MOVE YOUR ENVIRONMENT FORWARD

HAZARDOUS WASTE CONTINGENCY AND EMERGENCY ACTION PLAN

CS Clean Systems
2453 West Parkside Lane, Suite 150
Phoenix, AZ 85027

Prepared For:

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Prepared By:

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HRP #: CSC0011.PS

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1.0 EXECUTIVE SUMMARY

Executive Summary

This Emergency Action and Contingency Plan has been updated for CS Clean Systems (CS Clean) in order to comply with State and Federal Hazardous Waste Regulations and Occupational Safety and Health Administration (OSHA) Emergency Response Plan regulations. The purpose of this plan is to act as a guide during an actual emergency, to minimize hazards to human health and the environment from fires, explosions, and other releases, and to familiarize local emergency response personnel with the types and locations of materials kept onsite.

Contingency Plan Submittal

A copy of this updated Contingency Plan must be submitted to the following agencies:

- Local Police Department
- Local Fire Department
- Local Hospital/Urgent Care
- Local Emergency Planning Committee (LEPC)
- State Emergency Response Commission (SERC)

Implementation of the Contingency Plan

The Contingency Plan should be implemented under any of the following situations:

- Fire/Explosion
- Spill/Release
- Flood
- Other Emergencies

Initial Notifications

The following people are responsible for implementing this plan (See **Section 3.2** for details.):

- Jacob Newman – Emergency Coordinator
    - 24-Hour Phone: (360) 852-6410
- Jason Dugay – Alternate Emergency Coordinator
    - 24-Hour Phone: (203) 648-0881
- Adam Furphy – Alternate Emergency Coordinator
    - 24-Hour Phone: (845) 337-7385

Emergency Procedures

Emergency procedures are in the sections noted below:

- Immediate Procedures (**Section 3.4.1**)
- During Emergency (**Section 3.4.2**)
- Follow-up Procedures (**Section 3.4.3**)

Control Procedures

Emergency Procedural Flow Charts for the following situations are included in the sections noted below:

- Fires/Explosions (**Section 3.5.4**)
- Spills/Releases (**Section 3.5.5**)

Emergency Equipment

The locations of emergency equipment at CS Clean can be found on **Figure 3** and are posted around the facility. **Table 3** describes the facility's emergency equipment as well as its uses and locations.

Evacuation

The Emergency Coordinator is responsible for determining which emergency situations require plant evacuation. **Figures 1** and **3** show CS Clean evacuation routes and **Section 3.7** includes procedural details.

Reporting of Emergency Incidents

Immediately after an environmental emergency the event must be reported to the Commissioner of the Arizona Department of Environmental Protection (ADEQ) as well as the Regional Administrator of the U.S. Environmental Protection Agency (EPA). A written report must be filed within fifteen days of an environmental emergency, the Emergency Coordinator must report to ADEQ and EPA. Any work-related accidents that result in the death of an employee must be reported to OSHA within eight hours of the incident occurring and report any employee in-patient hospitalization, amputation, or loss of an eye within twenty-four hours.

Locations of Contingency Plan

Copies of this Contingency Plan are maintained at the facility on the internal CS Clean internet page. Access can be granted at the Administrative Assistant's office and the Environmental, Health and Safety Director's office.

Contingency Plan Revision

This Contingency Plan must be revised under any of the following conditions (but may not be limited to):

- Regulations are revised;
- Plan fails in an emergency;
- Facility changes (design, operation) which increases the potential of a fire, spill, or release;
- List of emergency coordinators changes; or
- List of emergency equipment changes.

2.0 INTRODUCTION

2.1 General Background

This combined Hazardous Waste Contingency and Emergency Response Plan has been created to help eliminate confusion for facility first responders during an emergency and to avoid duplication in the preparation and use of emergency response plans at CS Clean. The use of this single plan should also improve coordination between facility response personnel and local, state, and federal emergency response personnel.

The purpose of this plan is to comply with OSHA and EPA regulations under 29 Code of Federal Regulations (CFR) 1910.38, 29 CFR 1910.120(l), and 40 CFR 262.260, respectively, as well as the Large Quantity Generator (LQG) Hazardous Waste Contingency Plan regulations under Sections R18-08-262, and Treatment, Storage, and Disposal facility (TSDF) requirements under 40 CFR 270.14(b)(7), 264.56, and Arizona Administrative Code (AAC) R-18-8-264. The goal of the combined plan is three-fold:

1. To act as a guide during actual emergency situations;
2. To minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soils, or surface water; and
3. To familiarize local emergency response personnel (i.e., police, fire, and rescue departments, hospital, and governmental personnel) with the types of material handled at the facility and internal emergency response procedures.

CS Clean, located at 2453 West Parkside Lane, Suite 150, Phoenix, Arizona, is a hazardous TSDF, generator of hazardous waste, and transfer of hazardous secondary materials (HSM) for reclaim. The primary role of the facility is to service gas abatement systems (columns), treatment, and storage of the waste contained in the columns. The North American Industry Classification System (NAICS) code for the facility is 333413 (Industrial/Commercial Fan and Blower and Air Purification Equipment Manufacturing) and the Standard Industrial Classification (SIC) code is 3564 (Air Purification Equipment). The plant consists of one main building that contains offices, waste storage, and waste repackaging areas. The facility has no onsite storage of liquid fuels for the site as the

facility runs on natural gas, aside from two to three cannisters of Propane for the Powered Industrial Trucks (PITs) onsite. Hazardous waste contained in containers and totes are stored within the main building in various designated areas. The Site Location is indicated on **Figure 1**.

CS Clean has up to eight employees onsite and usually operates one eight-hour shift Monday through Friday. On occasion there may be employees onsite during off-hours for miscellaneous/non-routine activities.

The manufacturing processes at CS Clean produce several different hazardous waste streams, treat, and store various hazardous waste streams. A list of potential waste streams and hazardous waste streams was previously reported to Phoenix Fire Department using the Hazardous Materials Identification System (HMIS). The generation rate, storage location, and handling methods for these wastes are discussed further in this section.

The following are the key elements of the Hazardous Waste Management Program as they apply to CS Clean:

- Identification and Listing Hazardous Waste
- Standards for Generators and Transporters of Hazardous Waste
- Hazardous Waste Facility Standards and Permit Requirements
- Hazardous Waste Shipping and Manifest Requirements

CS Clean operates as a TSDF station per AAC R-18-8-264. The facility receives spent Cleansorb columns of hazardous waste to treat the waste so Cleansorb columns can be utilized as part of a column regeneration process. Cleansorb vessels are designed to be reusable. A Cleansorb column is initially filled with virgin granulate, is installed in a manufacturing process exhaust scrubber at an offsite location, and will abate hazardous gases until such time that the granulate within it is spent. At that time, the end user purges the column with inert gas to remove any hazardous vapors which may remain in the column, removes the spent column for shipping, and installs a new Cleansorb column filled with virgin granulate. The spent column is then returned to CS Clean who then treats the waste and stores the waste prior to offsite disposal and decontamination of the Cleansorb column for reuse. The process is described in detail below for the treatment, storage, and disposal of spent columns.

- The receipt of spent scrubber columns containing potentially hazardous spent granulate from end product users;
- Removal of the spent granulate from the columns, which is then transferred into approved shipping containers at the CS Clean facility, followed by either:
    - Treatment and transportation of the spent granulate offsite for disposal via a third-party environmental services vendor.

      OR
    - Transferal of the spent granulate to a permitted reclamation facility for the recovery of precious metals, where possible.

- Decontamination, fine cleaning, testing, and refilling of the spent columns with virgin granulate; and,
- Shipping of the cleaned and regenerated columns to service at the end users' facilities.

Additionally, the facility is a permitted LQG, EPA I.D. #AZR000528570, with one hazardous waste Central Accumulation Area (CAA) storage. Waste is stored initially in Satellite Accumulation Areas (SAA) located throughout the waste process area. Once the SAA waste is removed the waste is transported to and stored in the CAA located to the west, within the waste storage area. The waste is stored for less than ninety days onsite prior to removal by a permitted hazardous waste transporter. The CAA is routinely inspected, and a copy of the Hazardous Waste Inspection Log is included as **Appendix A**.

Further information on the hazardous wastes and hazardous materials stored at CS Clean can be found in **Appendix B** identifies the storage location and applicable notes for each waste.

