

SECTION F

PROCEDURES TO PREVENT HAZARDS

The information provided in this section is submitted in accordance with the requirements of 40 CFR 270.14 and 264.14. Other regulations addressed to complete this section include 264.15, 264.17, 264.174, 264.194, and 264.254.

This section addresses the following subject areas (referenced below): general security, inspection schedule, request for a waiver of preparedness and prevention requirements, spill prevention, containment, and countermeasures plan; and prevention of accidental ignition or reaction of ignitable, reactive, or incompatible wastes.

F-1 Security (270.14(b)(4); 264.14)

Security actions are addressed below in the following subsections.

F-1a Security Procedures and Equipment (270.14(b)(4); 264.14)

In addition to the general security provisions of fencing and guards discussed below, other features contribute to the safety and security of the facility. Ample lighting is provided throughout the site. An emergency siren is located in the treating room and the treating supervisor/emergency coordinator wears a cell phone for immediate communication. An internal telephone system is provided between the upper yard office and the main office phones.

F-1a(1) 24-hour Surveillance System (270.14(b)(4); 264.14)

Security at William C. Meredith Company, Inc. (WCM) is maintained by company operators and supervisors on weekdays 24 hours per day. Company watchmen are employed on weekends to primarily monitor entry and exit from the active portion of the facility and provide security measures within the plant premises 24 hours per day. The main entrances at the east and south end of the facility lead to the yard offices. Treating operators work adjacent to and overlooking the surface impoundment area 24 hours a day, five days a week. Weekend watchmen normally work a 12 hour shift with a crew of two guards per day. During each shift, the guard makes a walkthrough of the facility at varying intervals to check the area.

F-1a(2)(a) Barrier (270.14(b)(4); 264.14)

The facility is enclosed with an eight-foot-high wire mesh fence in all areas except the company parking lot and the Southern Railway track right of ways. The fence has openings for driveways located at the southern end of the facility, the east side off Lawrence Avenue, and at the northeast end of the facility off Empire Avenue.

The first two entrances are considered main entrances. The surface impoundment is surrounded by a five foot high fence as a barrier and is kept locked. The surface impoundment is closed and capped.

F-1a(2)(b) Means to Control Entry (270.14(b)(4); 264.14)

As discussed in Section F-2a(1), entry to the facility is controlled at the yard offices at the entrances.

F-1a(3) Warning Signs (270.14(b)(4); 264.14)

“No Trespassing” signs in English which are legible from a distance of 25 feet are posted at all fence gates and several other fence locations around the perimeter of the property. Signs which are legible from a distance of 25 feet are posted around the active portion of the facility. These signs are visible from all angles of approach and bear the legend “Danger Do Not Enter Authorized Personnel Only.” In addition, “No Smoking” signs which are legible from a distance of 25 feet are located in the treating area. Signs on the fence around the regulated unit read “Danger – Do Not Enter – Authorized Personnel Only”.

F-1b Waiver (270.14(b)(4); 264.14)

WCM does not request a waiver of the requirements stated in Part 264.14 (a) (1) and (2) regarding injury to intruder and violations by intruder.

F-2 Inspection Schedule (270.14(b)(5); 264.15)

Inspection is required for monitoring and safety emergency equipment, communication and alarm systems, decontamination equipment, security devices, and operating and structural equipment, as described in the following subsections.

F-2a General Inspection Requirements (270.14(b)(5); 264.15(a),(b); 264.33)

WCM conducts regular inspections of the facility for equipment malfunctions, structural deterioration, operator errors, and discharges that could cause or lead to the release of hazardous waste constituents and adversely affect the environment or threaten human health.

F-2a(1) Types of Problems (270.14(b)(5); 264.15(b)(3))

Pursuant to 40 CFR 264.15(b)(1) (391-3-11-.10(2) of the Rules); “The owner or operator must develop and follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards.”

Appendix F-1 presents the schedule for inspecting monitoring equipment, safety and emergency equipment, and the surface impoundment storage area. The items listed in

the table are considered important because of their role in preventing, detecting, or responding to environmental or human health hazards and covers security devices. Provided with each item is a list of problems normally encountered.

F-2a(2) Frequency of Inspection (270.14(b)(5); 264.15(b)(4))

A recommended frequency of inspection for each item is also provided in Table F-1.

