EMERGENCY RESPONSE PLAN

WEST LAKE LANDFILL SUPERFUND SITE OPERABLE UNIT-1

Prepared For:

The United States Environmental Protection Agency Region VII



Prepared on Behalf of:

The West Lake Landfill OU-1 Respondents

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List of Acronyms

ACRONYM	Definition	ACRONYM	Definition
ASA0C	Administrative Settlement Agreement and Order of Consent	OEM	St. Louis County Office of Emergency Management
BMP	Best Management Practices	OU	Operable Unit
CFR	Code of Federal Regulations	PPE	Personal Protective Equipment
DoH	St. Louis County Department of Health	RA	Remedial Action
EPA	U.S. Environmental Protection Agency	RD	Remedial Design
ERP	Emergency Response Plan	RI	Remedial Investigation
FS	Feasibility Study	RIM	Radiologically Impacted Material
GERT	General Employee Radiation Training	ROD	Record of Decision
HAZWOPER	Hazardous Waste Operations and Emergency Response	SPCC	Spill Prevention, Control, and Countermeasures
IMP	Incident Management Plan	SOW	Statement of Work
LEPC	Local Emergency Planning Committee	UAO	Unilateral Administrative Order
MDHSS	Missouri Department of Health and Senior Services	USC	United States Code
MDNR	Missouri Department of Natural Resources	WMP	MDNR Waste Management Program
NCC	Non-Combustible Cover		

Introduction

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

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

This ERP may be revised as necessary during the RD/RA process to reflect changes in site conditions or RD/RA activities.

The ERP is organized is organized as follows:

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

Site Description

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

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

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

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

OU-2 includes those areas where RIM has not been identified. It is comprised of the following areas: a Closed Demolition Landfill in the northeastern portion of the site; an Inactive Sanitary Landfill in the western portion of the site; and a Former Active Sanitary Landfill, also known as Bridgeton Landfill, in the eastern and southern portion of the site. As noted above, waste materials were placed above-grade in the North Quarry portion of Bridgeton Landfill, over the southwestern portion of what is now OU-1 Area 1. In accordance with the

July 25, 2008 Record of Decision (ROD) for OU-2 (EPA 2008), EPA has deferred oversight of the Closed Demolition Landfill and Former Active Sanitary Landfill to the Missouri Department of Natural Resources (MDNR), while EPA remains the lead regulatory agency overseeing the remedy at the Inactive Sanitary Landfill.

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

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

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

Oil Storage

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

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

Emergency Response Roles and Responsibilities

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

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

OU-1 PROJECT COORDINATOR

The OU-1 Project Coordinator has overall responsibility for the implementation of the OU-1 RD/RA. This individual will interface between the EPA and the OU-1 Respondents: Cotter Corporation (N.S.L.) and Bridgeton Landfill, LLC in its own right and as the successor to Rock Road Industries, Inc.

EMERGENCY RESPONSE MANAGER

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

RADIATION SAFETY OFFICER

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

Plan Development and Revisions

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

This ERP has been developed based in part on the current IMP (Bridgeton Landfill 2019) for the larger West Lake Landfill Superfund Site. The IMP was developed pursuant to the UAO (EPA 2015), which required that the facility prepare an IMP for OU-1. The IMP that was eventually prepared incorporated the entirety of the West Lake site, including OU-1, and was based in part on a plan originally developed for the Bridgeton Landfill (CEC 2015).

The IMP was developed in close consultation with local and regulatory authorities, including emergency responders. Since it was first submitted on March 21, 2016, the IMP has been revised multiple times, based on changes to site conditions and activities, and on comments provided by the local and regulatory authorities. The site holds quarterly meetings with the local and regulatory authorities to review site conditions, activities, and incidents from the past quarter (if any). The results of these quarterly IMP review meetings, as well as other feedback, are incorporated into the IMP via plan revisions that are performed at least annually. The most recent IMP revision was issued March 28, 2019.

It is anticipated that the IMP will be revised to reflect the fact that emergency response for OU-1 will be addressed by this ERP once it has been approved and formally adopted. The IMP will continue to address the remainder of the site, including OU-2 and the other structures and facilities. The OU-1 Project Coordinator and/or the OU-1 Emergency Response Manager will still attend the quarterly IMP review meetings when possible, to answer questions and address issues related to emergency response for OU-1.

In addition to EPA Region 7, this ERP will be submitted to the local and regulatory authorities listed on **Table 1**. This ERP may be revised as necessary to reflect comments provided by regulatory and local authorities, including emergency responders. If proposed RD activities could potentially impact the actions of responders during an emergency, then this ERP may be revised accordingly. If additional meetings with local and regulatory authorities are needed as a part of this process, the site will coordinate with the authorities – including the EPA – to plan and schedule those meetings.