When disposing of a hazardous waste, the generator must fill out a Hazardous Waste Manifest form (with help from the hazardous waste transporter) which lists facility information, type and volume of waste being shipped offsite, transporter information, and details of the destination facility. CS Clean must retain copies of each manifest.

CS Clean utilizes hazardous materials in its production processes. Hazardous materials are stored throughout the facility. The hazardous materials are stored in containers with sizes ranging up to and including 55-gallon drums and 275-gallon totes. The hazardous constituents of the drums and totes are classified as flammable, pyrophoric, irritants, compressed gases, corrosive, or toxic materials. Other areas of hazardous material storage include a generator onsite with propane. Safety Data Sheets (SDSs) shall be maintained by the site and be made accessible for more specific information on the summarized hazards below in an emergency situation. Hazardous materials reported to the Phoenix Fire Department previously are included in the HMIS spreadsheet attached in **Appendix B**.

2.2 Amendments

This plan must be reviewed, and immediately amended, if necessary, whenever:

- Applicable regulations are revised;
- The plan fails in an emergency;
- The generator 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;
- The list of emergency coordinators changes; or
- The list of emergency equipment changes.

Table 1 AMENDMENTS			
Section Amended	**Date**	**Description**	**Name of Amender**
Throughout	10/20/25	Updated Primary Coordinator Contact	Chelsea Thompson, Associate Consultant
Throughout	10/20/25	Update to inspections and TSDF	David Webster, Senior Project Manager

3.0 HAZARDOUS WASTE CONTINGENCY AND EMERGENCY ACTION PLAN

3.1 Purpose

In accordance with 29 CFR 1910.38, 29 CFR 1910.120(l), and 40 CFR 262.260, 40 CFR 264.56, and 40 CFR 270.14, respectively, as well as the ADEQ Hazardous Waste Contingency Plan regulations under Sections R18-08-262 and R18-08-262, this plan will be used in the event of an emergency.

The intent and purpose of this plan are:

- To act as a guide during actual emergency situations;
- To minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or their constituents to the air, soils, or surface water; and
- To familiarize local emergency response personnel (e.g., police, fire, hospitals) with the types of material used and stored, and internal emergency response procedures.

The provisions of this plan will be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

3.2 Initial Notifications

At CS Clean, the following personnel must be notified in the case of a sudden or non-sudden release of hazardous wastes, fire, or explosion.

The phone number at the plant to be used by persons outside the facility (e.g., police, fire, spill contractors, etc.) is (520) 263-0235.

TABLE 2 EMERGENCY CONTACTS				
Role	**Name**	**Address**	**Home/ Cell Phone**	**Facility Phone**
Emergency Coordinator	Jacob Newman	2453 West Parkside Lane, Suite 150, Phoenix, AZ	(360) 852-6410	(520) 263-0235
Alternate Emergency Coordinator	Jason Dugay	26 Commerce Drive, Danbury, CT	(203) 648-0881	(203) 797-8155
Alternate Emergency Coordinator	Adam Furphy	26 Commerce Drive, Danbury, CT	(845) 337-7385	(203) 797-8155

In case of an imminent, actual emergency at the plant, the Emergency Coordinator, or the Alternate, shall be contacted first. The Emergency Coordinator shall carry out the emergency plan agreed upon by local police, fire department, hospitals, contractors, and state and local emergency response teams.

Upon being notified, the **Emergency Coordinator** will obtain the following information:

1. Nature of Emergency (i.e., fire or spill);
2. Location of Emergency;
3. Size and Extent of Emergency;
4. Hazardous Materials Involved (if any); and
5. Injury to Personnel.

Emergency Coordinator Qualifications:

The Emergency Coordinator and the Alternates have been chosen based upon the following required qualifications:

- The Coordinator or Alternates must be onsite or on-call at all times;
- Must be familiar with the facility layout;
- Must know the locations and characteristics of the waste handled;
- Must be thoroughly familiar with contingency and emergency plans;
- Must be familiar with all operations and activities at the facility;
- Must know the locations of all records; and
- Must have the **authority** to commit facility resources in the event of an emergency.

3.3 Implementation of the Contingency Plan

The decision to implement the Contingency Plan depends upon whether an actual situation could threaten human health or the environment. This section outlines the decision making criteria that the Emergency Coordinator will use to define situations in which the Contingency Plan will be implemented. The Contingency Plan will be implemented in the following situations, or other situations upon the judgment of the Emergency Coordinator or, in his or her absence, the Alternate Emergency Coordinator.

Fire and/or Explosion

- A fire causes the release of toxic fumes.
- The fire spreads and could possibly ignite materials at other locations onsite or could cause heat induced explosions.
- The fire could possibly spread to offsite areas.
- Use of water or chemical fire suppressant could result in contaminated run-off.
- An imminent danger exists that an explosion could occur, causing a safety hazard because of flying fragments or shock waves.
- An imminent danger exists that an explosion could ignite other hazards waste at the facility.
- An imminent danger exists that an explosion could result in the release of toxic materials.
- An explosion has occurred.

Spills or Material Release

- The spill could result in the release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
- The spill could cause the release of toxic liquids or fumes.
- The spill can be contained onsite, but the potential exists for ground water contamination.
- The spill cannot be contained onsite, resulting in offsite soil contamination, air, or ground water or surface water pollution.

Floods

- Floods occur from rain, snow, storms, storm surges, or overflows of dams and water systems.
- Floods can lead to power outages, gas line emergencies, damage to the building and its contents, and create landslides.
- Flood water can become energized by electrical equipment exposed to flood waters.

Power Outage and Natural Gas Emergency

- The potential exists for power outages and natural gas emergencies, which could create an employee safety hazard or damage onsite machinery/equipment. In addition, in the event of a power outage, ventilation could be turned off, which establishes a dangerous environment due to fumes.
- Emergency Response Coordinators are responsible for evacuation and determining conditions under which hazardous conditions may exist due to power failure.

Natural Disasters and Inclement Weather

- The potential exists for natural disasters, such as hurricanes or tornadoes, as well as other types of inclement weather.

Bomb Threats, Civil Disturbances, Workplace Violence, and Suspicious Mail

- The potential exists for area bomb threats, civil disturbances, workplace violence, and/or suspicious mail.

Medical Responses

- Due to the inherent nature of the activities conducted at the facility, a potential exists for both serious medical and non-serious/non-emergency situations.

3.4 Emergency Procedures

3.4.1 Immediate

Emergency procedures are the responsibility of the Emergency Coordinator or his/her Alternate. Immediate procedures are outlined below.

1. If necessary, the Emergency Coordinator will activate internal facility alarms or communication systems to notify all facility personnel.
2. If safety permits, each operator should shut down his/her operations; most importantly turn off running processes, if safe to do so. See supervisor if unsure of procedure.
3. All personnel and visitors shall exit using predetermined routes described in this plan.
4. If their help is needed, the Emergency Coordinator will notify the appropriate State and local agencies included in the emergency procedural flow diagrams.
5. The Emergency Coordinator must identify the character, exact source, amount, and extent of any release materials and assess possible hazards to human health or the environment.
6. If the Emergency Coordinator determines that there is a threat to human health or the environment outside the facility, or if greater than the reportable quantity (RQ) of a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substance or a Superfund Amendments and Reauthorization Act (SARA)

Extremely Hazardous Material (see http://www2.epa.gov/sites/production/files/2013-08/documents/list_of_lists.pdf) is released, it must reported to:

- Emergency Spill Clean Up Contractor: Veolia
  - **Telephone Number: (602) 233-2955**
- ADEQ spill hotline
  - **Telephone Number: (602) 771-8786**
- LEPC for CERCLA/SARA release greater than the RQ
  - **Telephone Number: (602) 273-1411**
- National Response Center (NRC)
  - **Telephone Number: 1-800-424-8802**

The following information must be provided to ADEQ, the LEPC, and the NRC when contacted:

- Name and telephone number of reporter;
- Name and address of facility;
- Time and type of incident (e.g., release, fire, etc.);
- Where did the incident occur;
- How did the incident occur;
- Name and quantity of material(s) involved, to the extent known;
- What actions were taken to respond and contain the incident;
- The possible hazards to human health or the environment outside the facility; and
- The extent of injuries, if any.

3.4.2 During Emergency

During an emergency, the Emergency Coordinator or his/her alternate must be aware of the following possible problems:

- If the facility stops operations in response to a fire, explosion, or release, the Emergency Coordinator must monitor for leaks, pressure build up, gas generation, or ruptures in the valves, pipes, or other equipment as appropriate.
- In the affected areas of the facility, no waste that may be incompatible with the released material should be treated, stored, or disposed of until after the cleanup procedures have been completed.

