

**SECTION 7**  
**RCRA CONTINGENCY PLAN**  
**US Ecology Nevada**  
**June 2022**

## Contingency Plan Quick Reference Guide

**Location:** US Ecology Beatty Nevada-Hazardous Waste Treatment, Storage and Disposal Facility (TSDF) Landfill.  
Highway 95, 11 Miles South of Beatty, Nevada

**Permits:** RCRA NEVHW0025, Version 6  
TSCA Approval, NVT330010000

**Contingency Plan Version:** June 2021

**Section 1: Types and Names of the hazardous wastes onsite**

Types of hazardous waste that can be onsite include: Corrosive waste, such as acids (pH <2.0) or bases (pH>12.5); oxidizing waste; flammable waste (flashpoint <140°F); cyanide bearing waste, both reactive and non-reactive; aerosol can;, and heavy metal bearing waste. Hazardous waste may be solid or liquid.

**Section 2: Maximum amount of each hazardous waste onsite at any one time**

UNIT DESCRIPTION	AMOUNT	UNITS	WASTE TYPE
PCB/RCRA Storage Building/DEA Storage (CMU #1)	~294/59,400	Cubic yards/gallons	RCRA Waste and PCB Materials
Dry Hazardous Waste Storage Area #2 (CMU #6)	~1,241/250,696	cubic yards/gallons	RCRA and non-RCRA Waste
Dry Hazardous Waste Storage Area #3 (CMU #17)	~3,438/694,516	cubic yards/gallons	RCRA and non-RCRA Waste
Bin Storage Area (CMU #7)	400/80,778	cubic yards/gallons	Stabilization Waste
Container Management and Stabilization Building, CMS (CMU #16)	~1,220/246,520	cubic yards/gallons	RCRA and non-RCRA Waste
Container Management and Storage Building CMS 2 (CMU #19)	~1,009/203,700	cubic yards/gallons	RCRA and non-RCRA Waste
Main Laboratory	425	gallons	Lab Wastewater
Main Laboratory	220	gallons	SAA drums (4) of lab wastes
Satellite Laboratory	425	gallons	Lab Wastewater
Satellite Laboratory	110	gallons	SAA drums (2) of lab wastes

**Section 3: Identification of any hazardous waste that would require unique or special medical treatment in the event of exposure.**

Hydrofluoric Acid

**Section 4: A map of the facility identifying the location of hazardous waste**

Attachment A: Container Management Location Map

**Section 5: A street map of the facility in relation to surrounding businesses, residences and schools.**

Surrounding land uses include undeveloped BLM land to the north, south and west, and Highway 95 to the east. The nearest business and residence is 8 miles to the north.

Attachment B: US Ecology Nevada Location Map

**Section 6: The location of the water supply**

Attachment C: Evacuation Plan Map (#6 Water supply)

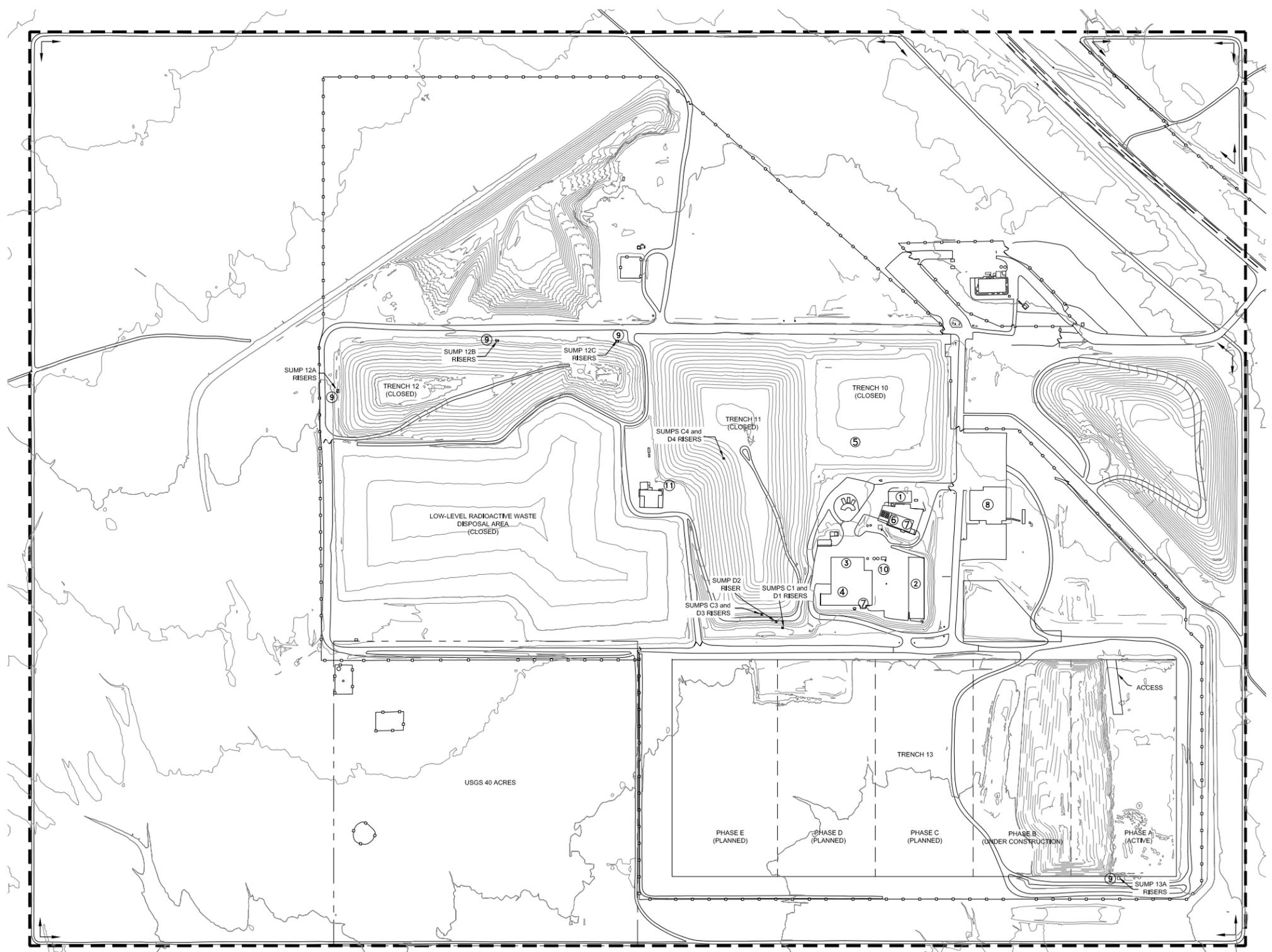
**Section 7: Information about any on-site notification systems to communicate with people at the facility.**

Communication with on-site employees is accomplished with hand -held radios, cell phones, desk phones and alarm systems.