Emergency Assessment and Response Strategy

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

Emergency Assessment

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

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

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

- Incoming Call to 911 / EPA Spill Line / MDNR Spill Line
- Personal Injury / Man Down / Personnel Contamination
- Sudden Waste Movement / Exposed Waste
- Surface Fire (Vegetation or Landfill Fire)

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

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

- Level 0 Emergency: An emergency that can be addressed entirely by on-site support personnel and
 equipment, if requested by the Emergency Response Manager. In some cases, notification to local and
 regulatory authorities may be necessary.
- Level 1 Emergency: An emergency that requires the assistance of local authorities to address. May include emergencies with potential to harm the health or safety of on-site personnel.

Emergency Response Strategy

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

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

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

Emergency Notifications

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

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

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

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

HAZARDOUS SUBSTANCE RELEASE

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

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

WASTE MATERIAL RELEASE

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

Emergency Response Infrastructure and Equipment

This section describes site infrastructure and equipment that is pertinent to 0U-1 emergency response activities.

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

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

Site Entrances

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

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

Signage on the primary entrance gates for Area 1 and Area 2 indicates that there is no entry without proper authorization. The primary and secondary gates for Area 1 and Area 2 are kept closed and padlocked when not in use.

In the event of an emergency inside OU-1, any workers present will proceed to the primary entrance, if possible, and exit OU-1. If egress is not possible via the primary entrance, workers will proceed to the nearest secondary entrance and exit OU-1. The locations of the primary and secondary entrances to the larger West Lake Landfill Superfund Site are illustrated on **Figure 5**. Once workers have been evacuated from OU-1, they can be evacuated from the larger West Lake site at these locations, if necessary.

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

Roads

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

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

Fire Hydrants

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

Emergency Communication

In the event of an emergency, individuals will use their personal cell phones or, if needed, personal two-way radios for internal communication within OU-1 or for communication between individuals inside and outside OU-1.

On-Site Emergency Resources

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

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

Radiation Safety During Emergencies

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

Priorities During Emergency Response

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

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

Tyvek coveralls, rubber gloves, and rubber boots are available in the office trailers located just outside the fence lines for OU-1 Area 1 and Area 2. The locations of the Area 1 and Area 2 trailers are illustrated on **Figure 3** and **Figure 4**, respectively. In addition, the OU-1 Radiation Safety Officer should be contacted to coordinate the provision of any additional PPE that may be needed by emergency response personnel who need to enter OU-1.

If entry into OU-1 is necessary to respond to an emergency, emergency responders should contact the Radiation Safety Officer to coordinate appropriate procedures for the frisking and (if necessary) decontamination of personnel and equipment prior to exiting OU-1.

EMERGENCIES REQUIRING AIR MONITORING

If an emergency occurs in OU-1 that involves a potential for the release of radionuclide-containing dust, monitoring data obtained from the OU-1 air monitoring program will be collected and evaluated to assess the potential for a release and any impacts that may have been associated with such a release. These monitoring results will be provided to the EPA. Full details on the OU-1 air monitoring program are presented in the Air Monitoring, Sampling, and QA/QC Plan (Auxier 2014).

EMERGENCIES REQUIRING WATER APPLICATION

If emergency response activities performed in OU-1 involve the application of water that could run off the surface of OU-1 (e.g., the use of water to suppress a vegetation fire), best management practices (BMPs) such as the application of straw wattles will be used to mitigate the potential transport of soil from OU-1 to other areas.

Post-Response Reporting

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

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

- The name, address, and contact information for the site;
- The date, time, category, and severity of the emergency;
- The name and quantity of any hazardous materials released as a result of the emergency, as well as the estimated quantity and disposition of any recovered materials;
- An assessment of any actual or potential hazards to human health or the environment resulting from the emergency; and
- A description of the steps taken to respond to the emergency and to ensure the health and safety of onsite personnel and the public.