It should be noted that in the event of an emergency, the Emergency Coordinator is not the incident commander. The role of the incident commander will be assumed by the "senior" member of one of the responding agencies (i.e., fire or police department).

3.4.3 Follow-Up

Immediately after an emergency, the Emergency Coordinator must ensure the following:

- All emergency equipment, listed in the Contingency Plan and used during the emergency, is cleaned, decontaminated, and is fit for reuse or replaced.
- All waste materials generated during the emergency must be properly identified, stored, and disposed of in accordance with State and Federal regulations.
- Notify the EPA Regional Administrator and the local authorities that all of the actions have been completed before resuming operations.
- Write a summary of the incident for the company's record files and forward a copy to the EPA Regional Administrator and ADEQ officials within fifteen days.

3.5 Control Procedures

Sections 3.5.3 through **3.5.6** provide detailed information for the handling of each classification of emergency. The plan includes tabbed dividers directing facility personnel to sections outlining emergency control procedures for each type of incident. Immediately following the section are procedural flow diagrams for each of the emergencies listed above.

3.5.1 Establishment of Control Zones

During an emergency incident, if the Emergency Coordinator or Alternate determines that evacuation is **NOT** necessary, for spills other than incidental spills the Emergency Coordinator must establish control zones around the affected area(s). Incidental spills do not require establishment of control zones. The purpose of setting up control zones is to minimize the potential adverse impact of the incident on employees, citizens, responders, the environment, and property.

The Emergency Coordinator will designate three major zones around the affected area. Personnel should move through access control points only.

1. **Hot Zone (Exclusion Zone)**

   This is the area of most concern. Only trained emergency responders with the use of proper personal protective equipment (PPE) and the buddy system may have access into this area. The area of the Hot Zone shall extend far enough to prevent adverse effects from hazardous materials. Only those emergency responders necessary to control the incident or to rescue others may enter into this area.

2. **Warm Zone (Contamination Reduction Zone)**

   The Warm Zone is an area of limited access. The purpose of the Warm Zone is to reduce the spread of contamination and control access to and from the Hot Zone. It also serves as a buffer zone and, at least initially, is not contaminated. Contamination in this zone should remain in the "Decontamination Corridor" that is located in this zone. Decontamination will take place in the Decontamination Corridor. PPE will be worn as required in this area. The size of the Warm Zone will be determined by the nature of the

incident and the size of decontamination operations to be conducted within. The Emergency Coordinator will make this decision.

3. **Cold Zone (Support Zone)**

   The Cold Zone is the area that borders the outer perimeter of the Warm Zone and is a clean area set up for support operations. It will be upwind from the Hot and Warm Zones and as far away from the Hot Zone as necessary for safe operations. This zone will have a secure outer boundary.

3.5.2 Fire and/or Explosion

Immediate procedures are the responsibility of the Emergency Coordinator, and not the general occupants, although general occupants may contact "911" as well. Immediate procedures are outlined below:

1. The Emergency Coordinator will activate the fire alarm and use the intercom system to notify all facility personnel to evacuate and contact "911" via telephone. List the following information for the emergency responders.
   a. Name;
   b. Address of the facility;
   c. Extent of fire;
   d. Possible chemicals involved; and
   e. Approximate quantity of chemicals involved.
2. The Emergency Coordinator will initiate full evacuation of the affected area(s) as necessary, if not already accomplished by the sounding of the fire alarm. Evacuation procedures are contained in **Section 3.7**. Upon emergency responders arriving, the Emergency Coordinator will turn over all emergency coordinator duties to unified command until the event is concluded.
3. If a spill of material occurs, then the Spill Control Procedure (**Section 3.5.3**) will be followed. **NOTE: Fire emergencies supersede spill emergencies.**
4. In the event of the active and uncontrolled release of hazardous materials reporting will occur per **Section 4.0**.
5. As necessary, the Emergency Coordinator should notify the appropriate federal, state, and local agencies, included in **Section 4.0**, for all releases to the environment based on the extent and conditions of the emergency.
6. The Emergency Coordinator and first responders must monitor for leaks, pressure build up, gas generation, or ruptures in valves, pipes, or other equipment as appropriate.

Fire-fighting will not be performed by the CS Clean personnel unless trained in the use of portable fire extinguishers for small incipient fires. Fires judged to be of greater magnitude will be referred to the local fire-fighting officials. CS Clean will use the "911" telephone emergency service which contacts the Phoenix Fire Department.

Outside calls will not be accepted unless absolutely necessary so that the phone lines remain free to handle only emergency calls.

Area or plant evacuation will be necessary in case of a major fire or explosion. All personnel have been trained in evacuation procedures and means of exit from their respective work areas.

The Emergency Coordinator will be responsible for determining if personnel who are not in the affected area will stay in their respective work area. Supervisors of unaffected areas will stay with their personnel and be ready to evacuate. Accountability Coordinators will be ready to account for the persons under their supervision.

An "all clear" signal will be given, at the discretion of the Emergency Coordinator, when the fire has been extinguished, and the safety of personnel is no longer endangered. The Emergency Coordinator will determine when the emergency has passed and the "all clear" signal can be given. All emergency equipment must be cleaned and fit for reuse prior to resuming plant operations in the affected areas.

In the event of a small controllable fire such as a small incipient fire, the following procedures should be followed by employees trained with portable fire extinguishers:

1. Notify Emergency Coordinator.
2. Obtain fire extinguisher; extinguish flames.
3. Eliminate and continue to restrict all sources of ignition so the fire will not re-ignite.
4. If unable to immediately extinguish, sound alarm and leave area. If not extinguished, follow the procedures below.
5. Implement measures to control any water run-off, if contaminated, or any material that has been released.

EMERGENCY PROCEDURE-FIRE AND/OR EXPLOSION

CONTACT EMERGENCY COORDINATOR:	Work Phone	Cell Phone
Emergency Coordinator – Jacob Newman	(520) 263 0235	(360) 852 6410
Alternate Coordinator – Jason Dugay	(203) 648-0881	(203) 797-8155
Alternate Coordinator – Adam Furphy	(203) 797-8155	(845) 337- 7385

EMERGENCY COORDINATOR OR ALTERNATE OBTAINS THE FOLLOWING INFORMATION:

1) Nature of Emergency;
2) Location of Emergency;
3) Size and Extent of Emergency;
4) Hazardous Materials involved (if any); and
5) Whether any Personnel are injured.

PERSONNEL INJURED?

YES

NO

EMERGENCY COORDINATOR OR ALTERNATE CONTACTS THE FOLLOWING:

AMBULANCE:	911	FIRE DEPARTMENT:	911
POLICE:	911	URGENT CARE:	602-547-2600
MEDICAL CENTER:	623-879-6100	POISON CONTROL CENTER:	1-800-222-1222

BE PREPARED TO GIVE: NAME, ADDRESS, EXTENT OF INJURIES, EXTENT OF EMERGENCY, POSSIBLE CHEMICALS INVOLVED AND QUANTITY.

IF NECESSARY, THE EMERGENCY COORDINATOR OR ALTERNATE WILL NOTIFY ALL PERSONNEL BY FIRE ALARM OR PA SYSTEM TO EVACUATE THE BUILDING.

THE AREA WILL BE CLEARED OF ALL PERSONNEL. THESE PERSONS ARE TO REPORT TO THE RALLY POINT FOR ACCOUNTABILITY.

EMERGENCY COORDINATOR OR ALTERNATE CONTACTS:

- FIRE DEPARTMENT: 602-262-6297 (NON-EMERGENCY)
- MEDICAL SERVICES: 602-943-2381 (NON-EMERGENCY)
- POLICE DEPARTMENT: 602-262-6151 (NON-EMERGENCY)
- FIRE MARSHAL: 602-262-6771
- ARIZONA DEQ: 602-771-2300
- NRC: 1-800-424-8802
- VEOLIA SPILL RESPONSE: 602-233-2955

IS THERE A SPILL OR RELEASE OF ANY HAZARDOUS MATERIALS?