**Section 8: The name of an emergency coordinator at any time.**

LIST OF EMERGENCY COORDINATORS					
US ECOLOGY – BEATTY, NEVADA					
EMERGENCY COORDINATOR (EC)	NAME	JOB TITLE	STREET ADDRESS	CONTACT NUMBERS	
Primary Coordinator	Bryan Greager	General Manager	8310 Coke Street Las Vegas, NV 89131	Cell	702-303-0899
1 <sup>ST</sup> Alternate	Ron Browning	H & S Manager	1100 N 'A' Ave, #B-21 Beatty, NV 89003	Cell	775-277-0426
2 <sup>nd</sup> Alternate	Franklin Irelan (Jake)	Operations Manager	5250 Wheatland Pahrump, NV 89061	Cell	702-764-1905
3 <sup>rd</sup> Alternate	Shannon Moore	Stabilization Supervisor	1730 Bridger Street Pahrump, NV 89048	Cell	775-253-4689

**ATTACHMENT A**  
**CONTAINER MANAGEMENT LOCATION MAP**



**LEGEND**

- — — — — PROPERTY LINE
- — — — — — SECURITY FENCE
- ~ ACCESS GATE
- — — — — INTERNAL ROADWAYS
- - - - - USGS 40 ACRES
- MAJOR CONTOUR (5 FEET)
- └ TORTOISE FENCE

**CONTAINER MANAGEMENT UNITS**

- ① PCB BUILDING, CMU #1
- ② DHWSA 2, CMU #6
- ③ BIN STORAGE PAD, CMU #7
- ④ CONTAINER MANAGEMENT BUILDING, CMU #16
- ⑤ DHWSA 3, CMU #17
- ⑥ AEROSOL RECLAMATION UNIT AND STAGING AREA
- ⑦ DRUM RE-USE MANAGEMENT AREA
- ⑧ CONTAINER MANAGEMENT AND STORAGE BUILDING, CMU #19
- ⑨ LEACHATE - 90 DAY ACCUMULATION AREA
- ⑩ BAGHOUSE - 90 DAY ACCUMULATION AREA



SCALE: 1" = 500'

Drawing provided at 11 Inch by 17 Inch for convenience. Drawing at 24 Inch by 36 Inch is available upon request.

ISSUED FOR REGULATORY REVIEW	05/14/19
SITE MODIFICATIONS	05/08/20
SITE MODIFICATIONS	10/16/20



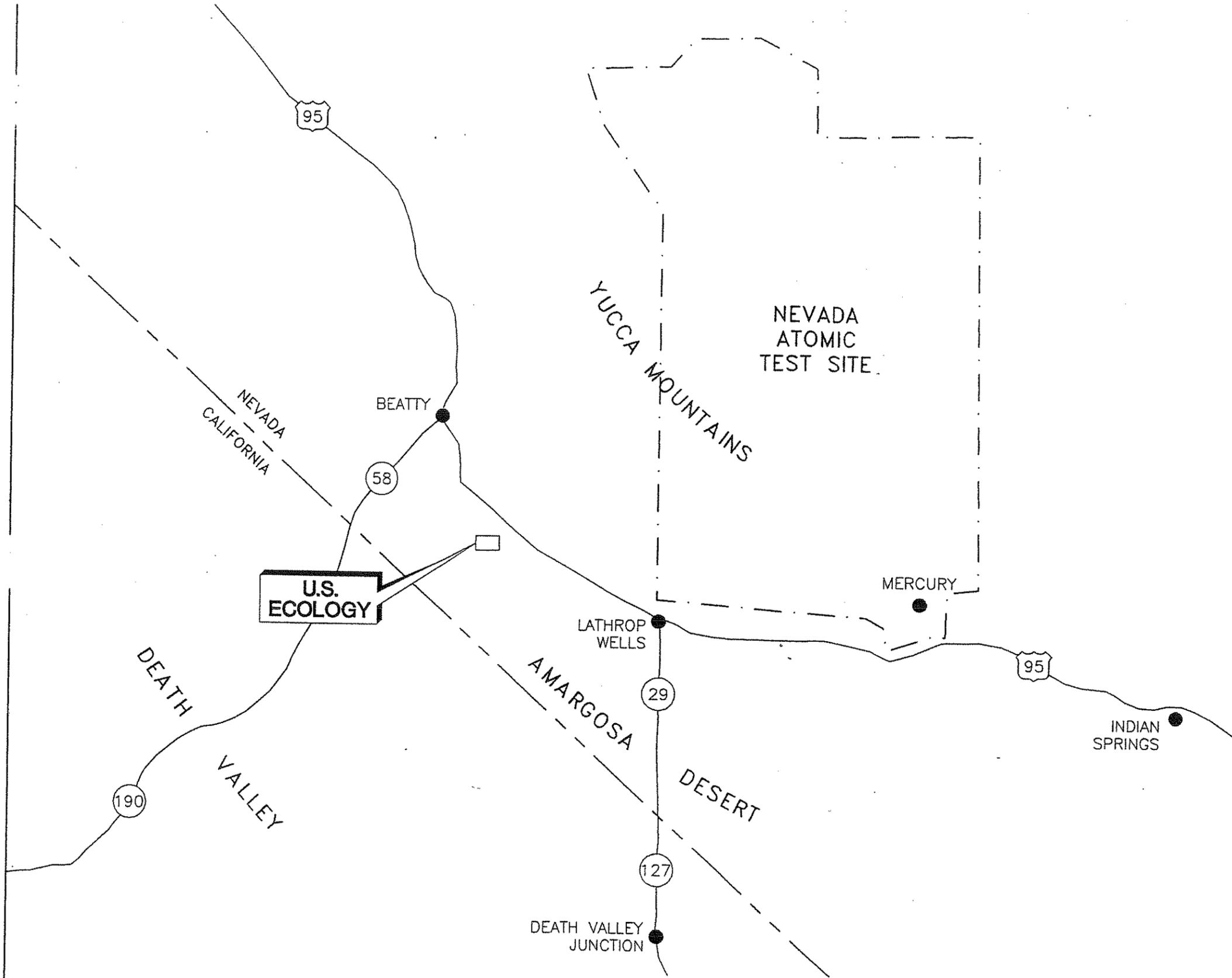
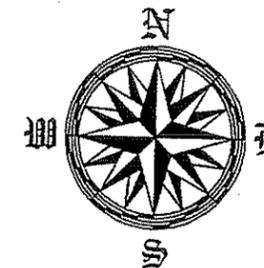
US ECOLOGY NEVADA INC.  
HAZARDOUS WASTE MANAGEMENT FACILITY  
BEATTY, NEVADA

**CONTAINER MANAGEMENT UNIT LOCATIONS**



CK	12/12/19	CAB	12/12/19	DRAWING NO: NA
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**ATTACHEMENT B**  
**US ECOLOGY LOCATION MAP**



Rev	Drawn	Check	Appr	PE Appr	Date	Description

**US Ecology**  
 an American Ecology company  
 US Ecology Inc.  
 5333 WESTHEIMER  
 Suite 1000  
 Houston, Texas 77056