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

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

Emergency Response Training

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

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

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

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

References

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

Tables

Table 1 - Emergency Response Roles and Contact Information

OU-1 Emergency Response Roles

	00-1 Emergency Response Roles	
EMERGENCY RESPONSE ROLE	DESIGNATED INDIVIDUAL	CONTACT INFORMATION
OU-1 Project Coordinator	Paul Rosasco - Engineering Management Support, Inc.	Cell: 303-808-7227
Emergency Response Manager	Daniel Feezor - Feezor Engineering, Inc.	Cell: 217-836-8842
Alternate Emergency Response Manager 1	Bill Abernathy - Feezor Engineering, Inc.	Cell: 314-502-1299
Alternate Emergency Response Manager 2	Jon Wilkinson - Feezor Engineering, Inc.	Cell: 636-578-8635
Radiation Safety Officer	Bill Abernathy - Feezor Engineering, Inc.	Cell: 314-502-1299
Alternate Radiation Safety Officer	Jon Wilkinson - Feezor Engineering, Inc.	Cell: 636-578-8635
	Support Contacts	
SUPPORT CONTACT	NAME	CONTACT INFORMATION
Bridgeton Landfill Division Manager	Erin Fanning	Cell: 209-227-9531
Alternate Bridgeton Landfill Contact 1	Mike Lambrich	Cell: 314-683-3921
Alternate Bridgeton Landfill Contact 2	Dana Sincox	Cell: 314-313-0838
Alternate Bridgeton Landfill Contact 3	Matt Stewart	Cell: 314-477-6140
	Regulatory Authorities	
REGULATORY AUTHORITY	NAME	CONTACT INFORMATION
EPA Region 7 - Regional Project Manager	Christine Jump	Office: 913-551-7141
5040 4 7 0 0 0 11 4		Cell: 816-398-1965
EPA Region 7 - On-Scene Coordinator	Tom Mahler	Cell: 816-604-0546
EPA Region 7 - Spill Line	-	913-281-0991
MDNR Waste Management Program - Director	Chris Nagel	Office: 573-751-5401
		Cell 1: 573-680-5146
		Cell 2: 573-690-5371
MDNR Waste Management Program -	Mike Parris	Office: 573-526-3918
Compliance/Enforcement Section		Cell: 573-680-6669
MDNR Department of Health and Senior Services	Keith Henke	Cell: 573-645-8943
MDNR Environmental Emergancy Response - Spill Line	-	573-634-2436
MDNR Environmental Response - St. Louis Region -	Mike Ruddy	Office: 636-938-7809
Route 66		Cell: 314-640-5198
St. Louis County Department of Health	Mark Milward	Office: 314-615-4116
		Cell: 314-520-1373
	Local Authorities	
LOCAL AUTHORITY	NAME	CONTACT INFORMATION
Robertson Fire Department - Assistant Fire Chief	Maynard Howell	Cell: 314-575-5011
Pattonville Fire Department - Battallion Chief	Battallion Chief	Cell: 314-393-4802
(Primary Contact)	2000	0001.000 .001
Pattonville Fire Department (Secondary Contact)	Jim Usry	Cell: 314-393-4807
r accommo i no populatione (cocomacily contact)	J 53.1	Office: 314-739-3118
Bridgeton Police Department (Primary Contact)	Chief Donald Hood	Cell: 314-420-9112
Bridgeton Police Department (Secondary Contact)	Major Mossotti	Cell: 314-602-3632
St. Louis County Office of Emergency Management	Mark Diedrich	Office: 314-615-9500
(OEM) - LEPC Coordinator	main Diculion	011100.017 010-3300
St. Louis County Office of Emergency Management	24/7 Emergency Line	314-615-5360
(OEM) - Bureau of Communications	2-7/ I LINGISCHOY LING	314-013-3300
(Jan) Buroad of Communications		
	Other Contacts	
OTHER CONTACT	NAME	CONTACT INFORMATION
SSM Health DePaul Hospital	-	314-344-6000
SSM Health St. Joseph Hospital - St. Charles	-	636-947-5000
National Response Center	-	800-424-8802