NO

YES

FOLLOW PROCEDURES IN THE CONTINGENCY PLAN

FIRE EXTINGUISHED BY OFFSITE RESPONSE PERSONNEL

REPORTING REQUIREMENTS MET

EVENT CONCLUDED

3.5.3 Spills

All spills/releases of hazardous materials must be reported to the Emergency Coordinator. Spills are defined as an unexpected release of any hazardous substance from a container, and a leak is defined as a release from a container via a puncture or a weak spot. It should be noted that personnel will not conduct emergency responses to spill or releases of hazardous materials that may threaten one's safety, health, or the environment without Hazardous Waste Operations and Emergency Response (HAZWOPER) training per 29 CFR 1910.120(e). Thus, any spill that is not small enough to be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area or poses an adverse exposure hazard to employees, will be considered an emergency response, and may not be handled by untrained personnel. Any incidental spill may be cleaned up by personnel, and the release does not constitute a safety, health, or environmental hazard. The Emergency Coordinator will determine the proper response in accordance with the control procedures outlined with this section.

Emergency procedures are the responsibility of the Emergency Coordinator, and not the general occupants. Procedures are outlined below:

1. If a leak develops or a spill of chemicals or oil develops, the person discovering the discharge will leave the immediate area and contact the Emergency Coordinator. The Emergency Coordinator will obtain the following information:
    - Person(s) injured and seriousness of injury;
    - Location of the spill or leak, material involved, and source;
    - The approximate amount spilled, an estimate of the liquid and/or gas discharge rate, and the direction the liquid flow or gaseous cloud is moving; and
    - Whether a fire is involved.
2. Next, the Emergency Coordinator or Alternate will:
    - Initiate evacuation of the hazard area, as necessary. Evacuation procedures are contained in **Section 3.7**. For small spills or leaks, isolate at least 50 feet in all directions. For large spills, initially isolate at least 100 feet in all directions and keep all personnel upwind of the release.
    - Call for emergency, fire, and medical services if a fire or medical emergency is involved by calling "911." IF A HISSING SOUND COMES FROM A VENTING DEVICE OR IF A DRUM BEGINS TO DISCOLOR, WITHDRAW FROM THE AREA IMMEDIATELY.
    - If the spill can be contained using the equipment onsite and if the containment operation will not involve employee exposure or reasonable possibility for employee exposure to safety or health hazards, then the procedure in **Step 3** (below) may be used. If not, proceed as follows.
        - Contact the commercial emergency clean-up firm and dispatch emergency personnel to the site to take appropriate action.

- Contact the proper authorities to report the spill or release. Reporting requirements are contained in **Section 4.0**. Contact local authorities first so that, if necessary, downstream water users and/or persons downwind of the vapor can be notified and, if necessary, removed.

3. If the spill is an incidental release that is small enough to be absorbed, neutralized, or otherwise controlled at the time of release, and does not pose an adverse exposure hazard to employees or the environment, then the spill will be handled by CS Clean personnel. The CS Clean trained emergency response team may respond when the spill is more significant than an incidental release, but only if it can be safely handled by properly trained personnel using proper PPE. General spill response procedures include the following:
4. Make sure all unnecessary persons are removed from the hazard area.
5. If flammable waste is involved, remove all ignition sources.
6. The Emergency Coordinator must immediately restrict access in the affected area to only essential emergency response personnel. All entry points must be secured, if possible.
7. The Emergency Coordinator must establish Control Zones if a spill is greater than an incidental spill and therefore requires the trained Emergency Response Team.
8. During an emergency, the Emergency Coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous materials at the facility. These measures must include, where applicable, stopping processes and operations, collecting, and containing released materials, and removing or isolating containers. The Emergency Coordinator must ensure that no hazardous material/waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed.
9. For emergency personnel containing/cleaning the spill, don necessary PPE. The type of respiratory protection needed will be determined by the type, quantity, and location of material involved in the incident and will be prescribed by the Emergency Coordinator.
10. If possible, try to stop the leak.
11. Dike the spill with Standard Industrial Absorbent as required.
12. Position ABC fire extinguishers near immediate clean-up area.
13. Remove all surrounding materials that could be especially reactive with the materials in the waste. Determine the major components in the waste at the time of the spill.
14. Pump standing liquids to available empty containers/tanks compatible with material/waste. For the remainder of spilled material use absorbent pads, booms, earth, sandbags, sand, and other inert materials to contain, divert, neutralize, and clean up a spill if it has not been contained by a dike or a sump. Most spills contained within a dike or sump can be pumped back into the appropriate storage tank or drum.
15. Procedure to follow for leaking container (drum, ton-pack, etc.):
    a) Move container into or construct a containment area;

b) Roll container or stand up on end away from leak;

c) Drain contents (transfer to clean container);

d) Label container accordingly;

e) Absorb spillage of leakage with absorbent;

f) Transfer absorbent waste to drum or other container, label accordingly; and

g) Store until final disposal.

16. If waste reaches a storm sewer, try to stop flow from the source by using sand, soil, sandbags, etc. If this is done, pump this material out into a temporary holding tank as soon as possible. The Phoenix Water Services Department (602-262-6251) must be notified if the spill accesses the storm sewer.
17. If the spill accesses a sanitary sewer, the Arizona Water Company Regional Water Authority (602-240-6860) must be notified along with notifications noted in **Section 4.0**.
18. Decontaminate all PPE that will not be disposed of, as noted in the Decontamination Procedures (**Section 3.8**)
19. Place all containment and clean-up materials in drums for proper disposal. Some items, such as absorbent rags or booms, may have to be cut up.
20. Place all recovered liquid wastes in drums, label drums in accordance with all applicable hazardous waste rules and regulations, for proper disposal.
21. It should be noted that CS Clean personnel will not assist in handling significant hazardous materials spills that pose a risk to plant personnel and which the Emergency Response Coordinator determines are beyond the scope of safe handling by the CS Clean Emergency Response Team. For these more significant hazardous materials spills, the Emergency Coordinator will utilize the services of a qualified clean up contractor, Veolia.
22. All emergency equipment used in the emergency will be returned to ready status prior to resuming plant operation in the affected area.

EMERGENCY PROCEDURE
SPILL AND/OR RELEASE OF HAZARDOUS MATERIAL

CONTACT EMERGENCY COORDINATOR	Work Phone	Cell Phone
Emergency Coordinator – Jacob Newman	(520) 263 0235	(360) 852 6410
Alternate Coordinator – Jason Dugay	(203) 648-0881	(203) 797-8155
Alternate Coordinator – Adam Furphy	(203) 797-8155	(845) 337- 7385

EMERGENCY COORDINATOR OR ALTERNATE OBTAINS THE FOLLOWING INFORMATION:

1) WHETHER ANY PERSONNEL ARE INJURED;
2) LOCATION OF EMERGENCY, MATERIAL INVOLVED;
3) SIZE AND EXTENT OF EMERGENCY; AND
4) WHETHER A FIRE IS INVOLVED.

PERSONNEL INJURED?

YES

EMERGENCY COORDINATOR OR ALTERNATE CONTACTS THE FOLLOWING:

AMBULANCE:	911
FIRE DEPARTMENT:	911
POLICE:	911
URGENT CARE:	602-547-2600
MEDICAL CENTER:	623-879-6100
POISON CONTROL CENTER:	1-800-222-1222

BE PREPARED TO GIVE: NAME, ADDRESS, EXTENT OF INJURIES, EXTENT OF EMERGENCY, POSSIBLE CHEMICALS INVOLVED AND QUANTITY.

NO

IN THE CASE OF A FIRE, THE EMERGENCY COORDINATOR OR ALTERNATE CONTACTS THE FOLLOWING, AND FOLLOWS FIRE/EXPLOSION PROCEDURES IN 2.5.1 OF THE CONTINGENCY PLAN.

FIRE DEPARTMENT: 911

BE PREPARED TO GIVE NAME, ADDRESS, EXTENT OF FIRE, AND POSSIBLE CHEMICALS INVOLVED

IF NECESSARY, THE EMERGENCY COORDINATOR OR ALTERNATE WILL NOTIFY ALL PERSONNEL BY FIRE ALARM OR PA SYSTEM TO EVACUATE THE BUILDING.

CAN THE SPILL BE ABSORBED, NEUTRALIZED, OR OTHERWISE CONTROLLED AT THE TIME OF RELEASE BY EMPLOYEES IN THE IMMEDIATE RELEASE AREA OR BY MAINTENANCE PERSONNEL WITHOUT POSING A SAFETY OR HEALTH HAZARD?

