry chemical extinguisher will be present in the hot work area and a fire watch will be provided for a minimum of 30 minutes after completion of the hot work.

11.5 **Confined Space Entry and Rescue Equipment**

No persons are presently allowed to enter a confined space on this project. Should a person not adhere to the site rules on confined spaces and be unable to get out of a confined space, the local fire department provides the only on-site confined space rescue support using its own equipment.

11.6 **Personnel Fall Protection Rescue Equipment**

Personnel fall protection rescue equipment, including ladders, harnesses, lifelines, and retrieval systems, are routinely used, available, and stored on site. All rescues must be planned, coordinated, and directed by the EC; however, the local fire department provides the primary rescue support such as high angle rescue, live electrical, or structure collapse.

11.7 **Weather Information and Tracking**

Local weather conditions will affect the drift and dispersion of chemical releases or smoke. The proximity to buildings and equipment will affect immediate area wind patterns and turbulence. Steam release, smoke, flags, survey tape, or blowing leaves can help determine the direction of the wind. The National Weather Service Website will be routinely checked to determine wind speed, direction, rainfall, or severe weather hazards expected.
<table>
<thead>
<tr>
<th><strong>GEAR</strong></th>
<th><strong>EXAMPLES OF EQUIPMENT TYPES</strong></th>
<th><strong>USE &amp; CAPABILITY</strong></th>
<th><strong>LIMITATIONS</strong></th>
<th><strong>LOCATIONS</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Personal Protective Equipment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Body Protection – Outer Wear</td>
<td>Dupont Nexgen Coverall NG 122S 002500 (various sizes) or equivalent</td>
<td>Spills of Gasoline (less than 5 gallon), Diesel, Used oil, Hydraulic fluid, PCBs</td>
<td>Permeable to liquids and vapors; intended for protection from contact with soil, dusts, and light, incidental contact with the materials listed or contact with contaminated soils; Health &amp; Safety to determine adequacy of this ensemble at the time of response.</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Body Protection – Inner Liner with Outer Wear Above</td>
<td>Dupont Tyvek, polypropylene 543253, 543254, 543255 or equivalent (various sizes)</td>
<td>Use as inner layer</td>
<td>Permeable to liquids and vapors; intended for protection from contact with soil, dusts, and light, incidental contact with the materials listed or contact with contaminated soils; Health &amp; Safety to determine adequacy of this ensemble at the time of response.</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Body Protection – Outer Wear</td>
<td>Dupont Saranex 44428 (various sizes) or equivalent</td>
<td>PCB spill response</td>
<td>Impermeable ensemble – presents potential heat stress concerns. Must be inspected prior to and during use for evidence of cuts, abrasions, or other wear that may affect permeability.</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Body Protection – From Flame or Torch Weld</td>
<td>Flame-Retardant Coveralls. Orange jumpsuits or equivalent</td>
<td>Torch cutting or spot welding</td>
<td>Does not offer chemical protection</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Hand Protection – Chemical</td>
<td>N-Dex Nitrile Gloves or equivalent</td>
<td>Gasoline, Diesel, Used oil, Hydraulic fluid, PCBs</td>
<td>No limitations for expected on-site materials</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Hand Protection – Chemical</td>
<td>Ansell Sol-vex 37-175, CE0493 or equivalent</td>
<td>Gasoline, Diesel, Used oil, Hydraulic fluid, PCBs</td>
<td>No limitations for expected on-site materials</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Hand Protection – Chemical</td>
<td>PVC Rubber Industrial Work Gloves – Posigrip RN78477 or equivalent</td>
<td>Gasoline, Diesel, Used oil, Hydraulic fluid, PCBs</td>
<td>Not suitable for gross clean-up of gasoline – use of nitrile glove for gasoline is recommended.</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Respiratory Protection – air-purifying respirator</td>
<td>North 76008A Full face, negative pressure (various sizes) or equivalent</td>
<td>Used in areas with respiratory hazards. Provides eye protection</td>
<td>Not for use in an Immediately Dangerous to Life or Health (IDLH) or oxygen-deficient environment, requires fit test and medical clearance. Must be used with appropriate cartridge. Not for use for potential exposure above the Protection Factor of 50.</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Respiratory Protection – air-purifying</td>
<td>North 770030S Half mask, negative pressure (various sizes) or equivalent</td>
<td>Used in areas with respiratory hazards.</td>
<td>Not for use in an IDLH or oxygen deficient environment, requires fit test and medical clearance. Must be used with appropriate cartridge. Not for use</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
</tbody>
</table>