F-2a(3) Schedule of Remedial Action (270.14(b)(5); 264.15(c))

Remedy for any deterioration or malfunctions of equipment or structures observed during the facility inspections will be corrected on the following schedule:

(1) Where a hazard is imminent or has already occurred, remedial actions will be taken immediately to ensure that the problem does not lead to an environmental or human health hazard.

(2) Where an inspection item is not an imminent hazard, remedial action will be taken as soon as practicable to ensure that the problem does not lead to an environmental or human health hazard.

The site contingency plan has been submitted under separate cover.

F-2a(4) Inspection Logs (270.14(b)(5); 264.15(d))

An inspection log is maintained for each calendar year in a three-ring binder that is subdivided by sections for each area/equipment. After an inspection, each log sheet is filed in the binder according to area/equipment, which provides a case history of a particular item. The inspection log notebook is always kept with the inspection schedule in the General Manager's office. As required, records of inspection are kept for at least three years from the date of inspection. A copy of the inspection log sheets may be found at the General Manager's office. Blank inspection log forms are included as Appendices F-1 through F-9 provided following the text.

F-2b Specific Process Inspection Requirements (270.14(b)(5))

Inspections of various processes at the facility are described in the following subsections.

F-2b(1) Container Inspection (270.14(b)(5); 264.174)

Inspections of container storage (hazardous waste roll off) are performed and recorded daily. Inspections include a check for leakage or filter cake dropped outside of the roll off in the secondary containment area.

F-2b(2) Tank System Inspection (270.14(b)(5); 264.195)

Tank inspections are not applicable since hazardous waste is not stored in the tanks.

F-2b(3) Waste Pile Inspection (270.14(b)(5); 270.18 (d); 264.254(b))

Waste pile inspection is not applicable since hazardous waste is not stored in waste piles.

F-2b(4) Surface Impoundment Inspection (270.14(b)(5); 270.17(c); 264.226(b),(c))

Inspections of the surface impoundment area (closed and capped) are conducted per the inspection schedule provided in Table F-1. Results of each inspection are recorded on inspection log sheets in Appendix F-3. Information requested on the log sheets includes the inspector's name, date and time of inspection, item of inspection, typical problems encountered, status of the item, observations, and the date and nature of repairs and remedial action. Typical problems encountered with each item of inspection, included in the inspection schedule, are provided on the log sheet as a reminder to the inspector and to ensure a complete inspection. The inspector is required to check the status of each item and indicate whether its condition is acceptable or unacceptable. If the status of a particular item is unacceptable, appropriate and complete information is recorded, including date and nature of repairs and remedial action.

Since the impoundment is closed, Subsections F-2b(4)(a)-(c) and (5) – (10) do not apply.

F-2b(11) Drip Pad Inspection (270.14(b)(5); 264.574)

Visual inspections are performed as outlined in Appendix F-6.

F-3 Waiver or Documentation of Preparedness and Prevention Requirements (270.14(b)(5); 264.32(a)-(d))

The applicant does not wish to request a waiver of the preparedness and prevention requirements under 40 CFR 264 Subpart C. Requirements of this Subpart are primarily addressed in Section D, Section F, and Section G of this application.

F-3(a) Equipment Requirements (270.14(b)(5); 264.32)

Pursuant to 40 CFR 270.14(b)(5) and 264.32 (391-3-11-.11(3)(h) and 391-3-11-.10(2) of the Rules, a list of required emergency equipment is included in Appendix F-10.

F-3(b) Aisle Space Requirements (270.14(b); 264.35)

Aisle space is provided by plant roadways which are adjacent to the east, north, and west sides of the surface impoundment. Emergency vehicles can drive to the edge of the dike.

F-3(c) Documentation of Arrangements with Emergency Agencies (270.14(b); 264.37)

F-3(c)(1) Police/Fire Department (270.14(b); 264.37(a)(1))

WCM has arrangements with the City of East Point Police and Fire Departments to provide needed services at the wood preserving plant site. Annually the site revises and submits to the East Point Fire Department the EPA Right to Know Section 312 Tier 2 reporting for hazardous chemicals including plant layouts and locations of hazardous chemicals and hazardous wastes.

F-3(c)(2) Emergency Response Teams (270.14(b); 264.37(a)(2),(a)(3))

WCM has provided the State of Georgia S.E.R.C. and the Atlanta Fulton County LEPC with site specific environmental information. Annually the site revises and submits to both emergency response organizations the EPA Right to Know Section 312 Tier 2 reporting for hazardous chemicals including plant layouts and locations of hazardous chemicals and hazardous wastes.