YES

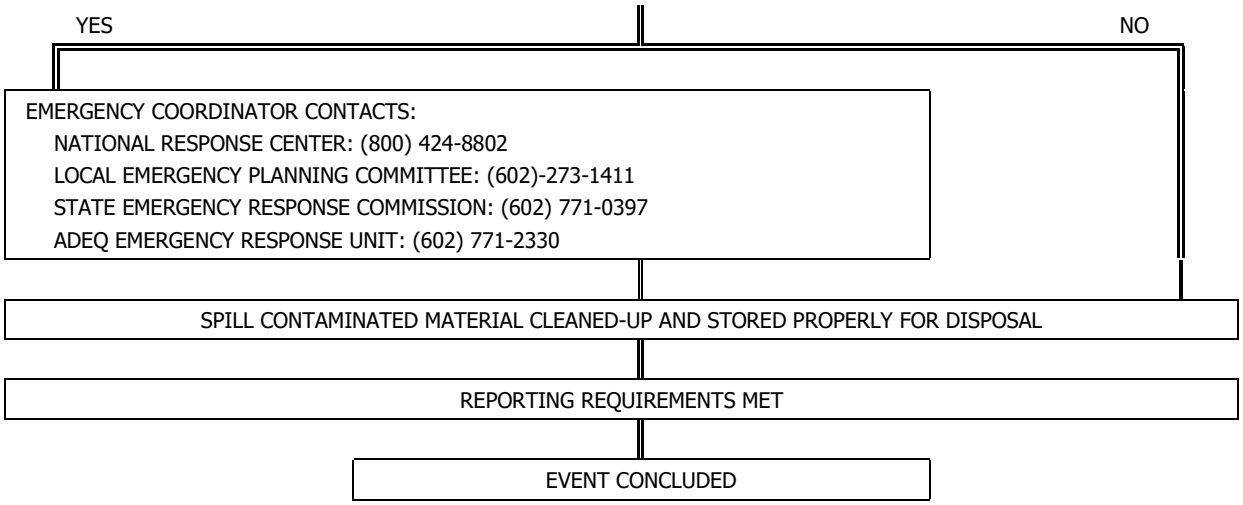
CONTAIN SPILL, CLEAN-UP SPILLED MATERIAL, STORE PROPERLY FOR DISPOSAL

NO

EMERGENCY COORDINATOR CONTACTS:
Phoenix Fire Department: 911
Veolia: (602) 233-2955

HAS SPILL REACHED OR THREATENED NAVIGABLE WATERS OR IS SPILL A CERCLA/SARA EXTREMELY HAZARDOUS MATERIAL AND GREATER THAN THE REPORTABLE QUANTITY?
(SEE http://www2.epa.gov/sites/production/files/2013-08/documents/list_of_lists.pdf)

(Continued on next page)


YES
NO
EMERGENCY COORDINATOR CONTACTS:
NATIONAL RESPONSE CENTER: (800) 424-8802
LOCAL EMERGENCY PLANNING COMMITTEE: (602)-273-1411
STATE EMERGENCY RESPONSE COMMISSION: (602) 771-0397
ADEQ EMERGENCY RESPONSE UNIT: (602) 771-2330
SPILL CONTAMINATED MATERIAL CLEANED-UP AND STORED PROPERLY FOR DISPOSAL
REPORTING REQUIREMENTS MET
EVENT CONCLUDED

3.5.4 Floods

In the case of impending flood, it is assumed that adequate warning will be provided by weather forecasters in the area. In such situations, the Emergency Coordinator will close the facility and send facility personnel home. If a flood strikes unexpectedly, the Emergency Coordinator will instruct personnel to evacuate to sufficiently high enough ground. Evacuation procedures are contained in **Section 3.7**.

1. Relocate to an area of high ground above rising flood waters.
2. If there is a sufficient warning attempt to sandbag areas of concern to prevent rising flood waters from entering the facility.
3. Do not attempt to drive or walk through flood waters. Waters can potentially wash away vehicles or pedestrians.
4. Remain in a protected area until instructed by the Emergency Coordinator to resume normal activity.

3.5.5 Other Emergency Procedures

Listed below are the procedures that will be followed for other potential emergencies at the discretion of the Emergency Coordinator. Due to the fact that these types of emergencies are inherently local in nature, the Emergency Coordinator at the facility will rely on the Local Emergency Management Office for assistance. This office can be contacted as follows:

Maricopa County Local Emergency Planning Committee
5630 E McDowell Road
Phoenix, AZ 85003
(602) 273-1411
IN AN EMERGENCY DIAL 911

3.5.6 Natural Disaster

In the case of impending natural disaster (i.e., hurricane, tornado, flash floods, etc.), it is assumed that adequate warning will be provided by weather forecasters in the area. In such situations, the Emergency Coordinator will close the facility and send facility personnel home or provide a safe environment at the plant until severe weather has passed. If a natural disaster strikes unexpectedly, the Emergency Coordinator will instruct personnel to evacuate to an internal rally point. Evacuation procedures are contained in **Section 3.7**.

Basic Procedures to Follow During Natural Disasters Are:

1. Do not stay where exposed or in personal vehicles.
2. Do not seek shelter near windows, openings, or doorways.
3. Relocate to an area of high structural integrity.
4. Remain in a protective area until instructed by the Emergency Coordinator to resume normal activity.

3.5.7 Bomb Threat:

In the case of a bomb threat, the Emergency Coordinator will call for full facility evacuation in accordance with the procedures contained in **Section 3.7**. In addition, the fire department and police will be notified. The individual who received the bomb threat should obtain the following information for the authorities:

1. Sound of the caller's voice,
2. Area of danger,
3. Type of bomb, and
4. Date and time of call.

3.5.8 Civil Disturbance/Workplace Violence:

In the case of a civil disturbance, the police will be contacted. If necessary, the Emergency Coordinator will initiate evacuation to an internal or external rally point in accordance with procedures contained in **Section 3.7**. The Emergency Coordinator can determine if it is safer to shelter in place. Procedures to be followed by employees identifying civil disturbances or workplace violence should be as follows:

1. Evacuate.
    a. If there is an accessible escape path, attempt to evacuate the premises.
    b. Evacuate regardless of whether others agree to follow.
    c. Leave your belongings behind.
    d. Help others evacuate, if possible.
    e. Call 911 when you are safe.
    f. Prevent individuals from entering an area where the violent person may be.
    g. Keep your hands visible.
    h. Follow the instructions of any police officers.
    i. Do not attempt to move wounded people.

2. Shelter in place.
    a. If evacuation is not possible, find a place to hide where the violent person is less likely to find you. Your hiding place should be out of the violent person's view.
    b. Provide protection if shots are fired in your direction (i.e., an office with a closed and locked door).
    c. To prevent a violent person from entering your hiding place lock the door or blockade the door with heavy furniture.
    d. Silence your cell phone.
    e. Turn off any source of noise (i.e., radio, television).
    f. Hide behind large items (i.e., cabinets, desks).
    g. Remain quiet.
3. Protect Yourself.
    a. As a last resort, and only when your life is in imminent danger, attempt to disrupt and/or incapacitate the violent person by:
        i. Acting as aggressively as possible against him/her.
        ii. Throwing items and improvising weapons.
        iii. Yelling.
    b. When police arrive:
        i. Put down any items in your hands.
        ii. Keep hands visible.
        iii. Follow all instructions.
        iv. Avoid making quick movements towards officers.
        v. Do not stop to ask officers for help or direction when evacuating, just proceed in the direction from which officers are entering the premises.

At the end of the emergency event, the Emergency Coordinator should conduct a thorough investigation into the cause of the emergency incident. Ensure that necessary procedural or process modifications are made to prevent reoccurrences or potential emergencies. Critique the emergency action procedures followed and make any changes to procedures as needed where deficiencies may have occurred.

3.5.9 Power Outage

In the event of a power outage, all employees and visitors are to go to the outside rally point until further instruction. The Emergency Coordinator will then determine if it is safe for employees to go to the internal rally point where they will remain until further instruction. Evacuation procedures are contained in **Section 3.7**. The facility is equipped with an emergency lighting system. Subsequently, the Emergency Coordinator will contact the local power company, Arizona Public Service (1-800-

240-2014), to determine the next course of action (i.e. sending workers home) and ensure the facility is in safe condition when power is restored.