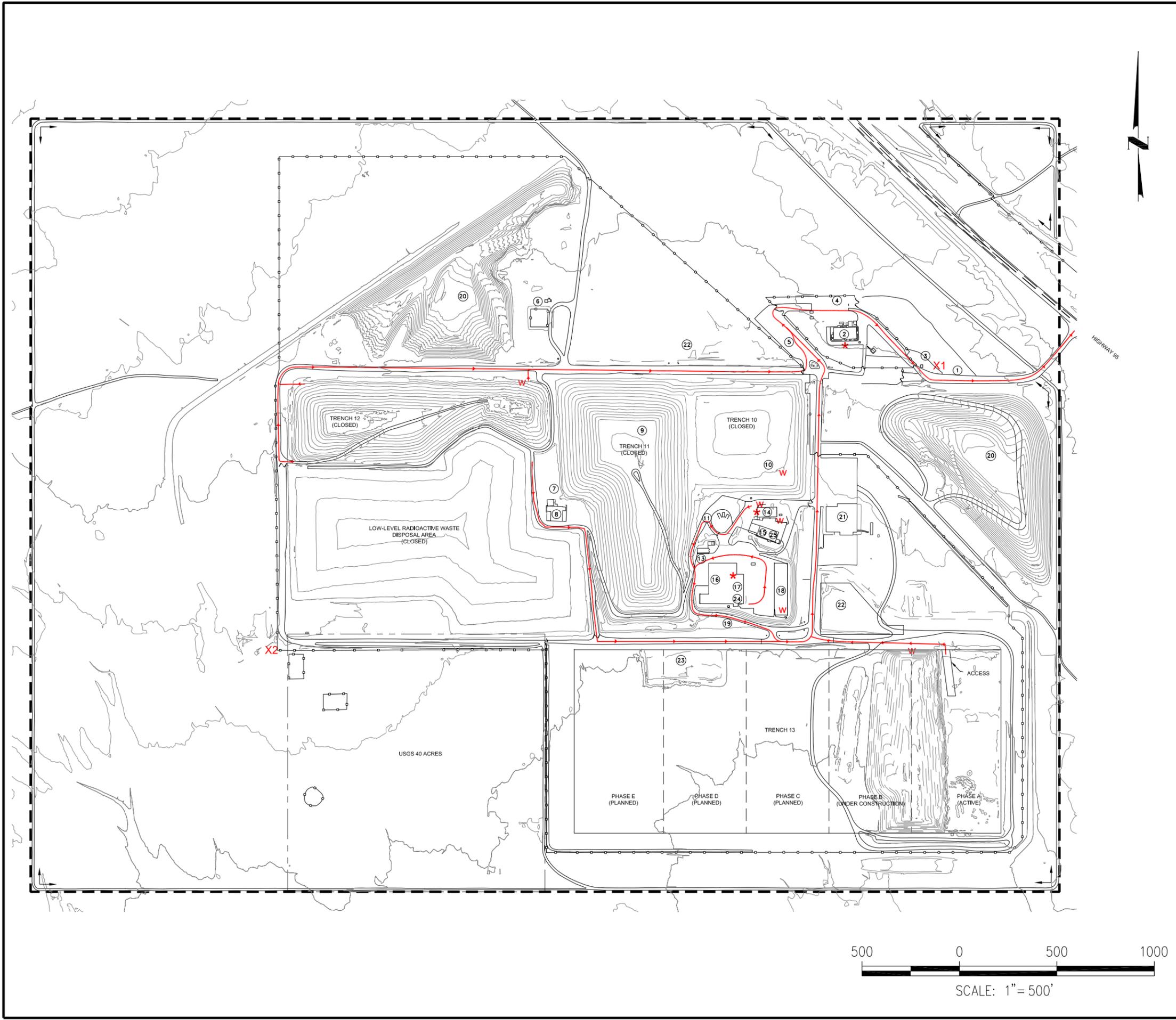
Drawn By: DKK  
 Checked By: EEP  
 Appr. By: PE  
 PE Appr. By: PE  
 Date: 11-93  
 Scale: AS NOTED  
 Project No.: NV148

**REGIONAL SITE LOCATION MAP**  
**CELL 12**  
 HAZARDOUS WASTE MANAGEMENT FACILITY  
 U.S. Ecology, Inc.  
 BEATTY, NEVADA

Reference Drawings

Drawing No. **NV-148-FIG-001** Revision No. **0**

**ATTACHMENT C**  
**EVACUATION PLAN MAP**



**LEGEND**

- ① MAIN SITE ENTRANCE
  - ② ADMINISTRATION OFFICE AND MAIN LABORATORY
  - ③ SECURITY AND DRIVERS TRAILER
  - ④ INBOUND AND OUTBOUND SCALES
  - ⑤ TRUCK SAMPLING STATION
  - ⑥ WATER STORAGE
  - ⑦ FUEL STORAGE
  - ⑧ MAINTENANCE SHOP
  - ⑨ WEATHER STATION AND TRENCH 11 LYSIMETER
  - ⑩ DRY HAZARDOUS WASTE STORAGE AREA 3
  - ⑪ OUTDOOR TREATMENT PANS
  - ⑬ OPERATIONS OFFICE
  - ⑭ PCB PROCESSING AREA AND STORAGE/PCB TANK FARM
  - ⑮ AEROSOL RECYCLING UNIT
  - ⑯ CONTAINER MANAGEMENT AND STORAGE BUILDING
  - ⑰ INDOOR TREATMENT PANS
  - ⑱ DRY HAZARDOUS WASTE STORAGE AREA 2
  - ⑲ EVAPORATION TANK (TRUCK WASH PAD)
  - ⑳ SOIL STOCKPILE
  - ㉑ CONTAINER MANAGEMENT STORAGE BUILDING AND OFFICE TRAILER
  - ㉒ TRUCK STAGING AREA
  - ㉓ CLAY REAGENT STORAGE
  - ㉔ SATELLITE LABORATORY
  - ㉕ DRUM RE-USE MANAGEMENT AREA (PROPOSED)
- — — — — PROPERTY LINE
  - — □ — □ — □ — □ SECURITY FENCE
  - ∩ ACCESS GATE
  - — — — — INTERNAL ROADWAYS
  - - - - - USGS 40 ACRES
  - — — — — MAJOR CONTOUR (5 FEET)
  - └┘ TORTOISE FENCE
  - ➔ PRIMARY EVACUATION ROUTE
  - X1 PRIMARY MUSTER AREA
  - X2 SECONDARY MUSTER AREA
  - \* PULL ALARM LOCATION
  - W WINDSOCK LOCATION

Drawing provided at 11 inch by 17 inch for convenience. Drawing at 24 inch by 36 inch is available upon request.

0	ISSUED FOR REGULATORY REVIEW	05/14/19
1	SITE MODIFICATIONS	05/08/20
2	SITE MODIFICATIONS	10/16/20



US ECOLOGY NEVADA INC.  
HAZARDOUS WASTE MANAGEMENT FACILITY  
BEATTY, NEVADA



**EVACUATION PLAN**



**SECTION 7**

**RCRA CONTINGENCY PLAN**

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Appendix 7 C	Coordination Agreement Letters
Appendix 7 D	List of Emergency Equipment

## **SECTION 7 CONTINGENCY PLAN**

### **7.1.0 Facility Description**

US Ecology Nevada (USEN) operates a waste management facility in the Amargosa Desert 11 miles south of Beatty, Nevada. Wastes accepted on-site include RCRA hazardous wastes, PCBs regulated under the TSCA, and non-hazardous wastes.

In the event that an emergency condition occurs that has the potential to threaten human health or the environment, the following contingency plan will be implemented until the condition has been stabilized.

### **7.2.0 Emergency Coordinator**

The General Manager appoints the primary and alternate Emergency Coordinators (EC). An EC is on site or readily available 24 hours a day, 7 days a week. When the Contingency Plan is implemented, the EC is authorized to commit the resources needed to carry out the Contingency Plan. The EC Phone Number List (Appendix A) contains all emergency notification telephone numbers.

### **7.3.0 Implementation of the Facility Contingency Plan**

Employees<sup>4</sup> will immediately notify the EC upon identifying any fire, explosion or release of hazardous waste or constituents which could threaten human health or the environment.

Upon notification and verification that one of these events has occurred, the EC will implement the Contingency Plan, and delegate responsibilities to other facility employees, such as the Lab Manager for waste identification, the Environmental Manager for external notifications, and the Health & Safety Manager for traffic control or selection of appropriate PPE.

