Hazardous Waste Contingency Plan

EPA Identification Number COD000695064

HENDERSON MILL

July 2013

Prepared by:

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EXECUTIVE SUMMARY

Purpose:

Although this facility is designed, constructed, maintained, and operated in a manner that minimizes the possibility for emergency incidents such as fire, explosions and any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water, this Contingency Plan has been developed to describe actions that will be performed at the Henderson Mill to minimize the hazards to human health and the environment in the unlikely event of such incidents.

The provisions of this Plan shall be carried out immediately whenever:

1) **The Henderson Mill qualifies as a Large Quantity Generator; and**

2) **There is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.**

Regulatory References

This Contingency Plan has been developed in general accordance with 6 Code of Colorado Regulations (CCR) 1007-3:

- 262.34(a)(4) – Large Quantity Generator Requirements
- 265 Subpart C – Preparedness and Prevention
- 265 Subpart D – Contingency Plan and Emergency Procedures

Review and Revision:

This Contingency will be reviewed and amended, if necessary, whenever:

- Applicable regulations are revised;
- The plan fails in an emergency;
- There are significant changes in the facility, in its design, construction, operation, maintenance or other circumstances that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency ;
- The list of Emergency Response Coordinators (ERC) changes;
- The list of emergency equipment changes; or
- Drills, exercises, or inspections (internal or external) indicate that a change is needed.

Related Plans and Procedures:

The Henderson Mill Contingency Plan has been developed in association with the following plans and procedures:

Title	Purpose
Waste Management Plan	Describes procedures and regulatory requirements for pre-transport handling, labeling, and management of hazardous waste generated on-site.
SPCC/MCP Plan	Spill control, containment and countermeasures plan includes the engineering and administrative controls in place to prevent the discharge of oil or hazardous chemicals to navigable waters.
Henderson Mill Emergency Notification and Emergency Procedures Manual	Outlines emergency notification and emergency procedures for Mill emergency response activities.
Henderson Mill IRM	Outlines the response procedures that are used in the event of an environmental incident
Storm Water Management Plan	Outlines the facilities drainage patterns and practices for preventing storm water contamination.

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1.0 DESCRIPTION OF FACILITIES

The Mill site is approximately 22 miles south of Parshall, Colorado, just off Grand County Road No. 3. The ore processing facilities (mill and concentrator) are located on the western slope of the ridge between the Williams Fork River and the east branch of Ute Creek, Grand County, Colorado. Also present in the vicinity are the mill water and potable water reservoirs, mill water storage tanks, gravel pit, gravel storage area, tailing deposition area with seep water entrapment canal, and runoff diversion canals.

Semi-autogenous milling circuits are used to reduce the size of the ore and liberate economic minerals for collection and concentration by flotation. Approximately five pounds of molybdenum disulfide (MoS_2) concentrate are extracted from each ton of ore. The remaining approximate 1,995 pounds are waste in the form of fine silica sand which is transported by gravity in a water slurry to a tailing deposition area north of the mill site. All water used to transport the tailing is decanted from the surface and returned to the mill for reuse via a completely closed-loop industrial water circuit.

Molybdenum disulfide (MoS_2) concentrate is transported by truck to domestic processing plants or a port for overseas shipment.

2.0 DESCRIPTION OF HAZARDOUS WASTE

Hazardous wastes generated at the Mill site may include:

- Spent solvents;
- Waste paints;
- Broken light bulbs;
- Broken lead acid batteries;
- Outdated chemicals; and
- Non-routine wastes.

These hazardous wastes are typically generated in the Mill building and outlying shops and are stored in satellite accumulation containers. The materials are transported to the central accumulation area for storage prior to being shipped off-site. Non-routine wastes are transported directly to the central accumulation area for storage prior to transportation off-site.

Hazardous wastes are properly characterized, shipped off-site via DOT and EPA approved transportation companies, and disposed, recycled or reclaimed at RCRA permitted facility.