Table 2 - On-Site Emergency Resources

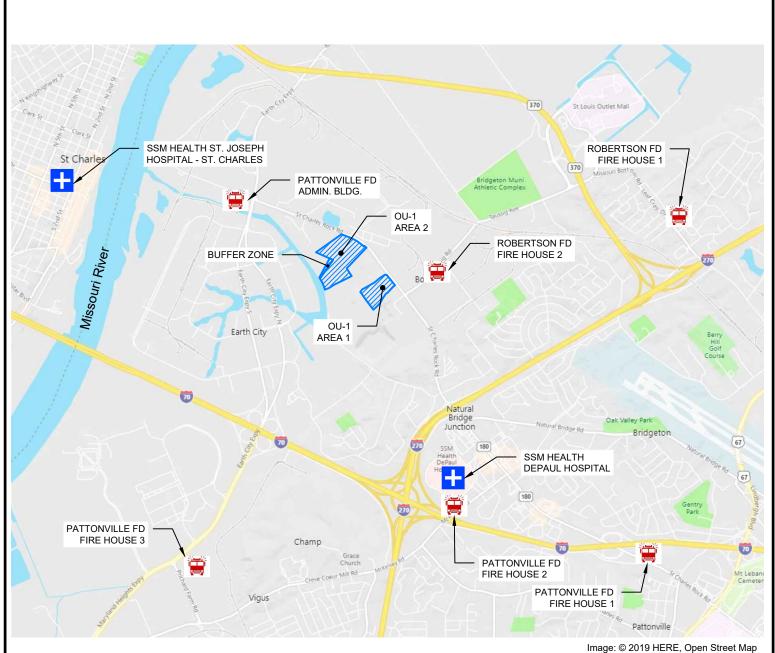
West Lake Superfund Site OU-1 Resources

RESOURCE	QUANTITY
Tyvek Coveralls, Rubber Gloves, Rubber Booties *	100+
Ludlum Model 12 Survey Meter with 44-9 Alpha-Beta-Gamma Detector †	1
Ludlum Model 2360 Data Logger with 43-93 Alpha-Beta Detector †	1
Other Resources‡	
RESOURCE	QUANTITY
Fire Hydrants	4
Soil Stock Pile	10,000 c.y.
Bulldozers	2
Water Truck (3,500-gal. with Cannon)	1
Water Truck Adapter to 5-in. Storz Fitting	1
Excavators	2
Spill Cleanup Kits	18
Eye Wash Stations	8
Portable Fire Extinguishers	66
Knife Gates	18
Vacuum Trucks	1
ATVS (2-Man with Tool Bed)	7
ATVs (4-Man with Tool Bed)	1
UltraRAE 3000 Benzene-Specific Photoionization Detector (PID) Meter	1
RKI GX-2009 Portable 4-Gas Meter	1
RKI GX-6000 Portable 5-Gas Meter with Benzene-Specific PID Meter	1
Class A SFFF (Structural Fire Fighting Foam), 5-gal. Containers	40

Notes

- * Located in OU-1 Area 1 and Area 2 office trailers, just outside OU-1 fence lines.
- † Maintained by Radiation Safety Officer.
- ‡ Resources affiliated with the larger West Lake Landfill Superfund Site (including Bridgeton Landfill). Bridgeton Landfill support contacts can commit these resources during an emergency.