Contingency Plan
Lower Fox River Remedial Design
June 2008
<table>
<thead>
<tr>
<th>GEAR</th>
<th>EXAMPLES OF EQUIPMENT TYPES</th>
<th>USE &amp; CAPABILITY</th>
<th>LIMITATIONS</th>
<th>LOCATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>respirator</td>
<td>North 7583P100 HEPA / Organic stack (negative pressure respirator) or equivalent</td>
<td>Respirable dusts, diesel, gasoline, solvent, PCBs</td>
<td>Not for use in an IDLH environment</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Respiratory Protection -- Cartridges</td>
<td>North 7580P100 HEPA (negative pressure respirator) or equivalent</td>
<td>Respirable dusts</td>
<td>Not for use in an IDLH environment</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Respiratory Protection -- Cartridges</td>
<td>3M R012 PAPR HEPA or equivalent</td>
<td>Respirable dusts, PCBs</td>
<td>Not for use in an IDLH environment</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Rain or Splash Suits</td>
<td>Lacrosse PVC / poly (size L, XL, 2X, 3X) or equivalent</td>
<td>Outdoor rain protection, diesel or gasoline splash</td>
<td>Not to be worn without Tyvek or Saranex layer underneath suit in areas where Tyvek or Saranex is required</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Foot Protection -- Work boots</td>
<td>Ranger Rubber boot (steel toe and shank) [size 6-15] or equivalent</td>
<td>Gasoline, Diesel, Used oil, Hydraulic fluid, PCBs</td>
<td>May require disposal if not properly decontaminated or if not wearing over-booties to protect the primary boot; primary example – PCB clean-up</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Foot Protection - Overshoes</td>
<td>M-Wear Disposable yellow rubber boot covers, slip-on, natural rubber or equivalent</td>
<td>PC1B s – primary use; also for gasoline, diesel, and used oil</td>
<td>May degrade if extended contact occurs with gasoline, diesel, used oil, hydraulic fluid</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Eye Protection - Goggles</td>
<td>American All Safe Company 2-11 Monogoggle or equivalent</td>
<td>Offers some protection from splashes to eyes and flying debris to eyes</td>
<td>Fogs up easily. Should be used in conjunction with face shield for maximum protection</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Eye Protection - Face Shields</td>
<td>Bullard 840MG Flat Acetate Shield or equivalent</td>
<td>Helps protect against splash hazards and flying debris</td>
<td>Should be worn with protective eyewear or goggles for maximum protection</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Spill Clean-up Materials</td>
<td>Sorbent Products, Inc. ENV810 Polypropylene Boom 8’ X 10’ or equivalent</td>
<td>Oil spills on water, floats</td>
<td>Use limited to oil. Does not absorb other liquids. Does not offer complete protection for blocking drains unless used with other material to dike, but helps</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Sorbent Pads</td>
<td>Absorbent pads 16” X 20”, SPC100, 954570 or equivalent</td>
<td>Oil and grease spills on land or on puddles</td>
<td>Use limited to oil. Does not absorb other liquids. Good for small spill clean-ups only</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Sorbent Granular</td>
<td>NAPA Diatomite, Kitty Litter, or equivalent</td>
<td>Oil, grease, water and other liquids – absorbs well and can be placed easily over large area</td>
<td>Not to be used for spills in water or in puddles – soaks up water, sinks</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
<tr>
<td>Sorbent Socks</td>
<td>Moltan Sock Absorber or Equivalent</td>
<td>Oil spill on land</td>
<td>Oil (including PCB oil) only.</td>
<td>Supply Conex near Tetra Tech field office</td>
</tr>
</tbody>
</table>