2.1 Use of Chemicals That May Generate Hazardous Waste

Routinely generated wastes at the Henderson Mill include waste solvent. With the exception of the use of Safety Kleen solvent, CRC Natural Degreaser and CRC 226, the mixture of any solvent used and any other materials (e.g., rags and absorbent) are considered hazardous waste and are managed according to the procedures discussed in the Henderson Waste Management Plan.

The use of chlorinated and/or fluorinated solvents for "spray-on and evaporate" uses such as electrical contact cleaning does not involve the generation of waste. However, when the same solvent is used in a "spray-on and wipe off" application, the rag used to wipe off the solvent/dirt and grease mixture is managed as hazardous waste.

2.2 Non-aerosol containers

Hazardous material containers are managed as hazardous waste unless the container is emptied of all material to ensure that less than 1 inch or 3% by weight of the total capacity of the container remains (for containers under 119 gallons in size) or 0.3% by weight of the total capacity of the container remains (for containers greater than 119 gallons in size). If the container has an inner liner, the container is empty when the liner has been removed, but the liner must be emptied to the same specification as described before. If emptied by this procedure, the containers can be placed in the scrap metal container for recycling or disposed of as solid, non-hazardous waste.

2.3 Aerosol Cans

Aerosol cans at the Mill are managed as Universal Waste.

2.4 Compressed Gases

Henderson uses gases such as acetylene and propane products that are returned to the vendor for refilling. Unless containers of hazardous waste materials are emptied through use or subsequent emptying and capturing of the remaining gas, the containers are managed as hazardous waste.

2.5 Non-Routinely Generated Hazardous Wastes

The Henderson Mill does not routinely generate hazardous waste from sources such as a rupture of a mercury electrical switch or spilling of hazardous waste during transport to the storage area. If such an event happens, the Environmental Department must be contacted immediately for handling instructions.

3.0 EMERGENCY RESPONSE ORGANIZATION AND RESPONSIBILITIES

3.1 Emergency Response Contact Information & Responsibilities

Contact information for all response personnel is provided in Appendix A. The responsibilities of each function are discussed below.

3.2 Emergency Response Coordinators

The Emergency Response Coordinators (ERC) shall:

- Be familiar with all aspects of this Emergency Response and Contingency Plan, all operations and activities at the Henderson Mill, the location and characteristics of hazardous wastes handled on-site, the location of records within the facility, and the facility layout;
- Be responsible for managing all emergency response incidents and has the authority to commit resources needed to carry out this Contingency plan;
- Take all reasonable measures to ensure that fires, explosions, and releases do not occur, recur, or spread to other areas of the facility. These measures must include, as appropriate, stopping processes and operations, collecting and containing releases, and removing and isolating leaking systems and containers.
- At least one coordinator shall be on the facility premises or on call with the responsibility for coordinating emergency response measures.
- Be responsible for Emergency Response Coordinator Procedures identified in section 6.0.

The following table lists the primary, secondary, and backup Emergency Response Coordinator for the Henderson Mill facilities.

Table 3-2

EMERGENCY RESPONSE COORDINATOR CONTACT INFORMATION

Title	Name	Work Phone	Cell Phone	Home Phone	Address
Primary	Tim Haynes	303-569-3221 x2284	970-216-5744	970-409-9863	On file with security
Secondary	Bryce Romig	303-569-3221 x1204	303-809-1503	970-762-4104	On file with security
Backup	Boiler Operator	303-569-3221 x2263			

3.3 Health and Safety Department

The Health and Safety Department shall be responsible for providing technical health and safety expertise during an emergency response.

3.4 Mill Control / Boiler Operator

Upon being notified of an emergency incident, Mill Control or the Boiler Operator shall be responsible for:

a. Contacting the Mill Emergency Response Team, if there is an injury or fire.
b. Ensuring that the Facility Emergency Response Coordinator or one of the alternates has been notified.
c. Notifying the on call safety and environmental representative.

3.5 Mill Emergency Response Team (MERT)

Upon being notified of an emergency incident, the MERT shall provide emergency treatment and transportation of injured employees, contractors or visitors and firefighting equipment and aid in extinguishing of fires and containment mitigation of hazardous materials incidents. See Appendix E for contact information for all members of the MERT.