Figures



5000



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



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

Missouri State Certificate Of Authority #: E-200912211

PROJECT WEST LAKE LANDFILL SITE MANAGEMENT PLAN **BRIDGETON, MISSOURI 63044**

MAY 2019 DESIGNED BY: IN APPROVED BY: ---

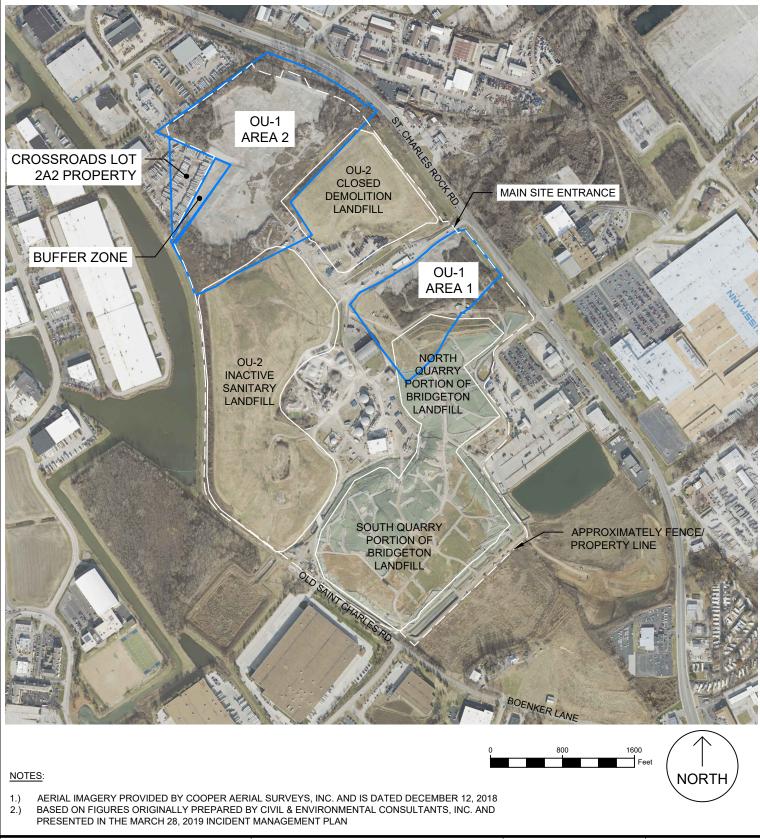
FIGURE 1

NORTH

DRAWING TITLE

SITE LOCATION

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





Missouri State Certificate Of Authority #: E-200912211

PROJECT

WEST LAKE LANDFILL SITE MANAGEMENT PLAN BRIDGETON, MISSOURI 63044

DESIGNED BY: IN

APPROVED BY: ---

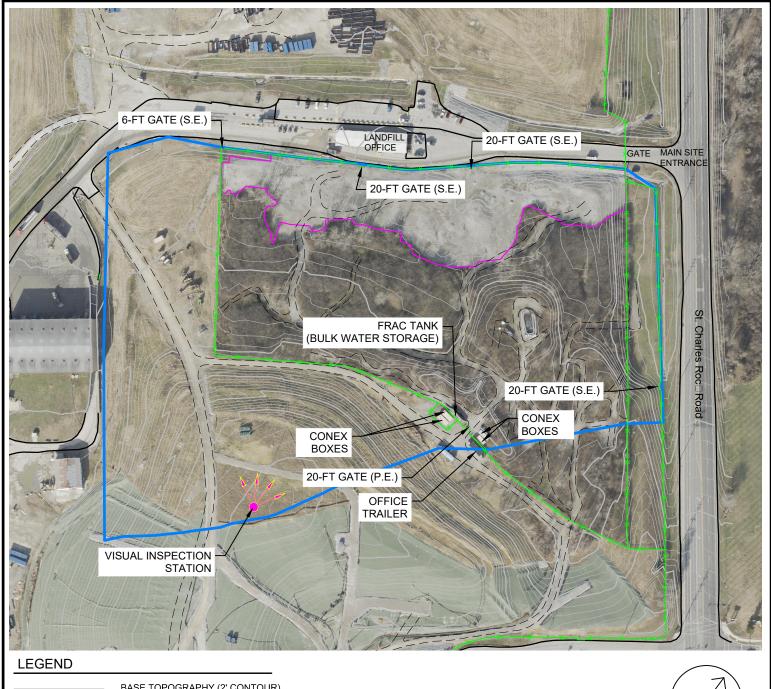
MAY 2019

FIGURE 2

DRAWING TITLE

SITE LAYOUT

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



BASE TOPOGRAPHY (2' CONTOUR)
BASE TOPOGRAPHY (10' CONTOUR)

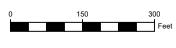
LIMIT OF NON-COMBUSTIBLE COVER

OU-1 AREA 1

FENCE

GRAVEL ROAD

PAVED ROAD





NOTES:

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



PROJECT

WEST LAKE LANDFILL SITE MANAGEMENT PLAN BRIDGETON, MISSOURI 63044 MAY 2019

DESIGNED BY: IN

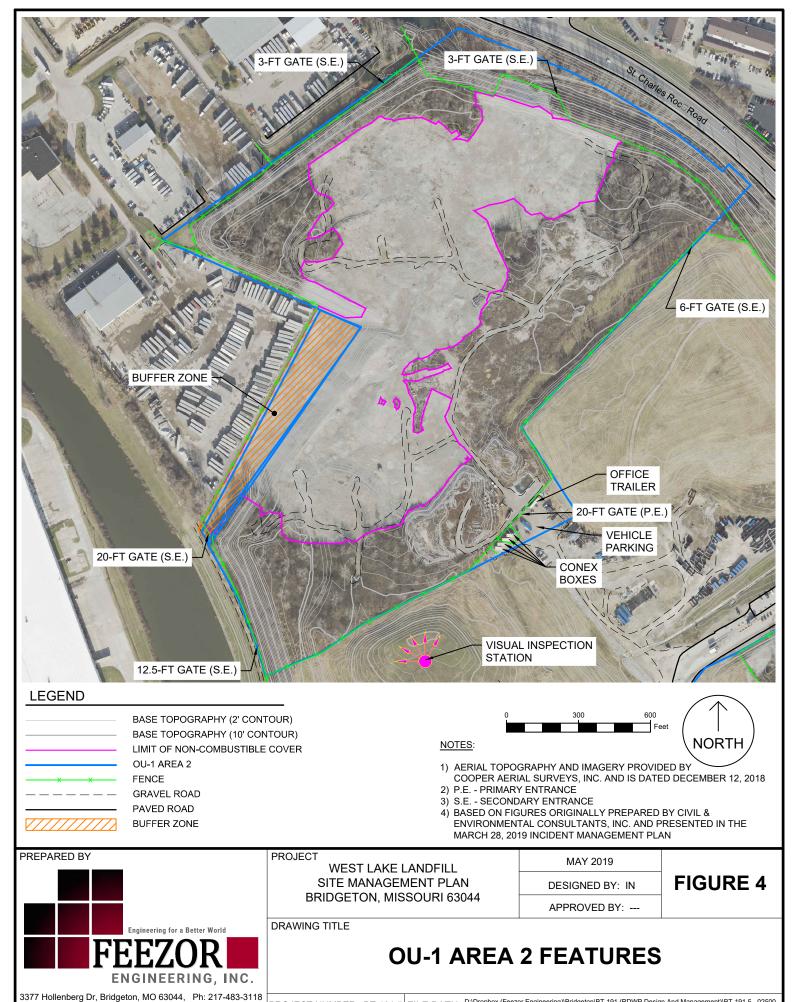
APPROVED BY: ---

FIGURE 3

DRAWING TITLE

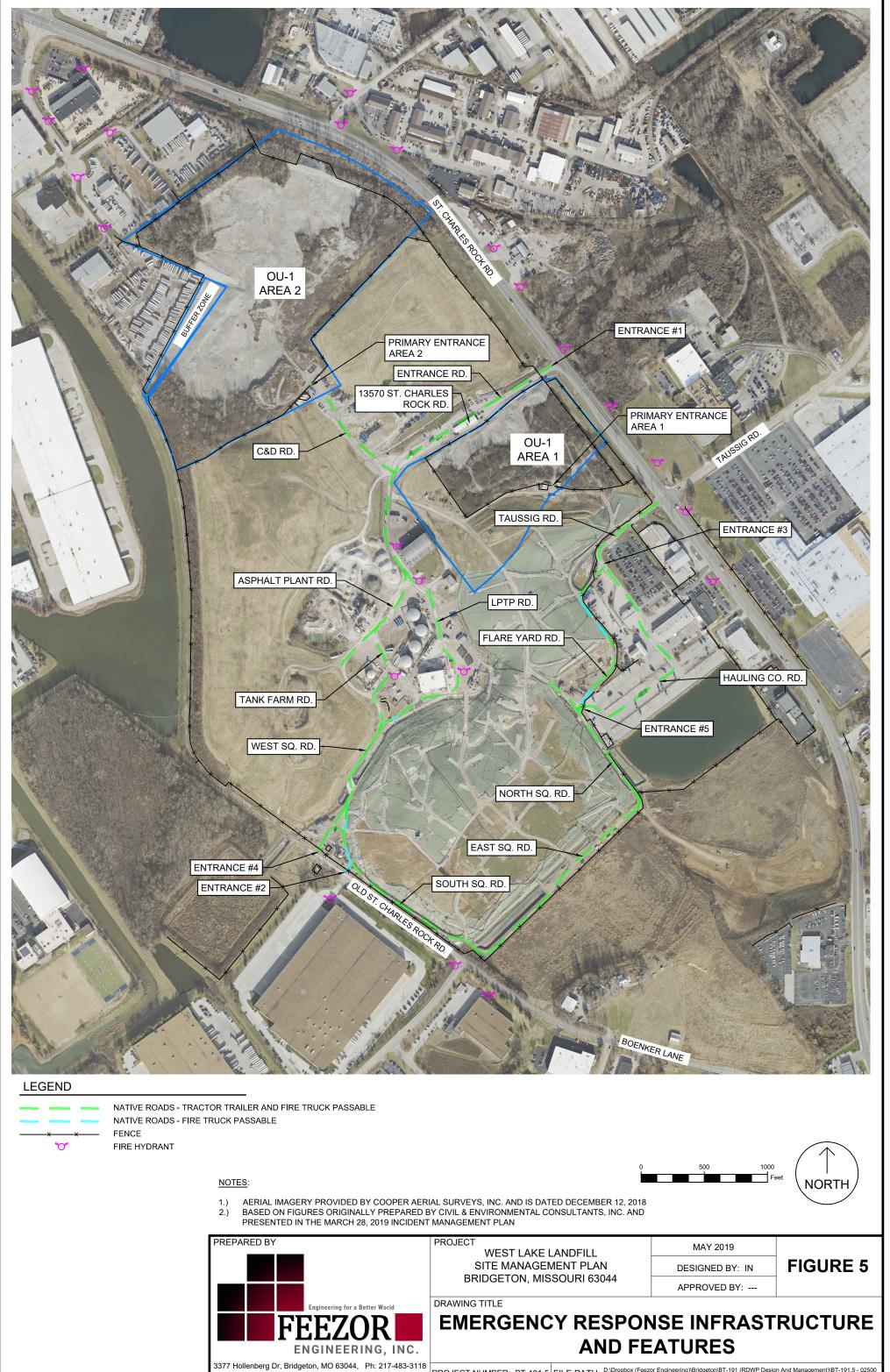
OU-1 AREA 1 FEATURES

PROJECT NUMBER: BT-191.5 FILE PATH: D:\Dropbox (Feezor Engineering)\Bridgeton\BT-191 (RDWP Design And Management)\BT-191.5 - 02500