3.5.10 Suspicious Mail

If an employee observes a piece of mail that appears suspicious (i.e., excessive postage, excessive tape, lopsided or lumpy in appearance, marked with "personal" or "confidential", handwritten with no return address, unexpected or from an unknown party, or addressed to someone no longer employed at the facility), then they should follow the following procedure:

1. Do not handle a letter or package that you suspect is contaminated.
2. Do not shake it, bump it, or sniff it.
3. Wash your hands thoroughly with soap and water.
4. Notify local law enforcement authorities.
5. Notify the Emergency Coordinator of the situation.

3.5.11 Natural Gas Emergency

If a strong odor or gas leak is noted, then employees will be instructed **not** to:

1. Use the telephone,
2. Operate any gas or electric machinery,
3. Light a match, or
4. Turn light switches on and off.

The Emergency Coordinator will instruct all employees to evacuate the building, if necessary, to the external rally point. Once outside, the Emergency Coordinator will contact the local power company, gas company, and, if necessary, the local Fire Department and LEPC.

3.5.12 Medical Response Procedures

After discovery of a medical response situation and a determination that entry to the emergency area will not cause further harm to the injured or yourself, an employee should quickly survey the scene prior to calling the ambulance (911). The employee should indicate to the dispatcher the following information:

- Is the scene safe?
- What happened?
- How many people are injured?
- Is the victim's airway blocked?
- Is the victim breathing?
- Can you feel the victim's pulse?

CS Clean has emergency equipment such as eyewashes located throughout the facility and are indicated on **Figure 3**. This equipment is available to provide immediate emergency use in case of chemical splash. Additionally, first aid kits and automated external defibrillators (AEDs) are present throughout the facility and noted on **Figure 3**.

3.5.13 First Aid Response

1. Move victim to fresh air; call emergency response number: 911.
2. If not breathing, give artificial respiration.
3. In case of contact with material, immediately flush skin and eyes with running water for at least fifteen minutes.
4. Remove and isolate contaminated clothing and shoes.
5. Administer additional first aid as appropriate.
6. Keep victim warm and await arrival of emergency medical response unit.

CS Clean works closely with NextCare Urgent Care (602-547-2600) located at 18589 N 59th Ave, Glendale, AZ 85308 to make them aware of the hazardous materials onsite. NextCare Urgent Care can provide necessary first aid supplies needed for medical emergencies at CS Clean.

3.5.14 Serious Medical Emergencies

In case of serious medical emergency, an ambulance will be summoned by calling 911. Examples of serious medical emergencies include the following:

- Persons with burns from fire and/or chemical spills,
- Heart attacks, cardiac arrest, or strokes,
- Persons undergoing shock,
- Chemical poisoning, and
- Severe seizures.

The Honor Health Deer Valley Medical Center (623-879-6100), located at 19829 N 27th Ave, Phoenix, AZ 85027 has been selected as the receiving facility for all medical emergency situations due to its close proximity. The direct phone number for the Honor Health Deer Valley Medical Center is 623-879-6100.

3.5.15 Non-Serious Medical Emergencies

In the case of non-serious, non-emergency situations where medical attention is needed, the employee will be taken to NextCare Urgent Care (602-547-2600), for treatment. Examples of non-serious/non-emergency situations include the following:

1. Minor bleeding,
2. Fractures, dislocations, sprains, and strains,

3. Minor eye/nose injuries, and
4. Temperature extremes.

CS Clean has first aid supplies in cabinets throughout the facility shown on **Figure 3**.

3.6 Emergency Equipment/Containment Structures

Location of emergency equipment is shown on **Figure 3** and briefly described in **Table 3**. All existing equipment must be inspected routinely and maintained to ensure its quality and efficiency.

Spills and leaks from the container storage area and tank storage area will be contained by virtue of the walls, impervious base, and berm. An impervious base provides spill containment of up to ten percent of the stored wastes.

Access to emergency communications and alarm systems (either permanent or portable), are available to all personnel operating the facility. Warning signs and 24-hour surveillance of all facilities will preclude any unauthorized personnel from coming in contact with hazardous materials at the facility.

Table 3
EMERGENCY EQUIPMENT

Item	Description/Capabilities	Location
Emergency Communication		
Telephone Systems	Capable of internal and external communication.	Main Offices
Fire Alarm System	Audible warning device with remote central monitoring.	Throughout Facility (**Figure 3**)
Fire Suppression System	A system of sprinklers that release water to control and extinguish fires.	Throughout Facility (**Figure 3**)
First Aid		
Emergency Eye Wash	Provide flooding spray of potable water at an angle to flood both eyes simultaneously to flush toxic chemical splashed in eyes.	**Figure 3**
Emergency Shower	Provide shower of potable water to flush toxic chemicals splashed on body.	**Figure 3**
Emergency Eye Wash Bottles	Provide flooding spray of potable water to flood eye(s) to flush toxic chemical splashed in eyes.	**Figure 3**
First Aid Kit	A collection of supplies and equipment used for administering First Aid.	**Figure 3**
AED	A device that detects sustained ventricular tachycardia or fibrillation and terminates it by a shock or shocks delivered directly to the myocardium, thus preventing sudden cardiac death.	Throughout Facility (**Figure 3**)

Table 3 EMERGENCY EQUIPMENT		
Item	**Description/Capabilities**	**Location**
Spill Response		
55-Gallon Drums	22" diameter X 34" lined and unlined steel tight head drums.	**Figure 3**
95-Gallon Overpack Spill Kits	Material used to absorb and contain spill of liquid material.	**Figure 3**
Spill Blocker Dike	A dike that can be set up around spills to help contain runoff from spills.	**Figure 3**
5-Gallon Universal Spill Kit	A spill kit with absorbent materials to clean up spills of universal waste.	**Figure 3**
5-Gallon Oil Spill Kit	A spill kit with absorbent materials to clean up spills of oil.	**Figure 3**
5-Gallon Acid Spill Kit	A spill kit with absorbent materials to clean up spills of acid.	**Figure 3**
Battery Acid Spill Kit	A spill kit with absorbent materials to clean up spills of battery acid (ex. Baking Soda).	**Figure 3**
Universal Spill Kit Chest	A large chest with absorbent materials to clean up spills of universal waste.	**Figure 3**
Fire Extinguishers	Wall-Mounted portable fire-fighting apparatus. The following types of fire extinguisher are used: Dry Chemical, CO_2; Class ABC.	Throughout Facility (**Figure 3**)
Personal Protective Equipment		
Gloves and Aprons	Rubber gloves and aprons for protection against harmful chemicals.	Throughout Facility
Goggles/ Safety Glasses	Eye/Face Protection.	Throughout Facility
Lock-out Tag-out Equipment	Equipment that allows for proper protection from and the locking out of energized devices, to prevent energy.	**Figure 3**

3.7 Evacuation Plan

The Emergency Coordinator is responsible for determining which emergency situations require plant evacuation. The facility employs an internal phone system which can be used to evacuate the facility as well as contact key plant personnel to inform them as to the nature of the emergency and recommend plan of action. Total plant evacuation is initiated only by the Emergency Coordinator or his/her Alternate.

In the event that a plant evacuation is called for by the Emergency Coordinator, the following actions will be taken:

1. The signal for plant evacuation will be activated (alarm).
2. If safety permits, each operator should shut down his/her operations. Most importantly, turn off the running processes, if safe to do so. (Do not attempt to obtain personal

belongings, unless otherwise authorized. Employees will be notified if other activities are required to be completed prior to an evacuation.)

3. ALL personnel, visitors, and contractors will immediately leave the operations area and congregate at the designated Rally Point via routes designated on **Figure 1**.
4. No persons shall remain or re-enter the location unless specifically authorized by the person(s) calling for evacuation. In allowing this, the person in charge assumes responsibility for those persons within the perimeter.
5. All persons will be accounted for by their respective accountability coordinator. The Supervisor will designate certain doors as the safest exists for his/her employees and will also choose an alternate exit if the first choice is inaccessible. To assist in this endeavor, the Emergency Coordinator will use the internal telephone system to call the Supervisors as necessary, to inform them of the nature of the emergency.
6. During exit, Accountability Coordinators should try to keep his/her group together, rallying at the designated locations on **Figure 1**, located in the north parking lot. Immediately upon exit, the Accountability Coordinators will prepare a list of all employees at the exit point. All other personnel who have persons reporting to them should report immediately to the rally point for final accounting.
7. Employees should remain in the area and stand upwind. (If any chemicals are released into the air around the building exterior, employees should move to a position where the chemicals would be blowing away from them.)
8. Upon completion of the employee list, the Accountability Coordinator in charge shall hand-carry the list to the Emergency Coordinator. All other personnel will remain at the rally point.
9. Contract personnel should also be listed with the name of their company.
10. A final tally of persons will be made by the Emergency Coordinator.
11. No attempt to find persons not accounted for will involve endangering lives of others by re-entry into emergency areas.
12. Re-entry into the area will be made only after clearance is given by the Emergency Coordinator. At his/her direction, a signal or other notification will be given for re-entry into the plant. If re-entry is not possible, non-essential personnel may be sent home.
13. In all questions of accountability, Accountability Coordinators will be held responsible for those persons reporting to them. Visitors will be the responsibilities of those employees they are visiting. Contractors are the responsibility of those persons administering the individual contracts.
14. Emergency drills will be conducted to practice all of these procedures and will be treated with the same seriousness as an actual emergency. Emergency drills are to be conducted periodically.