3.6 Area Supervisors and Superintendents

Area Supervisors and Superintendents (or their designees) shall be responsible for assisting the ERC in understanding the systems involved and, as is appropriate and safe to do so, coordinating the shut-down of impacted processes and monitoring of operating systems for leaks, pressure build-ups, gas generation, etc. The Area Supervisor or Superintendent shall also be responsible for notifying their immediate supervisor of the incident.

3.7 Employees and Contractors

CMC employees and contractors are to report hazardous waste spills, releases, fires or explosions to their supervisors and to the security department via the emergency telephone numbers or radio Mayday procedures. CMC employees and contractors may also participate in emergency response activities as directed by the ERC and as appropriate to their level of training.

4.0 EMERGENCY RESPONSE EQUIPMENT & CAPABILITIES

4.1 Emergency Response Equipment & Capabilities

Emergency equipment is located throughout the Mill in close proximity to hazardous waste areas that have an increased risk for potentially harmful releases and incidents. A list of available emergency response equipment is provided in Appendix B. This list includes the location and physical description of the equipment, as well as a brief outline of the equipment's capabilities.

4.2 Communication Equipment

Direct and immediate access to communication equipment is provided for all employees, contractors and visitors, which are involved in hazardous waste operations. Available equipment is listed in Appendix B and includes telephones, radios, and voice communications.

Although it is unlikely only one person would be on-site, individuals working alone in isolated areas away from a telephone are provided a two-way handheld radio to ensure they are able to immediately summon emergency assistance.

All Henderson Mill radio traffic is monitored by Mill Control. Upon learning of an incident that requires assistance or internal/external notification, Mill Control will use telephones, radios and/or the Gaitronics communication system commensurate with the gravity of the incident.

4.3 Emergency Response and Communication Equipment Inspection, Maintenance and Testing

Emergency response and preparedness equipment is inspected by the area in which it is in, with the exception of annual fire extinguisher inspections, which are contracted to a private contractor. Preventive maintenance of other critical equipment is managed through Henderson's Preventive Maintenance System (Ellipse).

Emergency response equipment at the central accumulation area is inspected weekly.

Gaitronics telephones receive routine preventative maintenance.

Emergency evacuation, communication, and response equipment is also tested during annual evacuation drills and mock incident drills, which are discussed in Section 8.0.

4.4 Emergency Response Teams & Capabilities

In additional to equipment specific capabilities, which are identified in Appendix B, Henderson Mill has the following internal emergency response organizations and capabilities.

Mill Emergency Response Team (MERT) consists of Henderson employees who are available during their regular work shift, but are not on call 24-hours per day. The team consists of individuals trained in emergency medical response, rope rescue, confined space rescue, basic hazardous materials response and vehicle extrication.

Waste Collection Personnel are trained to the hazardous materials technician level and are able to respond to, contain and cleanup small to medium sized environmental releases.

Spill Response Equipment is located in the Mill in close proximity to areas that have an increased risk for potentially harmful releases. The locations and capabilities of this equipment are outlined in Appendix B.

5.0 COORDINATION WITH EXTERNAL RESPONSE ORGANIZATIONS

To ensure a rapid and efficient response, Henderson Mill has contacted the following emergency organizations that may have a role in responding to emergencies at our facilities. Henderson Mill will be the primary emergency response authority for all on-property incidents. The agencies/organization outlined below will have supporting roles, as is requested by the Henderson Mill ERC.