Contingency Plan
Lower Fox River Remedial Design

June 2008
<table>
<thead>
<tr>
<th>GEAR</th>
<th>EXAMPLES OF EQUIPMENT TYPES</th>
<th>USE &amp; CAPABILITY</th>
<th>LIMITATIONS</th>
<th>LOCATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alarm Systems and Emergency Communications</td>
<td></td>
<td></td>
<td></td>
<td>Tetra Tech field office</td>
</tr>
<tr>
<td>Emergency Notification – Employees, On Site</td>
<td>Site Radios</td>
<td>Notification and Communication</td>
<td>May not work well at opposite ends of the site or in some buildings</td>
<td>ACS, PM, CM, ESS, Operator and labor crew teams (1 per team min.)</td>
</tr>
<tr>
<td>Emergency Notification – Off Site/On Site</td>
<td>Cellular Phones</td>
<td>Notification and Communication</td>
<td>Limited to use at Access Control and Supervisory Personnel</td>
<td>ACS, PM, CM, ESS</td>
</tr>
<tr>
<td>Emergency Notification – Localized areas on site</td>
<td>Air Horns</td>
<td>Notification and Warning System for Evacuation</td>
<td>Localized Use, can't reach all areas of the site, vehicle horns to be used in lieu of air horns if the air horns are not available</td>
<td>ACS, CM, ESS, 1 per team</td>
</tr>
<tr>
<td>Fire Extinguishing Systems</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fire Extinguishers – Portable</td>
<td>Dry Chem, Purple-K, Type ABC</td>
<td>Class A (ordinary materials), class B (oils and grease), class C (energized electrical fire)</td>
<td>Not for use on Class D metal fires. Limited size of fire they can be used on and incipient stage only</td>
<td>Active Work Areas, Building 428, Office, and Supply Conex (CM will maintain list of locations and inspections)</td>
</tr>
<tr>
<td>Fire Extinguishers – Portable</td>
<td>Type A Water Filled</td>
<td>Class A (ordinary materials)</td>
<td>Not for use on class B, C, or D fires</td>
<td>Active work areas on site (CM will maintain list of locations and inspections)</td>
</tr>
<tr>
<td>Decontamination Equipment</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Equipment Decon (and Spill Response) – Support Equipment</td>
<td>Polyethylene bags, 6-mil, large size</td>
<td>For use in containerizing spill clean-up materials and used PPE waste from spill or from decon</td>
<td>Weight limit. Not for use with liquids or sharp objects that can pierce the bag. Some waste bags may require additional containerization after clean-up depending on the material.</td>
<td>Supply Conex near Tetra Tech field office and Building 428</td>
</tr>
<tr>
<td>Personnel Decon – Eyewash</td>
<td>Portable eyewash stations</td>
<td>Flushing of eyes in case of contact with chemical or splash of chemical</td>
<td>Must be cleaned and inspected on routine schedule. Emergency use may require assistance of second person.</td>
<td>Active work locations where chemical hazards</td>
</tr>
</tbody>
</table>
### Table 11-1. List of Emergency Response and Decontamination Equipment on Site