#### **7.3.1 Fire and/or Explosion Involving Hazardous Materials**

A “fire that could threaten human health or the environment” is defined as combustion of waste such that it is not readily controllable by facility personnel using on-site equipment and/or available fire extinguishing material (e.g.; fire extinguishers, water, dirt). Incidental fires in non-waste management areas or in controlled areas, such as the stabilization pan, which can be readily extinguished, may be an “incident” for purposes of this plan if they pose a threat to human health or the environment.

In the event of a fire and/or explosion requiring implementation of the Contingency Plan, the following actions will take place:

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<sup>4</sup> Including, for the purposes of this plan, any off-hour security employees or contractors.

1. The EC will notify all facility personnel by activating the Emergency Alert System either at the main panel at the Administration building, outside the front door of the PCB building, or outside the Stabilization control room. This is the primary emergency notification system.
2. When the emergency alarm is activated:
  - All key personnel in possession of FM radios will immediately establish voice communication with the EC.
  - The EC will determine which facility operations might likely be impacted by emergency response activities and will instruct those operations to cease or otherwise alter their operations, as appropriate.
  - If directed by the EC, all personnel will proceed to their designated emergency muster areas.
  - If and as directed by the EC, incoming vehicular traffic will be halted or reduced, with the exception of emergency assistance traffic, if required.
3. Injured personnel will be immediately removed to a safe location, and qualified personnel will administer appropriate first aid. **Note:** Employees requiring medical treatment will be transported to the appropriate medical facility, as determined by the extent of their injuries, utilizing county ambulance or medical flight service, whenever possible, or by other means if and as necessary.
4. All movement to the emergency muster area will be via an up-wind route. An up-wind route may be established by watching any visual emissions or wind socks. If movement via an up-wind route is not possible, the affected personnel will notify the EC of the situation.
5. The EC will account for all personnel, visitors and contractors.
6. The EC will begin assessment of the incident through observations for the following criteria:
  - The nature and extent of the incident (fire and/or explosion, and magnitude);
  - The location of the incident;
  - The nature and quantities of materials involved (review of waste profiles, manifests, disposal records, computer records, cell coordinates);
  - The potential for escalation through subsequent explosions or the spread of fire to other hazardous materials;
  - The intensity of the fire or explosion;
  - The extent of released material to the air and immediate surrounding area;
  - Wind direction and relative speed;
  - The potential for short and long-term effects, with regards to human health and the environment;
  - The need for additional outside assistance and/or evacuation. (NOTE: No firefighting by trained facility personnel will be attempted if there is significant risk of injury to said

personnel. Normally, only outbreak stage fires, which can be rapidly contained and controlled, will be handled);

- The proper extinguishing medium for the fire will be established by the EC (e.g., foam, dry chemical, water, soil, etc.);
- If the EC determines that 1) the fire and/or explosion threatens human health and the environment outside the facility boundaries; 2) additional outside assistance is necessary to bring the incident under control; or 3) evacuation of local the area is necessary; the EC will immediately establish communication with local emergency response agencies, as appropriate, in accordance with this plan. Emergency telephone numbers can be found in the EC Phone Number List (Appendix A).

7. If the EC determines that the potential for an impending explosion is high, the EC will notify local emergency response agencies for assistance.

8. The EC will direct all on-scene USEN response efforts and, as appropriate and necessary, coordinate activities involving outside agencies. The EC will direct the following response efforts, as appropriate and necessary:

- Ensure all personnel not required for response efforts are evacuated to a safe area (i.e., non-essential personnel, visitors, contractors.);
- Establish necessary lines of communication;
- Provide all necessary PPE;
- Continually monitor the affected areas through observation for sign of escalation, release, or impending explosions due to gas or vapor build-up;
- Monitor piping systems and tanks if those areas are involved or threatened;
- Ensure all feed lines to the PCB storage tanks and propane tank are closed, if necessary and if possible;
- Limit or restrict the use of motor vehicles in the affected area to avoid ignition or re-ignition of flammable vapors and/or gases;
- If practical, remove or isolate any waste containers or shipments that could become involved if the situation escalates or if the waste containers or shipments would be detrimental to the present situation;
- Collect and/or contain, to the extent practical, any released waste; and / or
- Construct soil dikes and/or barrier walls to serve as firebreaks and as temporary segregation measures, to prevent the spread of fire to other waste containing areas, and to control run-off discharge from the facility. These structures will be constructed utilizing heavy equipment as long as the operation of such equipment will not increase the potential for ignition or re-ignition of any flammable vapors.

9. Upon recovery from the emergency, the EC will ensure that all contaminated emergency equipment will be decontaminated. Decontamination procedures will typically be conducted on the Truck Wash Pad to ensure that cleaning residues are contained and collected for appropriate management.
10. When the incident has been brought under full control, and no longer presents a threat to human health or the environment, the EC will initiate appropriate remedial clean-up operations.

### **7.3.2 Sudden or Non-Sudden Releases or Spills of Hazardous Materials**

For purposes of this section, a “release or spill” is defined as 55 gallons or more of material (liquid or solid) outside of its container or tank, not on sacrificial soils or not contained within other containment structures. For materials on sacrificial soils or inside a containment structure, a spill or release will be considered to have occurred if the material poses a threat to other materials within the same containment unit.

In the event that a Reportable Quantity release or spill occurs at the facility, the EC will take the following actions:

1. Determine internal notification requirements and ensure such notifications are made;
2. Determine which facility operations might be impacted by emergency response activities and instruct those operations to cease or alter their operations, as necessary.
3. Assess the incident through observation, for the following criteria:
  - The nature and extent of the incident;
  - The location of the incident;
  - The nature and quantities of the materials involved (review of waste profiles, manifest, computer records, disposal records, truck placards, etc.);
  - Wind direction and relative speed;
  - The potential for short and long-term effects, with regards to human health and the environment;
  - The potential for fire and/or explosion; and
  - The need for additional outside assistance and/or evacuation.
4. If the EC determines that 1) the incident threatens human health and the environment outside the facility boundaries; 2) additional outside assistance is necessary to bring the incident under control; or 3) evacuation of the local area is necessary; the EC will establish communications with local emergency response agencies, as appropriate. The EC will also contact Nevada Department of Environmental Protection (NDEP) and the National Response Center (NRC), as necessary, in accordance with Section 7.7.0 of this plan. Emergency telephone numbers can be found in the EC Phone Number List (Appendix A).

5. The EC will direct all on-scene USEN response efforts and, as appropriate, coordinate activities involving outside agencies. The EC will direct the following response efforts, as appropriate and necessary:
  - If the incident involves the PCB processing area, all feed lines to the storage tanks will be closed;
  - If the surrounding materials could be reactive with the released waste, the EC will ensure they are removed to a safe location; and
  - If the incident involves leaking containers, the EC will ensure that the containers are appropriately managed.
6. Upon recovery from the emergency, the EC will ensure that all contaminated emergency equipment will be collected for decontamination. Decontamination procedures will typically be conducted on the Truck Wash Pad to ensure that cleaning solutions are contained and collected for disposal.
7. When the incident has been brought under full control, and no longer presents a threat to human health or the environment, the EC will initiate appropriate remedial clean-up operations.