Agency	Agreements/Arrangements
Kremmling Volunteer Fire Department	Henderson has contacted the Kremmling Volunteer Fire Department to verify that they are capable of providing emergency response services in the event of an environmental incident. At this time, neither party believes there is a need for a formal agreement.
Grand County Sheriff's Office	Henderson has contacted the Grand County Sheriff's Office to verify that they are capable of providing emergency response services in the event of an environmental incident. At this time, neither party believes there is a need for a formal agreement.
Grand County LEPC	Henderson has contacted the Grand County LEPC to notify them of the types of hazards that are present at the mill site and verify that additional resources are not required. At this time, neither party believes there is a need for additional resources.
Summit County Fire Department	Henderson has contacted the Summit County Fire Department to verify that they are capable of providing emergency response services in the event of an environmental incident. At this time, neither party believes there is a need for a formal agreement.
Summit County Sheriff's Office	Henderson has contacted the Summit County Sheriff's Office to verify that they are capable of providing emergency response services in the event of an environmental incident. At this time, neither party believes there is a need for a formal agreement.
Summit County LEPC	Henderson has contacted the Sumit County LEPC to notify them of the types of hazards that are present at the mill site and verify that additional resources are not required. At this time, neither party believes there is a need for additional resources.
Kremmling Memorial Hospital	Henderson has contacted representatives of Kremmling Memorial Hospital to coordinate responses to emergency medical activities. It has been confirmed that the hospital has the equipment and training required to decontaminate Henderson personnel (with respect to the chemicals located at our facilities) and to handle the types of incidents that may result from a fire or explosion that may occur at the facility. At this time, neither party believes there is a need to document these discussions/arrangements.
Summit Medical Center	Henderson has contacted representatives of Summit Medical Center to coordinate responses to emergency medical activities. It has been confirmed that the hospital has the equipment and training required to decontaminate Henderson personnel (with respect to the chemicals located at our facilities) and to handle the types of incidents that may result from a fire or explosion

	that may occur at the facility. At this time, neither party believes there is a need to document these discussions/arrangements.
Belfor Environmental	Henderson routinely works with Belfor Environmental personnel. As such they are familiar with the mill site and the hazards that are present. Belfor Environmental has agreed to provide assistance responding to spills that are too large or hazardous to be controlled and cleaned up with internal resources. An agreement has been developed and executed between Henderson and Belfor (see Appendix F).

6.0 EMERGENCY RESPONSE PROCEDURES

This section provides an overview of Henderson Mill procedures for responding to hazardous waste spills, releases, fires, or explosions or injuries.

Section 6.2 – 6.4 below summarize emergency response procedures specific to Large Quantity Generators in Colorado. As such, during scenarios where the Henderson Mill is classified as a Large Quantity Generator and an emergency response is required, this procedure should be used in tandem with the IRM to ensure the safety of human health and the environment and to meet all applicable requirements.

6.1 Employee Response - Fires, Explosions, Spills and other Environmental Releases

The procedures to be followed in the case of fire, explosion, spills or other environmental releases are described in the Henderson Mill Incident Response Manual (IRM).

6.2 Emergency Response Coordinator (ERC) Response - Fires, Explosions, Spills and other Environmental Releases

Table 6-2
EMERGENCY RESPONSE COORDINATOR (ERC) PROCEDURES
Whenever there is an imminent or actual emergency situation, the ERC (or his/her designee when on-call) must immediately:
(1) Activate internal alarms or communications systems if they have not already been activated to notify all facility personnel;
(2) Notify appropriate state or local agencies with designated response roles if their help is needed.
Whenever there is a release, fire, or explosion, the ERC shall immediately identify the following related to the released materials:
a. Its character; **b.** The exact source; **c.** The amount or volume of the release; and **d.** The areal extent. This can be accomplished by observation or review of facility records or manifests and, if necessary, by chemical analysis.
The ERC shall assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment shall consider both direct and indirect effects of the release, fire, or explosion.
If the ERC determines that the facility has had a release , fire or explosion that could threaten human health or the environment, outside of the Henderson Mill site, he/she must immediately notify government authorities in accordance with Henderson Mill's IRM.

During an emergency, the ERC shall take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility.
The ERC shall determine objective and priorities in response to the incident including: a. Determine mitigation actions; b. Identify resources required for response; c. Mobilize those resources; d. Stopping processes and operations; e. Collecting and containing released waste; and f. Removing or isolating containers.
If Henderson stops operations in response to a fire, explosion or release, the ERC shall monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment, wherever this is appropriate.
Immediately after an emergency, the ERC shall provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release fire or explosion at the Mill.
The ERC shall ensure that, in the affected area(s) of the facility:
a. No waste that may be incompatible with the released material is treated, stored, or disposed until cleanup procedures are completed; and b. All emergency equipment listed herein is cleaned and fit for its intended use before operations are resumed.