3.7.1 Internal Evacuation

In the event of a natural disaster (i.e., tornado) where the Emergency Coordinator has deemed the situation unsafe to send facility personnel home, the Emergency Coordinator will signal an internal evacuation.

1. The internal evacuation signal will be accomplished by intercom notification.
2. All traffic to and from the facility will cease, and each operator shall shut down his/her operations where safety permits. Turning off running water in respective areas is of primary importance. Do not attempt to gather personal belongings, unless otherwise authorized. Employees will be notified if other activities are required to be completed prior to an evacuation.
3. Water supply for operation lines should be shut off.
4. All facility personnel will precede to the center of the building in a room without windows. Under no circumstances will any facility personnel leave.
5. Each Accountability Coordinators will take a head count of the employees in their department and will report any missing persons to the Emergency Coordinator.
6. In addition, the Administrative Assistant will remove the visitors' log upon evacuation and give it to the Emergency Coordinator, who will account for any visitors.
7. Clearance to resume work assignments or go home will be given by the Emergency Coordinator.
8. In all questions of accountability, Accountability Coordinators will be held responsible for those persons reporting to them. Visitors will be the responsibility of those employees they are visiting. Contractors are the responsibility of those persons administering the individual contracts.

3.7.2 Offsite Notification/Evacuation Procedure

To notify the neighboring properties in an emergency, CS Clean will contact the Phoenix Fire Department (phone number: 911). If necessary, an evacuation of the neighboring properties will be done by the Phoenix Police Department under the direction of the Phoenix Fire Department.

3.7.3 Shut-down of Operations

In the event of an emergency, critical operations will be shut down, if safe to do so.

3.8 Decontamination and Disposal

3.8.1 Decontamination Procedures

Decontamination of personnel and equipment must be conducted to reduce or eliminate the transport of contaminants from the emergency area into other areas of the facility or out into the environment where unprotected personnel may be exposed. Decontamination methods for personnel will depend on the type of contaminants, protection level, and work assignment and operation

location. CS Clean personnel will not respond to spills or any other emergency incident which is not incidental and poses a safety or health hazard. An outside contractor will be contacted if a spill or any other emergency incident poses a safety and/or health hazard to CS Clean personnel, or the environment. If a contractor has to be called in, the contractor will be responsible for the decontamination of their own equipment.

The following decontamination procedures are to be followed for the CS Clean emergency response team.

Each incident may require different decontamination operations. The nature of the incident, the chemical, the weather, the temperature, the number of people to be decontaminated, and the number of trained personnel available are a few of the factors which dictate the method, size, and type of decontamination operation that will be required. Basic decontamination procedures are described below:

Personal Protective Equipment and Other Items

1. Cover the Decontamination Corridor with plastic and place booms or dikes to control runoff from decontamination operations.
2. Use collection containers to hold decontamination water runoff.
3. Identify the Decontamination Corridor with tape, cones, ropes, or other markers.
4. Have a segregated equipment drop at the edge of the Hot Zone for contaminated equipment. This equipment may be reused in the Hot Zone without decontaminating.
5. Have a primary decontamination wash and rinse as the first step near the Hot Zone to wash the most significant contamination off of the equipment.
6. Have a secondary wash and rinse about ten to fifteen, or more, away from the first wash to assure thorough decontamination of equipment.
7. Have a clean area either before or after the secondary wash to change self-contained breathing apparatuses (SCBAs).
8. An area near the Cold Zone and at the end of the Decontamination Corridor should be established to remove chemical suits, respiratory equipment, and other items.
9. All used equipment and supplies or contaminated items should remain in the Decontamination Corridor until it can be determined if these items can be decontaminated.
10. All contaminated items must be disposed of properly.

Victims/Personnel

1. The person(s) performing the decontamination should protect themselves from the contaminant by using the proper PPE.
2. Carefully remove respirators and PPE from the victim. If protective clothing or suits cannot be removed easily, they may be cut off.

3. Washing of PPE worn by the victim may be effective if it will not cause further harm.
4. When it is not possible to thoroughly decontaminate the victim or the PPE, the victim may be placed on plastic or other material to avoid spreading the contamination.
5. Medical personnel and facilities will be advised immediately whenever a victim is being transported or cared for and has not been thoroughly decontaminated. Medical personnel must be advised of the chemical, its properties, its hazards, known antidotes, or any other pertinent information. A copy of the SDSs will be given to medical personnel.

3.8.2 Disposal Procedures

All discarded materials, waste materials, or other objects shall be handled in such a way to avoid the potential for spreading contamination, creating a sanitary hazard, or causing litter to be left onsite. All material that has visible signs of contamination (e.g., waste chemicals, contaminated soil, etc.) will be classified as potentially contaminated material. All potentially contaminated materials (i.e., PPE, clothing, disposable equipment, etc.) will be double bagged or drummed as necessary and segregated for temporary storage onsite for eventual disposal. All decontamination liquids will be collected, drummed, and stored onsite for eventual disposal. All non-contaminated materials will be collected and bagged for appropriate disposal as normal domestic waste. It is important to note that a hazardous waste determination (either by knowledge of the waste or by analytical testing) must be performed on all waste materials destined for disposal, and all appropriate approvals, handling, transportation, and disposal methods must observe applicable Resource Conservation and Recovery Act (RCRA) regulations. Hazardous Waste shall be transported by an EPA licensed hazardous waste transporter to an EPA licensed hazardous waste treatment, storage, or disposal facility.

3.9 Contingency Plan Review and Submittal

In accordance with 40 CFR 265.54 and 29 CFR 1910.120, under the following conditions, the Contingency Plan should be reviewed and immediately revised:

- Applicable regulations are revised;
- The plan fails in an emergency;
- 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;
- The list of emergency coordinators changes; or
- The list of emergency equipment changes.

New employees should be familiarized with all emergency response procedures.

In accordance with 40 CFR 265.53, a copy of the Contingency Plan and all revisions must be maintained at the facility and submitted to the following parties:

1. Local Police Department
   Phoenix Police Department
   620 W Washington Street
   Phoenix, AZ 85003
2. Local Fire Department
   Phoenix Fire Department
   2409 W Cactus Road
   Phoenix, AZ 85029
3. Local Hospital
   Honor Health Deer Valley Medical Center
   19829 N 27th Ave,
   Phoenix, AZ 85027
4. Local Emergency Planning Committee (LEPC)
   Maricopa County
   5630 E. McDowell Road
   Phoenix, AZ 85008
5. Arizona State Emergency Response Commission (SERC)
   SERC
   c/o Department of Environmental Quality
   1110 W Washington Street
   Phoenix, AZ 85007

CS Clean will complete the following:

Familiarize the police and fire departments with:

- The layout of the facility
- Properties and hazards associated with the wastes handled at the facility
- Places where facility personnel would normally be working
- Entrances to the facility
- Evacuation routes

The Phoenix Police Department will be requested to provide the following assistance during an emergency:

- Immediate response
- Crowd control assistance
- Security to affected area
- Evacuation of surrounding areas, if required

- Communications support, if required

The Phoenix Fire Department will be requested to provide:

- Primary emergency authority
- Immediate response
- Primary fire-fighting services

Honor Health Deer Valley Medical Center will be requested to provide:

- Transfer to hospital
- Primary medical services
- Rescue services

3.10 Location of Contingency Plan

Copies of the Contingency Plan will be kept on an internal internet page CS Clean offered to all employees, in the main office area, and at the administrative assistant's office at the front entry.