The site has arrangements with environmental cleanup and waste disposal company Clean Harbors for any needed environmental services. The site has arrangements with abutting contractor Mullins Brothers Paving to supply heavy earth moving machinery, dump trucks or crushed granite if needed in an environmental emergency.

F-3(c)(3) Local Hospitals (270.14(b); 264.37(a)(4))

WCM has arrangements with the Wellstar Atlanta Medical Center South emergency room located approximately two miles east of the site to treat any personnel exposed to environmental contamination at the site. The site has furnished the emergency room with information on the hazardous chemicals used at the site.

F-3(c)(4) Document Agreement Refusal 270.14(b);264.37(b)

No state or local authorities declined to enter into arrangements for environmental services if needed.

F-4 Preventive Procedures, Structures, and Equipment (270.14)

F-4(a) Loading/Unloading Operations (270.14(b)(8)(i))

All handling of hazardous waste is done inside the dike area surrounding the hazardous waste roll-off and filter press. Trucks load the roll-off while on the secondary containment area.

F-4(b) Runoff (270.14(b)(8)(ii))

Runoff from the chemical storage area and treating area flows into the concrete containment area and after separation the excess water is pumped to the city sewer through the oil separator via the wastewater treatment system. The swale surrounding the surface impoundment prevents drainage into the surface impoundment. Runoff from

all other areas of the facility is diverted through drains and culverts to the natural depression/intermittent drainage in the northwest corner of the property. A small, intermittent flow creek is formed at this point from the discharge of a 36-inch City of East Point culvert that drains the catch basins on Lawrence Avenue and Main Street. WCM is not located in a 100 year floodplain and due to a 60 foot drop in elevation across the length of the property, the occurrence of a flood is very unlikely. Further procedures are discussed in the Emergency Procedures section of the Contingency Plan available for review at the facility.

F-4(c) Water Supplies (270.14(b)(8)(iii))

Groundwater is not used as a private or public water supply at the facility or surrounding properties. Secondary containment areas are used to prevent contaminants from discharging into the subsurface. Monitoring wells are used to sample groundwater to detect any subsurface impact to the uppermost aquifer (see Section E). Any new processing equipment installations will include concrete diking, sumps, sump pumps and holding tanks to further prevent ground contamination.

F-4(d) Equipment and Power Failure (270.14(b)(8)(iv))

In the event of a power interruption, all plant operations are shutdown. After shutdown, supervisors, maintenance personnel and operators will check for malfunction and equipment failures. The East Point Electric department and contract electricians will be contacted immediately for assistance, as needed. Refer to the Contingency Plan for more details (available for review at the facility).

F-4(e) Personnel Protection Equipment (270.14(b)(8)(v))

General information on the major chemical components of the wastes in the surface impoundment area is provided on Safety Data Sheet (SDS) forms in the labeled appendix. The SDS sheets present information on various chemicals regarding toxicity, fire and explosion hazards, protective equipment recommendations, and first aid. Available protective equipment is presented under Emergency Equipment and Provisions of the Contingency Plan, available for review at the facility.

Use of protective equipment is covered in the initial and annual Personnel Training Programs (see Section H), which satisfies the Occupational Safety and Health Standards of 29 CFR Part 1910 Subpart I – Personal Protective Equipment.

F-4(f) Procedures to Minimize Releases to the Atmosphere (270.14(b)(8)(vi))

Hazardous waste is created by (1) cleanup of treating area equipment (tanks, sumps, drip pans, treating cylinders, and contaminated soil) or (2) filter pressing to remove hazardous waste as a dry filter cake.

All hazardous waste generated is put into a lined, covered steel roll-off box and sent to a hazardous waste disposal site each 90 days or less. Air emissions are minimized by only

opening the closed roll-off top to add waste to the box and then immediately replacing the cover. Any air emissions while the waste box is open are assumed to be minimal.

F-5 Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes
(270.14(b)(9))

This section is not applicable as the facility has no ignitable, reactive or incompatible wastes. Welding or burning is done in the chemical storage area, wood treating facility building, or wood treating cylinder area only under the direction of the treating supervisor or general manager. Fire extinguishers, fire hoses, and fire watch are provided. Standby fire truck and sand cover are provided if required.