Missouri State Certificate Of Authority #: E-200912211

PROJECT NUMBER: BT-191.5 | FILE PATH: D:\Dropbox (Feezor Engineering)\Bridgeton\BT-191.5-191 (RDWP Design And Management)\BT-191.5 - 02500



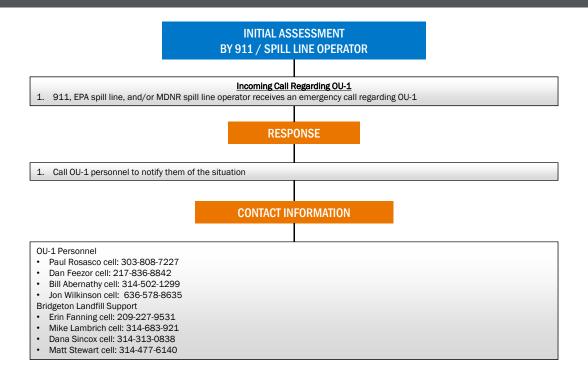
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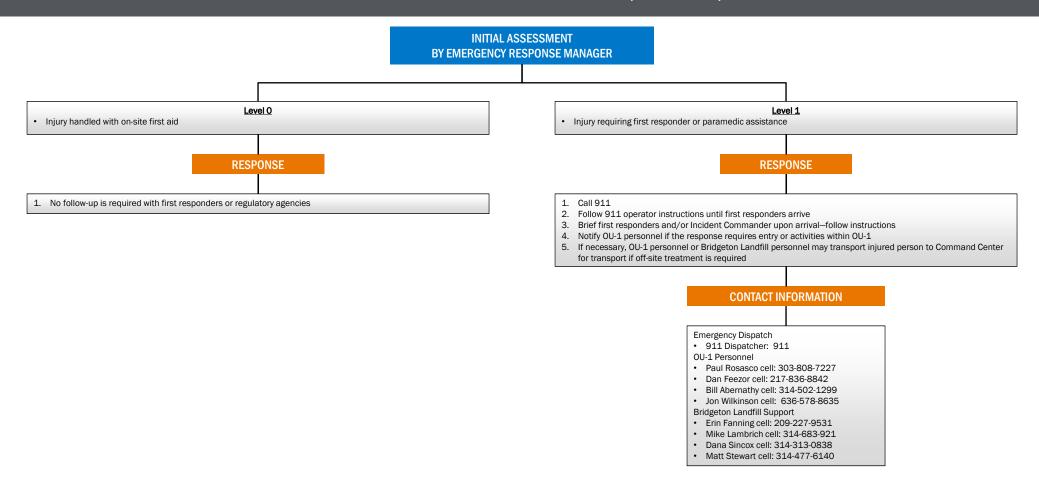
PROJECT NUMBER: BT-191.5 | FILE PATH: Di/Dropbox (Feezor Engineering)\Bridgeton\Br.191.5-IP (RDWP Design And Management)\Br.191.5-02500

Appendix A - Emergency Response Strategies

EMERGENCY - WEST LAKE LANDFILL SUPERFUND SITE OU-1 - INCOMING CALL TO 911 / EPA SPILL LINE / MNDR SPILL LINE



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



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

INITIAL ASSESSMENT BY EMERGENCY RESPONSE MANAGER

Level 0 · Movement within limits of temporary cap or · Little or no exposed waste, and · Minor odor release **RESPONSE** 1. Place soil at the toe of any areas where waste movement occurs in order to stabilize the area(s) 2. Lightly cover tension cracks with clean, clayey soil 3. Notify EPA R7, OU-1 personnel, MDNR-WMP, MDHSS, and St. Louis Co. DoH 4. Notify EPA Region 7 Spill Line 5. Notify Pattonville FD On-duty Battalion Chief and Assistant Chief 6. Notify Robertson FD Assistant Fire Chief

8. Inspect infrastructure for any damage, leaks or failures

9. Implement measures to control run-on and run-off from any areas where waste materials are exposed 10. Monitor for one week; if no further movement, implement relocation of waste material and restoration

CONTACT INFORMATION

Pattonville FD

7. Notify Bridgeton PD

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

Robertson FD

- Assistant Fire Chief: 314-575-5011 Bridgeton PD
- Chief Hood: 314-420-9112
- Major Mossotti: 314-602-3632

EPA Region 7

- Tom Mahler cell: 816-604-0546 EPA R7 Spill Line: 913-281-0991 MDNR-WMP
- Chris Nagel cell: 573-680-5146
- Mike Parris cell: 573-680-6669 MDHSS
- Keith Henke: 573-645-8943