<table>
<thead>
<tr>
<th>GEAR</th>
<th>EXAMPLES OF EQUIPMENT TYPES</th>
<th>USE &amp; CAPABILITY</th>
<th>LIMITATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equipment Decon – Support</td>
<td>Kiddie Pool</td>
<td>For use as boot wash or personnel decontamination, or as secondary containment.</td>
<td>Limited size. Plastic. Can break easily. Set on hard even surface.</td>
</tr>
<tr>
<td>Equipment Decon – Support</td>
<td>Scrub Brush</td>
<td>For use in boot wash or personnel or small equipment decontamination.</td>
<td>N/A</td>
</tr>
<tr>
<td>Equipment Decon – Support</td>
<td>Detergent</td>
<td>For use in boot wash or personnel or small equipment decontamination.</td>
<td>N/A</td>
</tr>
<tr>
<td>Personnel Decon – Showers</td>
<td>Shower stations</td>
<td>Removal of chemicals on clothing and skin in emergency.</td>
<td>Personnel decontamination facility will be located in the Processing Plant. Person must be transferred to this building to take shower.</td>
</tr>
<tr>
<td>Monitoring Equipment</td>
<td>Monitoring Equipment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hazardous Atmosphere</td>
<td>RAE Systems Photo-ionization</td>
<td>Indication of relative organic vapor concentration for spills involving fuels.</td>
<td>Will not measure methane; unable to identify specific compounds.</td>
</tr>
<tr>
<td>Hazardous Atmosphere</td>
<td>MSA Solaris 10047228 O₂, LEL,</td>
<td>Low oxygen concentrations can result in erroneous flammability / explosivity readings</td>
<td>Monitoring for oxygen level; lower explosive limit (flammability of vapor — e.g., from fuel spills, measure oxygen in ambient air; carbon monoxide (from events involving combustion),</td>
</tr>
<tr>
<td>Hazardous Atmosphere</td>
<td>RKI Instruments O₂, LEL, H₂S,</td>
<td>Monitoring for oxygen level; lower explosive limit (flammability); hydrogen sulfide; carbon monoxide (from events involving combustion),</td>
<td>Low oxygen concentrations can result in erroneous flammability / explosivity readings</td>
</tr>
<tr>
<td>Tablet PC</td>
<td>RAE Systems Photo-ionization</td>
<td>Indication of relative organic vapor concentration for spills involving fuels.</td>
<td>Will not measure methane; unable to identify specific compounds.</td>
</tr>
<tr>
<td>Hazardous Atmosphere</td>
<td>MSA Solaris 10047228 O₂, LEL,</td>
<td>Low oxygen concentrations can result in erroneous flammability / explosivity readings</td>
<td>Monitoring for oxygen level; lower explosive limit (flammability of vapor — e.g., from fuel spills, measure oxygen in ambient air; carbon monoxide (from events involving combustion),</td>
</tr>
<tr>
<td>Hazardous Atmosphere</td>
<td>RKI Instruments O₂, LEL, H₂S,</td>
<td>Monitoring for oxygen level; lower explosive limit (flammability); hydrogen sulfide; carbon monoxide (from events involving combustion),</td>
<td>Low oxygen concentrations can result in erroneous flammability / explosivity readings</td>
</tr>
</tbody>
</table>

**Notes:**
Locations of spill kits for use on small petroleum spills (diesel, gasoline, hydraulic fluid, etc.) are subject to change in response to the daily schedule and crew locations. Typical contents of these small spill kits are listed below. Those items shown in italics are supplied in spill kits where warranted due to potential chemical hazards in that area.

**Typical Contents:**
- 2 face shields
- 10 oil absorbent towels
- 1 bag absorbent (granular, dehydrated clay)
- 1 plastic shovel
- 1 roll of Caution Tape
- 1 boom – absorbent for acids, caustics, and solvents

**Contents (cont.):**
- 1 boom – water, grease solvent
- 4 Ansell Solvex gloves
- 2 Tyvek suits (size 3X)
- 1 roll duct tape
- 2 Saranex Suits
- 2 pair rubber overshoes
12.0 POST-EMERGENCY EQUIPMENT MAINTENANCE

After an emergency, the equipment used during the event shall be cleaned or replaced, readied, and inspected for its intended use before operations are resumed in the affected areas of the facility. The type of cleaning, maintenance, or replacement necessary shall be determined on a case-by-case basis. Primarily, cleaning shall consist of wiping off equipment with disposable cloths until no residual waste material can be seen or flushing with an appropriate solvent (normally water) until clean. If a solvent other than water is used, a water flush may follow. Should sampling be necessary to ensure residues are removed; a sample of the solvent rinse water shall be collected and analyzed. Analytical parameters shall be based on process knowledge of the materials and equipment involved.