### **7.3.3 Remedial Clean-Up Operations**

When the emergency has been brought under control and the threat to human life or the environment has been minimized, the EC will immediately initiate the following remedial actions, as appropriate, in order to restore the facility to operational readiness:

1. The entire area involved in the incident will be cordoned off and only those operations directly related to the remedial clean-up will be allowed in that area. No waste disposal, storage or treatment will be conducted in the cordoned-off area until clean-up operations are completed and permission to resume normal facility operations in the area is granted by the EC.
2. The EC will continue to monitor the area during remedial operations. Monitoring will be through observation and direct reading instruments, such as a portable six-gas photo ionization detector (PID), if necessary. Monitoring will be conducted for the presence of gas or vapor build-up, which could cause fire and/or explosion, if necessary.
3. The EC will ensure that all remedial operational personnel are properly equipped with necessary PPE.
4. All recovered waste, contaminated soil or other solid material resulting from the incident will be appropriately stored, treated, and / or disposed.
5. The EC will ensure that no waste that may be incompatible with the released or recovered material is treated, stored or disposed of in the affected area, until remedial clean-up procedures are completed.

6. When all spilled, released or fire-fighting liquids have been removed, the EC will have the area soil sampled and analyzed to ensure that the foreign material has been removed and no further contamination exists, as appropriate. The sampling will be as follows:
  - A minimum of two samples will be taken. This number will vary with the size and extent of the spill.
  - A sample will be taken from outside the periphery of the spill (background) and from the center of the spill (confirmation of clean-up).
  - Depth of samples will be determined by the EC based on visual observation.
  - Specific analysis will depend on materials involved.
7. Clean-up of any spill involving regulated PCBs will be conducted following the U.S. Environmental Protection Agency's (EPA's) Spill Clean-Up Policy.
8. All necessary reports will be submitted to the applicable agencies, informing them of the incident and all response measures taken to re-establish normal facility operations.
9. When remedial clean-up measures have been completed, the EC will ensure that the emergency equipment listed in the contingency plan is decontaminated, cleaned and fit for its intended use, before resuming normal operations. Other decontamination operations include:
  - Disposable PPE will be appropriately managed.
  - Respiratory protection equipment will be inspected and decontaminated, if necessary. Any required maintenance will be performed before reuse.
  - Heavy equipment (e.g., dozers, front-end loaders, forklifts, etc.) will be transported to the Truck Wash Pad for decontamination, if necessary.
  - Incidental equipment, such as fire extinguishers, shovels, pumps, and reusable PPE, will be removed to the Truck Wash Pad and thoroughly decontaminated, if necessary.
10. Liquids and other materials resulting from decontamination operations will be appropriately managed in accordance with the Waste Analysis Plan (WAP).
11. Fire extinguishers will be inspected in accordance with the Health & Safety Plan before being placed back in service.

#### **7.3.4 Earthquakes**

The USEN facility is located ~10 miles west of the Furnace Creek Fault Zone, and ~100 miles south of the Las Vegas Shear Zone. These are regionally active fault zones. The active lateral strike-slip Carrara Fault extends along the western front of the adjacent Bare Mountains, which lie east of the Site. A splay of the Carrara Fault extends under the eastern portion of the Site, forming a northwest-southeast zone with little surface expression. Site-specific studies by USEN identified the east and west boundaries of the fault zone. The USGS has concluded that the Carrara Fault has not been active within the last 10,000 years (Holocene) based on geomorphic evidence and the lack of

apparent offset in beds younger than late Pleistocene (40-85 thousand years). The site-specific studies support the USGS's conclusion of inactivity inactive, as indicated by undisturbed overlying sediments and the minimal surface expression. The following contingency response measures will be conducted in the event of significant seismic activity to the extent required by the EC:

1. Communication between key facility personnel and the EC will be immediately established;
2. Facility personnel will exit buildings, to an open area, if the building's structural integrity appears to be failing;
3. Facility personnel in operational areas will immediately halt or alter operations;
4. Heavy equipment operators will shut down equipment and egress to a safe open area;
5. Personnel located in the landfill will move away from the trench walls to the center open area and remain until the earthquake and associated initial after-shocks have dissipated;
6. Immediately following the earthquake and initial after-shocks, all personnel will proceed directly to the designated muster area;
7. The EC will account for all facility personnel;
8. Qualified personnel will administer first aid to injured personnel. Injured personnel will be transported for medical treatment, if necessary;
9. The EC will designate inspection teams and begin necessary measures to appraise facility damage;
10. Inspection of the facility will be conducted in an organized manner and will include the following areas:
  - The active landfill will be inspected for wall failure, cracks, exposed waste, severe depression in the floor and visible gas vapor emission.
  - Inactive cells will be inspected for cap integrity and fugitive visible emissions.
  - All access roads will be inspected for cracks and severe depressions.
  - Facility perimeter fencing will be inspected for integrity.
  - All electrical and utility systems will be inspected for operational effectiveness.
  - All facility equipment will be inspected for operational integrity.
  - All monitoring wells and sumps will be inspected for integrity.
  - The PCB processing area will be inspected for structural integrity of the building, flooring, valves, pipes, tanks, and containment controls. Signs of cracks, leaks or malfunction will be reported to the EC.
  - The propane tanks and ancillary equipment will be inspected for leaks, cracks or malfunction.
11. The EC will ensure that all inspection personnel are properly equipped with PPE.
12. In the event that a fire and/or explosion result from the earthquake, subsequent contingency response will be in accordance with Section 7.3.1 of this plan.

13. In the event that a release of hazardous material occurs, subsequent contingency response will be in accordance with Section 7.3.2 of this plan.
14. The EC will then initiate any remedial actions necessary to bring the facility up to operational readiness.
15. All necessary reports will be submitted in accordance with Section 7.7.0 of this plan.

#### **7.4.0 Evacuation Plan**

All emergencies require prompt and deliberate action. The EC will be responsible for determining if a facility evacuation is required. In the event that this determination is made, the following actions will be taken:

1. The emergency horns will be activated. This is the primary signal for immediate facility evacuation. In addition, radio communications will be established and the verbal order for evacuation will be given.
2. All facility personnel will immediately don proper PPE, if required, and proceed to the primary evacuation route (Appendix B).
3. All evacuations will be coordinated by the EC in such a manner as to minimize potential exposure (i.e., up-wind egress).
4. All facility visitors and contractors will exit the facility immediately, under the direction of the EC.
5. In the event that evacuation by the primary designated route is not possible (due to blockage by releases or fire), the EC will authorize the sacrifice of facility fencing by use of heavy equipment or motor vehicles to create alternate routes. All personnel evacuating the facility in this manner will immediately proceed to the evacuation muster area when clear of danger or to an alternate muster area designated by the EC.
6. When the evacuation is complete, the EC will immediately account for all facility personnel, visitors and contractors.
7. No attempt will be made to find personnel unaccounted for, if it involves the endangering of lives of others by re-entry into the facility.
8. Re-entry into the facility will only be made after the EC gives clearance.

#### **7.5.0 Equipment Requirements**

The facility will maintain sufficient safety and emergency equipment for immediate response to most emergency situations. All facility communications and alarm systems, fire extinguishers, spill control equipment and decontamination equipment will be inspected and maintained in accordance with the Facility Inspection Plan.

##### **7.5.1 Emergency Response Equipment**

For a more comprehensive list of emergency equipment, see Appendix D.

## **7.5.2 Safety Equipment**

The facility will maintain sufficient safety equipment to provide for immediate response to emergency situations.