St. Louis Co. DoH

- Mark Milward cell: 314-520-1373 OU-1 Personnel
- Paul Rosasco cell: 303-808-7227
- Dan Feezor cell: 217-836-8842
- · Bill Abernathy cell: 314-502-1299
- Jon Wilkinson cell: 636-578-8635 Bridgeton Landfill Support
- Erin Fanning cell: 209-227-9531
- Mike Lambrich cell: 314-683-921
- Dana Sincox cell: 314-313-0838
- Matt Stewart cell: 314-477-6140

Level 1

- · Massive movement, slope failure, erosion, flooding, tornado or other event that exposes waste material
- Large exposure of waste material or
- Hot (steaming) or burning waste exposed
- Extensive release of gas and/or odors

RESPONSE

- 1. Notify on-site personnel
- Call 911
- Call Pattonville FD On-Duty Battalion Chief and Assistant Chief
- Call Robertson FD Assistant Fire Chief
- Call Bridgeton PD
- Notify EPA Region 7 Spill Line
- Notify EPA R7, OU-1 personnel, MDNR-WMP, MDHSS, St. Louis Co. DoH, and St. Louis Co. OEM
- Place soil at the toe of any areas where waste movement occurs in order to stabilize the area(s)
- 9. Implement measures to control run-on and run-off from any areas where waste materials are exposed
- 10. Lightly cover exposed waste with clean, clayey soil while buttressing toe at direction of professional engineer
- 11. Monitor for one month: if no further movement, implement relocation of waste material and restoration

CONTACT INFORMATION

Emergency Dispatch

• 911 Dispatcher: 911

Pattonville FD

- · On-Duty Battalion Chief: 314-393-4802
- Assistant Chief: 314-393-4807 Robertson FD
- Assistant Fire Chief: 314-575-5011

Bridgeton PD

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

EPA Region 7

- Tom Mahler cell: 816-604-0546
- EPA R7 Spill Line: 913-281-0991

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- 24/7 Emergency: 314-615-5360

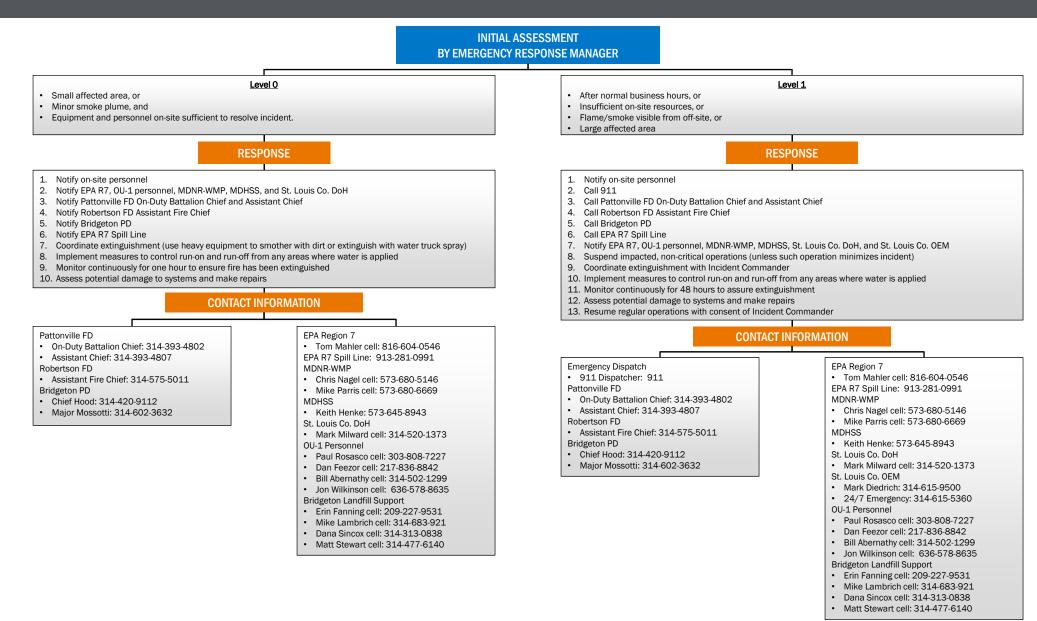
OU-1 Personnel

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

Bridgeton Landfill Support

- Erin Fanning cell: 209-227-9531
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- Matt Stewart cell: 314-477-6140

EMERGENCY - WEST LAKE LANDFILL SUPERFUND SITE 0U-1 - SURFACE FIRE



Appendix B - Emergency Assessment and Response Action Checklist

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

EMERGENCY ASSESSMENT AND RESPONSE ACTION CHECKLIST FOR EMERGENCY RESPONSE MANAGER

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

EMERGENCY DETAILS

Date and Time of Incident:	
Emergency Response Coordinator:	
Description of Emergency:	
Date and Time Normal Operation Resumed:	
·	