Fire extinguishers are refilled and depleted stocks of neutralizing materials, protective clothing, and safety equipment are refilled, replenished, and cleaned as necessary to be readied for future service. The ESS is responsible for inspecting the supply of emergency equipment and the CM is responsible for assuring that adequate supply is maintained. Operations shall resume after post-emergency critical equipment maintenance has been performed.
13.0 ASSESSMENT, REPORTING, CRITIQUE AND FEEDBACK

Once an emergency situation is brought under control, a full review of the incident is conducted to determine the course of action necessary to remedy the effects and to prevent event recurrence. It is the responsibility of the EC to convene a meeting of the emergency participants within seven working days. The PM or designee shall invite the client and local emergency response agencies to provide input and to participate in a detailed evaluation.

The critique shall review:

- Overall strategy and tactics employed
- Effectiveness of response elements
- Successful operations and identification of problems
- Establishment of root cause or plan or procedure failure(s)
- Review of lessons learned
- Suggestion of improvements and amendments to the Plan and the SHSP
- Conclusion with the communication of lessons-learned information to Tetra Tech personnel

The EC shall prepare a written summary of the critique and assessment within 30 days of the incident. The PM shall distribute the written summary to the client. The client may forward copies of the written summary to local emergency response agencies.

Needed corrective actions shall be entered into the project’s non-conformance tracking system and shall be scheduled and tracked through closure.

Changes made to the Plan as a result of the critique and lessons learned shall be documented and communicated to site personnel.
14.0 DOCUMENTS AND RECORDS

The emergency management program shall be documented to demonstrate conformance with the requirements of this Plan. Project records are maintained in a formal document control system.

Emergency readiness assurance shall include assessments and documentation to ensure that stated emergency capabilities are sufficient to implement this Plan.

Program documentation includes the following:

- Emergency drill records
- Incident reports, critiques, and corrective action reports
- External reports for emergency incidents
- Plan revision records
APPENDIX B
FIRE DEPARTMENT LOCATION MAPS
Address 501 S Washington St
Green Bay, WI 54301

Notes
Green Bay, WI Fire Department / EMS
Operable Unit 5 Location

Address 961 Broadway St
Wrightstown, WI 54180

Notes Wrightstown, WI Fire Department / EMS
Operable Unit 2 Northern Location

http://maps.google.com/maps?q=961+Broadway++ST,wrightstown,WI,54180&ie=UTF8... 4/17/2008
Address 206 W 3rd St
Kaukauna, WI 54130

Notes KauKauna Fire Department / EM:
South Operable Unit 2 Location

ATTACHMENT C
Monthly Storage Area Inspection Form
**ATTACHMENT C**

**Monthly Fuel Storage Area Inspection Checklist**

Further description and comments, if needed, should be provided on a separate paper and attached to this sheet. Any item answered “YES” needs to be promptly reported, repaired or replaced. Records are maintained with the SPCC Plan at the Irvin Peeters Site Staging facility.

Date: ____________________  Signature: ____________________

<table>
<thead>
<tr>
<th>Conditions</th>
<th>Yes</th>
<th>No</th>
<th>Description and Comments (Note Tank Type and Location)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tank surfaces show signs of leakage</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tanks show signs of damage, rust or deterioration</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vents are obstructed</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tank area clear of trash and vegetation</td>
<td></td>
<td></td>
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<tr>
<td>Equipment protectors, labels, or signs are missing</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Loading/unloading lines are damaged or deteriorated</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Secondary containment is damaged, stained or contains water</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interstitial monitoring (1,000 diesel tank) shows a change in steady-state conditions, indicative of a potential leak</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spill kit material is missing, damaged or needs replacement</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fire extinguishers are missing</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>