6.3 Notification of Government Agencies

Verbal and written government agency notifications shall only be made by the Environmental Department, or their designee (as appropriate to the agency requiring notification). These notifications shall be made according to the following procedures:

- Henderson Mill's Incident Response Manual (IRM).

In addition, Henderson shall note in its operating record, the date, time, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the CDPHE, Hazardous Materials and Waste Management Division.

6.4 Follow-Up

Following an initial emergency response, the ERC must work with the appropriate Henderson personnel and departments to ensure that cleanup and other recovery activities are completed expediently.

If Henderson personnel cannot conveniently or safely cleanup a release, a private cleanup company will be hired. Contaminated wastes shall be managed in accordance with state and federal solid and hazardous waste rules and regulations. As such, it is essential that environmental personnel be involved in cleanup and disposal activities.

Following the emergency incident, employees involved in the response should participate in a critique which will evaluate:

1. Response effectiveness;
2. Equipment problems;
3. Training requirements or updated training needs;
4. Root Cause, including whom, what, when and why; and
5. Applicable SOPs, engineering controls, infrastructure, and surveillance.

7.0 EVACUATION PLANS

Due to the size and complexity of the Mill property, evacuation plans/procedures have been divided into two categories, general procedures and area-specific procedures.

7.1 General Procedures

Immediately upon observing an incident, employees, contractors and visitors are to evacuate the immediate vicinity and call security, if they have a radio, dial any channel **"1 through 8"** and call "Mayday", "Mayday", "Mayday". Immediately upon hearing the Mayday call, all employees, visitors, and contractors are required to stop what they are doing and listen for further instructions, while observing radio silence.

Incipient stage fires, or small spills shall be managed in accordance with parts 5, 6, and 7 of the Emergency Response Procedure by designated and properly trained personnel.

It is improbable that an incident would require evacuation of the entire property. Thus, area-specific evacuation instructions will be conveyed to personnel over the radio.

7.2 Area Specific Evacuation Plans

Area-specific evacuation plans and maps are described in the Henderson Mill Emergency Notification and Emergency Procedures Manual. These plans are:

- Reviewed/tested at least once per year by area representatives and Safety Personnel;
- Communicated to employees, contractors and visitors during orientation; and
- **Posted throughout the area**.

It is the responsibility of the area/department to ensure personnel, contractors and visitors are aware of these plans and procedures.

8.0 TRAINING PROGRAM

This whole section can possibly be reference out to the IRM

8.1 Training

Training for emergency response activities at the Henderson Mill is conducted to provide a sufficient staff of employees with the proper knowledge for a defensive response to an emergency situation. Henderson Mill requires that only designated employees (delegated by scene supervisor or commander) that are trained respond to an emergency situation, all other employees are directed to evacuate the scene of an emergency.

Standard training for personnel authorized to respond to and direct work at an emergency shall include 24-hour or 40-hour emergency response training. These individuals shall also attend an 8-hour refresher course annually to maintain their certification.

8.2 Evacuation Drills

Evacuation drills are held in each area at least annually to ensure alarms, communication equipment and procedures effectively enable evacuation of hazardous areas. These drills shall be coordinated by the Operations Manager or Safety Department.

8.3 Mock Incident Drills

Mock incident drills shall be held throughout the year to test the effectiveness and adequacy of Henderson Mill's emergency response procedures and equipment. Performance during these drills shall be closely monitored and thoroughly discussed to assess opportunities for future improvement.

8.4 Incident Response Debriefing

Post incident debriefings shall be held to discuss emergency response activities, share learnings, and assess areas of opportunity for improvement (tools, preparedness, machinery, etc.).

8.5 Incident Investigation

All safety and environmental incidents shall be thoroughly investigated to determine their root cause(s) and to assess opportunities for future prevention of similar incidents.