### **7.5.2.1 Respiratory Protection**

Air purifying half- or full-face respirators with appropriate cartridges will be available and stocked in the Health and Safety Storage shed located adjacent to the Administration Building. A specific list of available equipment and locations include:

- Air purifying respirators (issued to each operational employee);
- Self-contained breathing apparatus (SCBAs) located in the H&S van, and Emergency Response (ER) Trailer;
- Spare bottles for SCBAs (located in the ER Trailer); and
- Cartridges for air purifying respirators (located in the H&S PPE Storage Shed).

### **7.5.2.2 Personal Protective Equipment**

Available PPE, in addition to the PPE issued to operational employees, includes:

- Tyvek™ outer garments (located in the Trench Shed, PCB Building, Maintenance Building, ER Trailer, and H&S PPE Storage Shed);
- Chemical-resistant suits (located in the H&S PPE Storage Shed and ER Trailer);
- Chemical-resistant gloves (located in the Trench Shed, Site Laboratory, Maintenance Building, and H&S PPE Storage Shed);
- Face shields (located in the PCB Building, and H&S PPE Storage Shed); and
- Chemical resistant over-boots for safety shoes (located in the PCB Building, H&S PPE Storage Shed and ER Trailer).

### **7.5.2.3 Fire Extinguishers**

Portable fire extinguishers, rated for class "ABC" fires, are available at multiple locations on-site.

Specific lists of units (and respective locations) include:

- ABC units on all heavy equipment;
- ABC units stored on the loading dock;
- 2 – Compressed foam units: one trailer mount at Pans 4 and 5, and one on the Landfill Gator.
- Three foam suppression units, portable, located at the PCB Building, the Stabilization Control Room and the storage shed at the stabilization change room;
- Three Fire Rover systems, one at the PCB Building, one at the Container Management Building and one at the CMU #19 Building.

#### **7.5.2.4 Heavy Equipment and Vehicles**

The facility routinely utilizes multiple pieces of heavy equipment and vehicles (such as trucks) to support on-site operations and this equipment is available for emergency response efforts. Typical equipment used on-site includes track-hoes, bulldozers, water trucks, forklifts, etc. Although this equipment is available on-site, it is not for “emergency response” purposes, per se, and is routinely exchanged for other similar equipment when its economic life is complete. Therefore, although this equipment is on-site, it is not listed here.

#### **7.5.2.5 Spill Control and Response Equipment**

A specific list of spill control and response equipment, in addition to on-site heavy equipment, includes:

- Recovery drums (inside the PCB Building and outside the CMS Buildings);
- Absorbent material for containment and solidification (inside the PCB Building and CMS Buildings);
- Spill control pads (PCB Building and Main and Satellite laboratory); and
- Shovels (Throughout waste storage and processing areas).

#### **7.5.2.6 Decontamination Equipment**

Decontamination of contaminated equipment will typically take place at the Truck Wash Pad, and all decontamination run-off will be collected in the Truck Wash Pad holding tank. Additional equipment typically available for decontamination includes:

- High pressure and steam cleaning units (kept at the Truck Wash Pad);
- Portable high pressure hot water washer;
- Decon water soluble cleaning solution (PCB Buildings);
- Sponges and mops (PCB Building), and
- Portable and fixed emergency deluge showers and eye wash stations (fixed units located at the CMS Buildings, PCB Building, Stabilization Area, Truck Wash Pad, Trench Shed, and Lab).

#### **7.5.2.7 First Aid Supplies**

Typically available first aid supplies include:

- A complete emergency trauma kit (located in the ER Trailer, Administration Building, PCB Building, CMS Office Trailer, Trench Shed, Maintenance Shop, Operations Change Room and H&S Van.);

- Basic first aid kits (located in the Administration Building, Satellite Lab, Maintenance Shop, CMS Buildings, PCB Building, Retail Office, Stabilization Office);
- One stretcher (located in the H&S Van); and
- One burn pack (located in the H&S Van).

#### **7.5.2.8 Water for Fire Control**

The facility maintains a 20,000 gallon water storage tank located adjacent to the PCB building, and a water storage pond located west of the main access gate.

Other fire fighting capabilities includes two mechanical foam spraying units. One is located in Trench 13 mounted in the bed of a 4-wheel utility vehicle, and the other is located outside of Treatment Pans 4 and 5..

#### **7.5.2.9 Internal Communication Systems**

Internal communications consist of three (3) independent systems. The primary system is an emergency warning claxon horn. The system consists of three (3) high-intensity warning horns, one (1) located at the PCB Building, one (1) at the CMS Building, and one (1) at the Administration Building. The second system consists of radio units. This system consists of a minimum of eight (8) hand-held units located throughout the facility. All radios are interfaced for monitoring and communication purposes. The EC will monitor at least one unit at all times during normal facility operations. The third system consists of a telephone system.

#### **7.5.2.10 External Communication Systems**

External communications for summoning outside emergency assistance will be accomplished by telephone. There will be a minimum of six (6) telephones readily available for this purpose with a Contingency Plan Notification List posted in the immediate vicinity; which includes each ECs and Response and Regulatory Agencies' contact information. One (1) telephone will be located in the facility laboratory, one (1) in the Facility Manager's office, one (1) in the break area, and three (3) in the Administration Building.

### **7.6.0 Plan Distribution/Coordination Agreements**

The following facilities and agencies are in possession of copies of the Emergency Coordinator Phone Number List (Appendix A.) These agencies were invited to participate in an orientation intended to familiarize response personnel with the facility layout, properties of the wastes handled at the facility and associated hazards. Each agency was asked to review and comment on the plan and establish specific actions that they will take in response to an emergency.

1. Beatty Volunteer Fire/Rescue;
2. Beatty Ambulance Service;
3. Beatty Substation Nye County Sheriff; and
4. Mercy Air Ambulance Service.
5. Nye County Emergency Services/

A copy of the coordination agreement letter provided to each agency is included as Appendix C. In addition to external circulation, all US Ecology employees have access to the Contingency Plan which is kept in the Compliance Library at the Beatty Facility.

### **7.7.0 Reports**

As soon as possible after implementation of the Contingency Plan, the Emergency Coordinator, or designee, will record the time, date, and details of the incident. USEN will orally report to the NDEP any incident requiring implementation of the Contingency Plan. The NDEP and the NRC will be notified of any incident involving a release to the environment of hazardous waste, pollutant or contaminant in a quantity equal to, or greater than the reportable quantity specified by 40 CFR Part 302.

The oral reports described above will be provided as soon as possible after becoming aware of the release, but no later than 24 hours following the incident. However, the EC must notify the NDEP that the facility is in compliance with the following items before operations are resumed in the affected area(s) of the facility:

1. No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
2. All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use before operations are resumed. In this case, the EC may substitute equivalent emergency equipment in the affected area while repairing, replacing, or recharging used emergency response equipment.

A written report providing details on any incident requiring implementation of the Contingency Plan will be submitted to the NDEP Administrator within 15 days. The following information will be included in the written notification to the Administrator:

1. Name, address and telephone number of the owner/operator of the facility;
2. Name, address and telephone number of facility;

3. Date, time, and type of incident (e.g.; fire, explosion);
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. Estimated quantity and disposition of recovered material that resulted from the incident.

#### **7.8.0 Training**

Emergency Response Training including HAZWOPER Training is provided to all Management Staff and the EC. All Site responders are trained to the HAZWOPER Technician Level. This training is performed on the required refresher frequency and all records are maintained in the administration building. The remainder of the staff receives training on the alarm protocol and proper evacuation procedure training upon hiring and annual refresher training. Records are maintained in the Administration Building.