9.0 REVISION HISTORY

Revision Date	Description of Changes
February-2011	Initial Release
April-2013	Annual Review
July-2013	Updated SAA's and MERT Team Call Out

Appendix A
Emergency Contact Information

Appendix A

Emergency Contact Information

EMERGENCY RESPONSE COORDINATOR CONTACT INFORMATION					
Title	**Name**	**Work Phone**	**Cell Phone**	**Home Phone**	**Address**
Primary	Tim Haynes	303-569-3221 x2284	970-216-5744	970-409-9863	On file with security
Primary	Amber Moran	303-569-3221 x2235	720-400-9459		On file with security
Secondary	Bryce Romig	303-569-3221 x1204	303-809-1503	970-762-4104	On file with security
Backup	Boiler Operator	303-569-3221 x2263			

EMERGENCY NOTIFICATION CONTACTS			
NAME	**EXTENSION**		
Mill Control	2310		
Boiler Operator / Pond Operator	2263 or 2911 and/or radio channel 5		
ERC	2284		
Hoistman (Mine)	303-569-3221 x1320		
NAME	**EXTENSION**	**HOME PHONE**	**CELL PHONE**
Steve Schake	2225	970-724-9368	970-409-7902
Tom Gleaton	1342	303-384-9511	303-809-0737
Tim Petersen	2327		949-370-0044
Ray Budisavljevic	2222	970-557-3086	970-409-9196
Marcus Ammon	2214		
Mike McDonald	1000		
Kim Grande	2345	970-485-0660	720-933-3084

Appendix B

Emergency Response Equipment and Capabilities

Appendix B

Emergency Response Equipment

Table B-1

EQUIPMENT	LOCATION	CAPABILITIES
Fire Protection Equipment		
Fire Truck	Fire House Mill Building	Extinguishing of medium/large incipient stage fires
Fire Extinguishers	Various locations throughout facility.	Extinguishing of small incipient stage fires.
Hydrants	Various locations	Provide emergency water supply
Drafting from creeks, rivers, ponds and lakes	Various	Provide emergency water supply
Water Truck	Mine	Provide emergency water supply
Fire suppression system	Various buildings	Emergency fire suppression
First Aid		
First Aid Kits	Various locations throughout facility.	Management of injuries/illness prior to arrival of Emergency Response Team.
Automatic Defibrillators	Various	Resuscitation of cardiac arrest patients.
Medical Oxygen Bottle	Various	Emergency Oxygen supply
Eyewashes and Emergency Showers	Various locations throughout facility.	Decontamination of employees, contractors, and visitors.
Communications		
Radio System	Various	Internal notification of incidents, coordination of emergency response activities and requests for assistance.
Gaitronics Phones	Various	Internal notification of incidents, coordination of emergency response activities and requests for assistance.
Voice	Various	Notification of evacuations in the immediate vicinity of an incident and communication during an emergency response.
Spill Response/Containment Equipment		
Heavy Equipment	Various	Constructing containment around large environmental releases.
Spill Kit / Clean Up Materials	Various	Containment and clean-up of minor leaks or spills.

Appendix C

Emergency Response Specific Training

Appendix C

Emergency Response Specific Training

Training Class	*Frequency*	*Topics Covered*
Employees		
MSHA (24 hr or 48 hr)	Once	Emergency communications; emergency Identification and evacuation; fire extinguisher use; health and safety practices; environmental awareness; first aid
MSHA (8 hr refresher)	Annual	Emergency communications; emergency identification and evacuation; fire extinguisher use; health and safety practices; environmental awareness; first aid
Evacuation Drills	Annual	Familiarization with area-specific evacuation procedures and emergency response equipment *(first aid kits, fire extinguishers, eye washes, spill kits, etc.)*
Emergency Response Simulations	Intermittent	Responses to mock emergency situations.
Contractors		
MSHA (24 hr or 48 hr)	Once	Fire extinguisher use; health and safety practices
MSHA (8 hr refresher)	Annual	Fire extinguisher use; health and safety practices
Site Hazard Training	Annual	Emergency communications; emergency evacuation; site familiarity
Environmental Training	Annual	As applicable to their work, environmental awareness of SPCC, SWMP, and EMS procedures and practices required to prevent incidents and minimize environmental impacts.
Visitors *(In addition to the following training, visitors are required to be attend by a Mill Employee.)*		
Site-Specific Hazard Training	Annual	Emergency communications; emergency evacuation; site familiarity
Mill Emergency Response Team		
Emergency Medical Training	As Required	MERT members receive training appropriate to their responsibilities and certifications (e.g. advanced first aid, training to be a First Responder, training to be an Emergency Medical Technician, etc.)
Environmental Department		
Hazardous Materials Response Training	Annual	Identification and defensive tactics for responding to environmental releases.
Waste Management Personnel		
Hazardous Materials Response Training	Annual	Waste management personnel are trained to the Hazardous Materials Operations Levels and are able to respond to and contain on-site spills and releases.
RCRA Training	Annual	Hazardous waste identification, handling, storage, inspections, and disposal
DOT Training	Triennial	Hazardous materials identification, packaging, labeling, loading, storage