#### **7.9.0 Plan Modification**

The Emergency Coordinator, or designee, may find it necessary to adapt the Contingency Plan to a specific emergency situation in order to adequately protect human health or the environment. Annual plan reviews will be performed to address any updates that may need to be made to the Contingency Plan. Records of each review are on the cover page of the plan including: person reviewing, review date and comments regarding the updates to the plan. As part of the review process, local fire and ambulance services review the site on an annual basis. In addition, the Contingency Plan will be reviewed and amended, if necessary, whenever:

1. The facility permit is revised;
2. The plan fails in an emergency;
3. The facility changes – in its design, construction, operation, maintenance, or other circumstances – in a way 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;
4. The list of emergency coordinators changes; or
5. The list of emergency equipment changes.

Copies of the modified plan will be distributed as described in Section 7.6.0.

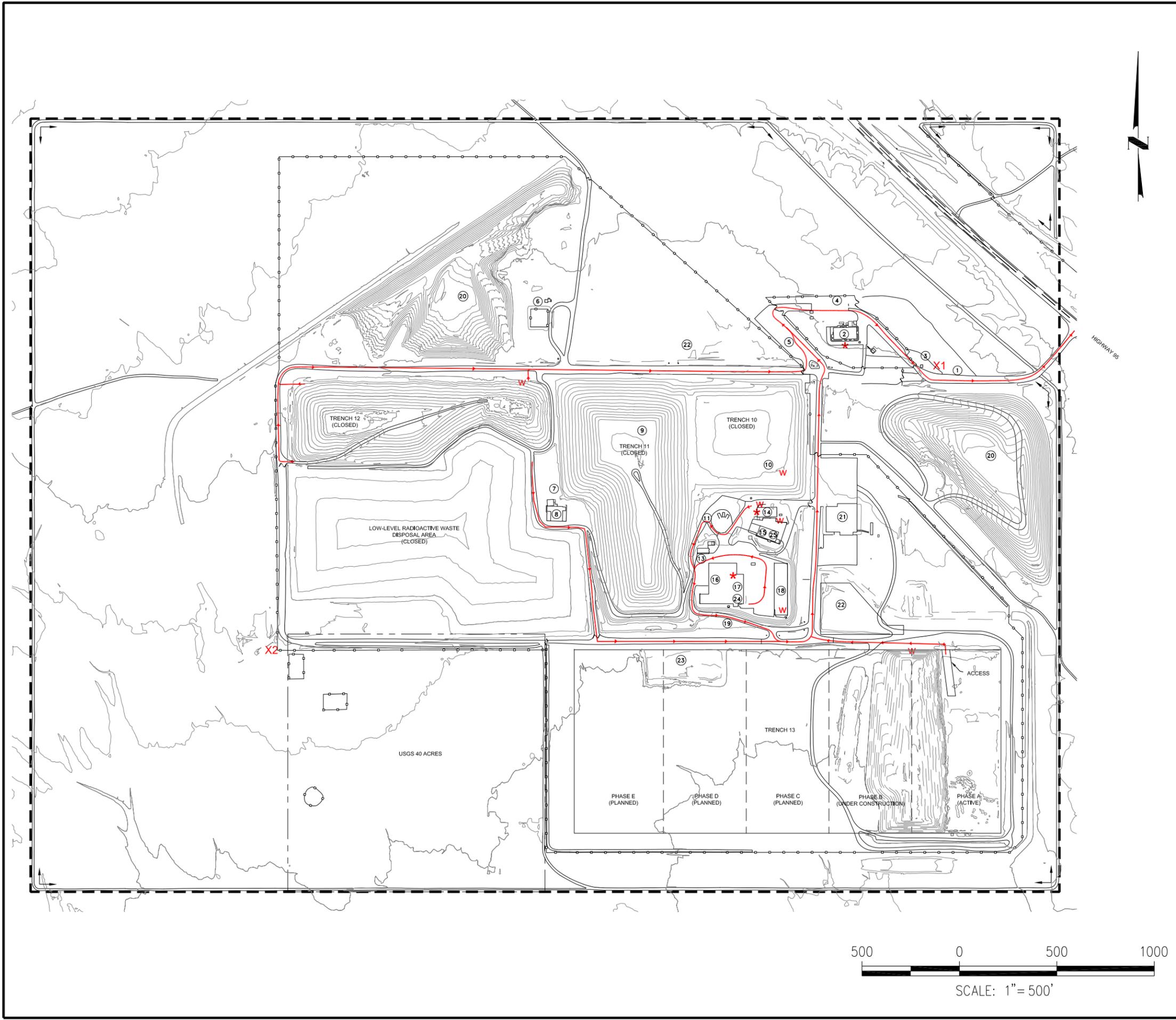
**Appendix A**

**List of Emergency Coordinators**

**LIST OF EMERGENCY COORDINATORS  
US ECOLOGY – BEATTY, NEVADA**

<b>EMERGENCY COORDINATOR (EC)</b>	<b>NAME</b>	<b>JOB TITLE</b>	<b>STREET ADDRESS</b>	<b>CONTACT NUMBERS</b>	
Primary Coordinator	Bryan Greager	General Manager	8310 Coke Street Las Vegas, NV 89131	Cell	702-303-0899
1 <sup>ST</sup> Alternate	Ron Browning	H & S Manager	1100 N 'A' Ave, #B-21 Beatty, NV 89003	Cell	775-277-0426
2 <sup>nd</sup> Alternate	Franklin Irelan (Jake)	Operations Manager	5250 Wheatland Pahrump, NV 89061	Cell	702-764-1905
3 <sup>rd</sup> Alternate	Shannon Moore	Stabilization Supervisor	1730 Bridger Street Pahrump, NV 89048	Cell	702-253-4689

**Appendix B**  
**Evacuation Routes Map**



**LEGEND**

- ① MAIN SITE ENTRANCE
  - ② ADMINISTRATION OFFICE AND MAIN LABORATORY
  - ③ SECURITY AND DRIVERS TRAILER
  - ④ INBOUND AND OUTBOUND SCALES
  - ⑤ TRUCK SAMPLING STATION
  - ⑥ WATER STORAGE
  - ⑦ FUEL STORAGE
  - ⑧ MAINTENANCE SHOP
  - ⑨ WEATHER STATION AND TRENCH 11 LYSIMETER
  - ⑩ DRY HAZARDOUS WASTE STORAGE AREA 3
  - ⑪ OUTDOOR TREATMENT PANS
  - ⑬ OPERATIONS OFFICE
  - ⑭ PCB PROCESSING AREA AND STORAGE/PCB TANK FARM
  - ⑮ AEROSOL RECYCLING UNIT
  - ⑯ CONTAINER MANAGEMENT AND STORAGE BUILDING
  - ⑰ INDOOR TREATMENT PANS
  - ⑱ DRY HAZARDOUS WASTE STORAGE AREA 2
  - ⑲ EVAPORATION TANK (TRUCK WASH PAD)
  - ⑳ SOIL STOCKPILE
  - ㉑ CONTAINER MANAGEMENT STORAGE BUILDING AND OFFICE TRAILER
  - ㉒ TRUCK STAGING AREA
  - ㉓ CLAY REAGENT STORAGE
  - ㉔ SATELLITE LABORATORY
  - ㉕ DRUM RE-USE MANAGEMENT AREA (PROPOSED)
- — — — — PROPERTY LINE
  - — □ — □ — □ — □ SECURITY FENCE
  - ∩ ACCESS GATE
  - — — — — INTERNAL ROADWAYS
  - - - - - USGS 40 ACRES
  - — — — — MAJOR CONTOUR (5 FEET)
  - └┘ TORTOISE FENCE
  - ➔ PRIMARY EVACUATION ROUTE
  - X1 PRIMARY MUSTER AREA
  - X2 SECONDARY MUSTER AREA
  - \* PULL ALARM LOCATION
  - W WINDSOCK LOCATION

Drawing provided at 11 inch by 17 inch for convenience. Drawing at 24 inch by 36 inch is available upon request.