Appendix D

Satellite and Central Accumulation Areas

Appendix D

Satellite and Central Accumulation Areas

Table 1-D

Satellite Accumulation Areas

Location	Waste Type	Communications Phone/Radio	Fire Extinguishers	Source of Fire Water	Spill Control Materials	PPE	Alarms
Sample Prep Lab	Solvents	Phone and Radio	Readily Available	Process Water	Readily Available	Readily Available	Alarm through Gaitronics Phone System
Assay Lab	Acetone	Phone and Radio	Readily Available	Process Water	Readily Available	Readily Available	Alarm through Gaitronics Phone System
Maintenance Shop	Solvent Rags	Phone and Radio	Readily Available	Process Water	Readily Available	Readily Available	Alarm through Gaitronics Phone System
Loci Shop	Solvent Rags	Phone and Radio	Readily Available	Process Water	Readily Available	Readily Available	Alarm through Gaitronics Phone System
Mobile Equipment Shop	Solvent Rags	Phone and Radio	Readily Available	Process Water	Readily Available	Readily Available	Alarm through Gaitronics Phone System
Assay Lab	Atomic Absorption Unit Effluent	Phone and Radio	Readily Available	Process Water	Readily Available	Readily Available	Alarm through Gaitronics Phone System
Sample Prep Lab	AutoCAT 9000 Titrate Waste	Phone and Radio	Readily Available	Process Water	Readily Available	Readily Available	Alarm through Gaitronics Phone System
Warehouse	Waste Paint Materials	Phone and Radio	Readily Available	Process Water	Readily Available	Readily Available	Alarm through Gaitronics Phone System

Central Accumulation Area

Location	Waste Type	Communications Phone/Radio	Fire Extinguishers	Source of Fire Water	Spill Control Materials	PPE	Alarms
Hazardous Waste Building	Hazardous Waste Universal Waste Recycled Waste PCB Waste	Phone and Radio	Readily Available	Process Water	Readily Available	Readily Available	Alarm through Gaitronics Phone System

Appendix E

MERT Team Members

Table 4-2			
MILL EMERGENCY RESPONSE TEAM (MERT)			
Name	**Department / Crew**	**Call Out #**	**Designation**
Sam Wood	Engineer/4700	970-531-3142	CO CAPTAIN
Ted Wall	Mill Maint/4211	970-485-9374	CAPTAIN
Jeremy Nixon	Mill Maint/4214	970-531-3388	CO CAPTAIN
Gore Erick II	Mill Maint/4212	970-724-0705	
Dave Greenwalt	Convey Ops/3112	970-725-3354	
Jake Graves	Mill Maint/4214	970-485-5253	
Adams Griz	Mill Ops/4114	970-724-3734	
Todd Warning	Mill Maint/4211	970-531-3752	
Earl Martin	C & C/3211	970-629-1485/970-887-3430	
Amber Moran	Enviromental	303-718-6332	CO CAPTAIN
Amanda Healy	Mill Ops/4111	970-531-0459	
Rob Stefanik	Mill Ops/4113	970-531-5029	
Mitch Stinnett	Packing/4115	719-293-1447	
Matt Carlson	Mill Elect/4300	720-838-4028	
Steve Schake	Safety	970-724-9368	MILL SAFETY