0	ISSUED FOR REGULATORY REVIEW	05/14/19
1	SITE MODIFICATIONS	05/08/20
2	SITE MODIFICATIONS	10/16/20



US ECOLOGY NEVADA INC.  
HAZARDOUS WASTE MANAGEMENT FACILITY  
BEATTY, NEVADA



**EVACUATION PLAN**

**Appendix C**  
**Coordination Agreement Letters**



P.O. Box 578, Beatty, NV 89003  
P 800.239.3943 F 775.553.2942

*Make copy for  
disposal to  
submit to me  
Bill 4-18-22*

April 01, 2022

Nye County Sheriff  
(Beatty Sub Station)  
1520 E. Basin Avenue  
Pahrump, Nevada 89060

Dear Sir/Madam,

As you are aware, US Ecology operates a chemical waste disposal facility near the location of your organization. The U.S. Environmental Protection Agency (USEPA) regulations pertaining to hazardous waste disposal require US Ecology to familiarize local emergency response personnel with our site operations and obtain verification from you that your organization will respond to any request for emergency assistance.

To acknowledge that you will provide such services, please have a representative of your agency date and sign the appropriate spaces provided below then return letter to US Ecology.

Also, by this letter, US Ecology invites your agency to participate in an orientation session, held at your convenience, dealing with the facility layout, potential hazards and special situations which could be encountered during an emergency response. Attached is a copy of US Ecology's **Emergency Contingency Plan** dated May 2021 for your review. Should you be interested in an orientation or if you require additional information regarding this notice, please contact Amanda Rasmussen at 800-239-3943 x 4112.

Sincerely,

Bryan Greager  
General Manager

Enclosure

Cc: Ms. Maureen Godbout, P.E., Staff Engineer-NDEP  
Chrono - US Ecology

.....

The Nye County Sheriff's Office will respond to any US Ecology request for emergency assistance.

Date: 4-8-22

Signed: [Signature]

Decline orientation session



P.O. Box 578, Beatty, NV 89003  
800.239.3943 775.553.2942

April 01, 2022

Mercy Air Ambulance  
1541 E. Calvada Blvd  
Pahrump, NV 89048-5807

Dear Sir/Madam,

As you are aware, US Ecology operates a chemical waste disposal facility near the location of your organization. The U.S. Environmental Protection Agency (USEPA) regulations pertaining to hazardous waste disposal require US Ecology to familiarize local emergency response personnel with our site operations and obtain verification from you that your organization will respond to any request for emergency assistance.

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Sincerely,

Bryan Greager  
General Manager

Enclosure

Cc: Ms. Maureen Godbout, P.E., Staff Engineer-NDEP  
Chrono - US Ecology

The MERCY AIR SERVICE will respond to any US Ecology request for emergency assistance.

Date: 4.7.2022

Signed:

Decline orientation session



P.O. Box 578, Beatty, NV 89003  
P 800.239.3943 F 775.553.2942

April 1, 2022

Beatty Ambulance Service  
PO Box 875  
Beatty, Nevada 89003

Dear Sir/Madam,

As you are aware, US Ecology operates a chemical waste disposal facility near the location of your organization. The U.S. Environmental Protection Agency (USEPA) regulations pertaining to hazardous waste disposal require US Ecology to familiarize local emergency response personnel with our site operations and obtain verification from you that your organization will respond to any request for emergency assistance.

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Sincerely,

Bryan Greager  
General Manager

Enclosure  
Cc: Ms. Maureen Godbout, P.E., Staff Engineer-NDEP

.....  
The BVAS will respond to any US Ecology request for emergency assistance.

Date: 4-2-22

Signed: Michael Howard For Allison Henderson

Decline orientation session



P.O. Box 578, Beatty, NV 89003  
P 800.239.3943 F 775.553.2942

April 01, 2022

Nye County Volunteer Fire Department  
PO Box 113  
Beatty, Nevada 89003

Dear Sir/Madam,

As you are aware, US Ecology operates a chemical waste disposal facility near the location of your organization. The U.S. Environmental Protection Agency (USEPA) regulations pertaining to hazardous waste disposal require US Ecology to familiarize local emergency response personnel with our site operations and obtain verification from you that your organization will respond to any request for emergency assistance.

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Sincerely,

Bryan Greager  
General Manager

Enclosure

Cc: Ms. Maureen Godbout, P.E., Staff Engineer-NDEP  
Chrono - US Ecology

.....  
The BVFD will respond to any US Ecology request for emergency assistance.

Date: 04/02/2022

Signed: Richard Farner

Decline orientation session

Unequaled service. Solutions you can trust.

[USEcology.com](http://USEcology.com)



P.O. Box 578, Beatty, NV 89003  
P 800.239.3943 F 775.553.2942

April 01, 2022

Nye County Emergency Management  
1510 Siri Lane, Ste. 1  
Pahrump Nevada 89060

Dear Sir/Madam,

As you are aware, US Ecology operates a chemical waste disposal facility near the location of your organization. The U.S. Environmental Protection Agency (USEPA) regulations pertaining to hazardous waste disposal require US Ecology to familiarize local emergency response personnel with our site operations and obtain verification from you that your organization will respond to any request for emergency assistance.

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Sincerely,

Bryan Greager  
General Manager

Enclosure

Cc: Ms. Maureen Godbout, P.E., Staff Engineer-NDEP  
Chrono - US Ecology

.....  
AVFRS / Nye County

The \_\_\_\_\_ will respond to any US Ecology request for emergency assistance.

Date: 4/20/22

Signed:

Decline orientation session

**Appendix D**  
**List of Emergency Equipment**

**List of Emergency Equipment (Typical)**

<b>Equipment</b>	<b>Location</b>	<b>Physical Description / Capabilities</b>
Protective Outer Garments	H&S PPE Storage Shed, Operations Storage Shed	Level A and B response suits located in ERT Trailer and Safety Storage Shed.
Gloves	H&S PPE Storage Shed, Operations Storage Shed	Chemical resistant gloves
Face Shields	PCB Bldg., Laboratory, and H&S PPE Storage Shed	Hard plastic shield for protecting eyes from splashes
Booties / Rubber Boots	H&S PPE Storage Shed and ER Trailer	Water or chemical resistant boots or covers
Fire Extinguishers	Heavy Equipment, Stabilization Area, CMS Bldgs., PCB Bldg., Maintenance Shop, and Landfill	Various sizes and types for fighting incipient fires
Overpack Drums	Unloading areas for PCB Bldg. and CMS Bldgs.	For containing waste, spill residues
Absorbents / Pozzolons	Stabilization Area, PCB Bldg.	These materials are soils or materials for sorption of liquids
Spill Control Pads	PCB Bldg., CMS Bldgs. & Lab	These materials are for absorbing liquids
Emergency Showers & Eye Wash Units	Various locations	Deliver water for drenching contaminated personnel