4.0 FEDERAL, STATE, AND LOCAL REPORTING REQUIREMENTS

A variety of Federal, State, and Local reporting requirements exist for the reporting of emergencies and chemical releases. Provided below is a general description of the criteria for reporting under various regulations. It is the Emergency Coordinator's responsibility to follow the reporting requirements when applicable. The Emergency Coordinator may also designate a competent person to conduct these activities.

For the readers' convenience the table below summarizes reporting contacts.

Table 4
EMERGENCY REPORTING LIST

Report Contact Name	Type	Phone Number
Emergency	**N/A**	**911**
National Response Center	Federal	800-424-8802
EPA Region 9	Federal	800-300-2193
Arizona DEQ – Spill Hotline	State	602-771-2330 or 800-234-5677
Arizona – State Emergency Response Commission	State	602-771-8786
Maricopa County Local Emergency Planning Committee	LEPC	602-273-1411
Arizona Occupations Safety and Health Administration – Phoenix Office	Federal	602-542-5795
Phoenix Fire Department	City	602-495-5555

Table 4 EMERGENCY REPORTING LIST		
Report Contact Name	**Type**	**Phone Number**
Phoenix Police Department	State	602-262-6151
Phoenix Water Services Department	Water / Sewer Authority	602-262-6251

Section 311(b)(5) of the Clean Water Act (CWA), codified as 40 CFR 110, establishes reporting requirements for the release of oils into navigable waters, including wetlands. Releases of oil to navigable waters that: (1) cause a sheen to appear on the surface; (2) violate applicable water quality standards; or (3) cause a sludge or emulsion to be deposited beneath the surface of the water or adjoining shorelines must be reported to the NRC at 800-424-8802. Notification must be submitted as soon as the facility Emergency Coordinator has knowledge of any discharge.

In the event a release threatens drinking water, stormwater, or sewer system contact the Phoenix Water Services Department (602-262-6251) and ADEQ (602-771-2330 or 800-234-5677).

If a spill of material of any amount threatens to reach navigable waters, the NRC (800-424-8802) shall be contacted.

The Emergency Coordinator should be ready to report the following information:

- Your name, location, organization, and telephone number;
- Name and address of the party responsible for the incident;
- Date and time of the incident;
- Location of the incident;
- Source and cause of the release or spill;
- Types of material(s) released or spilled;
- Quantity of materials released or spilled;
- Danger or threat posed by the release or spill;
- Number and types of injuries (if any);
- Weather conditions at the incident location; and
- Any other information that may help emergency personnel respond to the incident.

Navigable waters of U.S. are defined in 40 CFR Part 110.1 to include interstate waterways or intrastate waterways including lakes, rivers, and streams which may be utilized by interstate travelers for recreational purposes. Navigable waters also include lakes, rivers, and streams from which fish or shellfish are taken. The complete definition may be found in Section 502(7) of the Federal Water Pollution Control Act. In the event of a large volume release, oil products and reportable quantities of materials could potentially enter the nearby Mill River.

After a spill or release of oil greater than 1,000 gallons or after two spills of oil greater than 42 gallons within any twelve-month period, or if the spill impacted a navigable waterway, the Emergency Coordinator will report the event(s) to the following agency within sixty days.

The Regional Administrator
U.S. Environmental Protection Agency – Region 9
U.S. EPA Pacific Southwest, Region 9
75 Hawthorne Street
San Francisco, CA 94105
Phone: 415-947-8000

The EPA report will include:

- Name of the facility;
- Your name;
- Location of the facility;
- Maximum storage or handling capacity of the facility and normal daily throughput;
- Corrective action and countermeasures you have taken, including a description of equipment repairs and replacement;
- An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
- The cause of the discharge, including a failure analysis of the system or subsystem in which the failure occurred;
- Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence; and
- Such other information as the Regional Administrator may reasonably require pertinent to the Plan or spill event.

As required by EPA Federal Regulation 40 CFR 112.5(c), a copy of the EPA report will also be submitted to ADEQ at the following address:

Arizona Department of Environmental Quality
Attn: Emergency Response and Spill Prevention
1110 W. Washington St.
Phoenix, AZ 85007

4.1 Comprehensive Environmental Response, Compensation, and Liability Act Releases (Federal)

Section 104 of CERCLA (also known as "Superfund"), codified at 40 CFR 302, requires that if greater than the RQ of a CERCLA hazardous substance is released from a facility over a 24-hour period, the Emergency Coordinator, as soon as they have knowledge of the release, must notify the NRC (800-424-8802). Reportable releases include any release to the environment, either to air, land, or water,

except for certain continuous releases. It should be noted that a release contained entirely within the building constitutes a release under CERCLA, and if more than the RQ is released to air, land or water, the release is reportable.

4.2 Hazardous Materials Transportation Act (HMTA) Notification (Federal)

Under 49 CFR 171.15, if a release of hazardous materials occurs in transport (including loading or unloading) which causes injury or death, property damage over $50,000, public evacuation or major road closure lasting more than one hour, aircraft re-routing, spillage or fire of a radioactive or disease-causing material, or continuing endangerment of life at the scene of the incident exists, then the carrier must notify the Department of Transportation via the NRC at 1-800-424-8802. Each notice must include the following information:

1. Name of Reporter;
2. Name and address of carrier;
3. Phone number where reporter can be reached;
4. Date, time, and location of incident;
5. The extent of injuries, if any;
6. Type and quantity of materials involved; and
7. Type of incident and whether continuing danger of life exists at the scene.

The carrier must also submit a written report regarding the incident within thirty days, and if any unintentional release of hazardous material occurs (under conditions not necessarily listed above), a written report must be submitted.

4.3 Superfund Amendments and Re-Authorization Act Releases (Federal)

Under 40 CFR 355.40, releases of CERCLA hazardous substances of Extremely Hazardous Substances (EHSs) (see http://www2.epa.gov/sites/production/files/2013-08/documents/list_of_lists.pdf) above the RQ must be reported to the SERC at 602-771-0397 and the LEPC at 602-273-1411 by the owner or operator of the facility, and must include the following information:

- The chemical name of identity of the substance released;
- Whether the substance is an EHS;
- The quantity released;
- Time and duration of the release;
- The medium or media into which the release occurred;
- Any relevant medical information (health risks, etc.);
- Precautions to take, including evacuation; and
- The name and telephone number of the person to contact for further information.

As soon as practicable after reporting the release, the owner or operator must submit a written report of the incident and information listed above which additionally includes the following information:

- Actions taken to respond to and contain the release;
- Any acute and chronic health effects from the release; and
- Any advice regarding medical attention necessary for exposed individuals.

Several exemptions to this reporting requirement are provided under paragraph 355.40(a) (2), which should be carefully reviewed to determine if reporting is required.

4.4 State Spill and Release Requirements

Under Arizona's statutes, any oil or petroleum products, chemical or waste that is released in any manner and in any amount constitutes a "spill" and must immediately be reported to the Oil and Chemical Spills section of the ADEQ at 602-771-2330. Providing the following information:

- Name, address, and telephone number of the reporter;
- Name and address of the facility;
- Time and type of incident (e.g., release, fire);
- Name and quantity of material(s) involved, to the extent known;
- The extent of injuries, if any; and
- The possible hazards to public health, or the environment, outside the facility.

A follow-up written report to the same section of the ADEQ is required to be completed within fifteen days. The written report will include:

- Name, address, and telephone number of the generator;
- Date, time, and type of incident (i.e., fire, explosion);
- Name and quantity of material(s) involved;
- Extent of injuries, if any;
- An assessment of actual or potential hazards to public health or the environment; and
- Estimated quantity and disposition of recovered material from the incident.

5.0 TRAINING

5.1 Contingency Plan and Emergency Action Plan Training

To comply with both state and federal regulations, CS Clean must provide and maintain a training program that will ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems. This training program consists of both in-house classroom training as well as on-the-job training.

In-house training will be conducted by a competent and qualified training instructor familiar with this Plan's requirements. On-the-job training consists of employees completing job tasks under the guidance and supervision of another fully-trained employee. No person will be allowed to work with hazardous materials unsupervised until the training requirements set forth as appropriate for the particular job title have been successfully completed. Newly hired or newly assigned employees will have the necessary job training completed within six months of their job placement. Also, employees involved in hazardous waste management will be provided training annually.

The intent of the training program is to provide the employee with the necessary knowledge and skills to perform the functions of their job title in a safe manner and to maintain compliance with state and federal regulations.

Pursuant to 40 CFR 262.17(a)(7) and 29 CFR 1910.38(e), personnel will be specifically trained in the following emergency response areas:

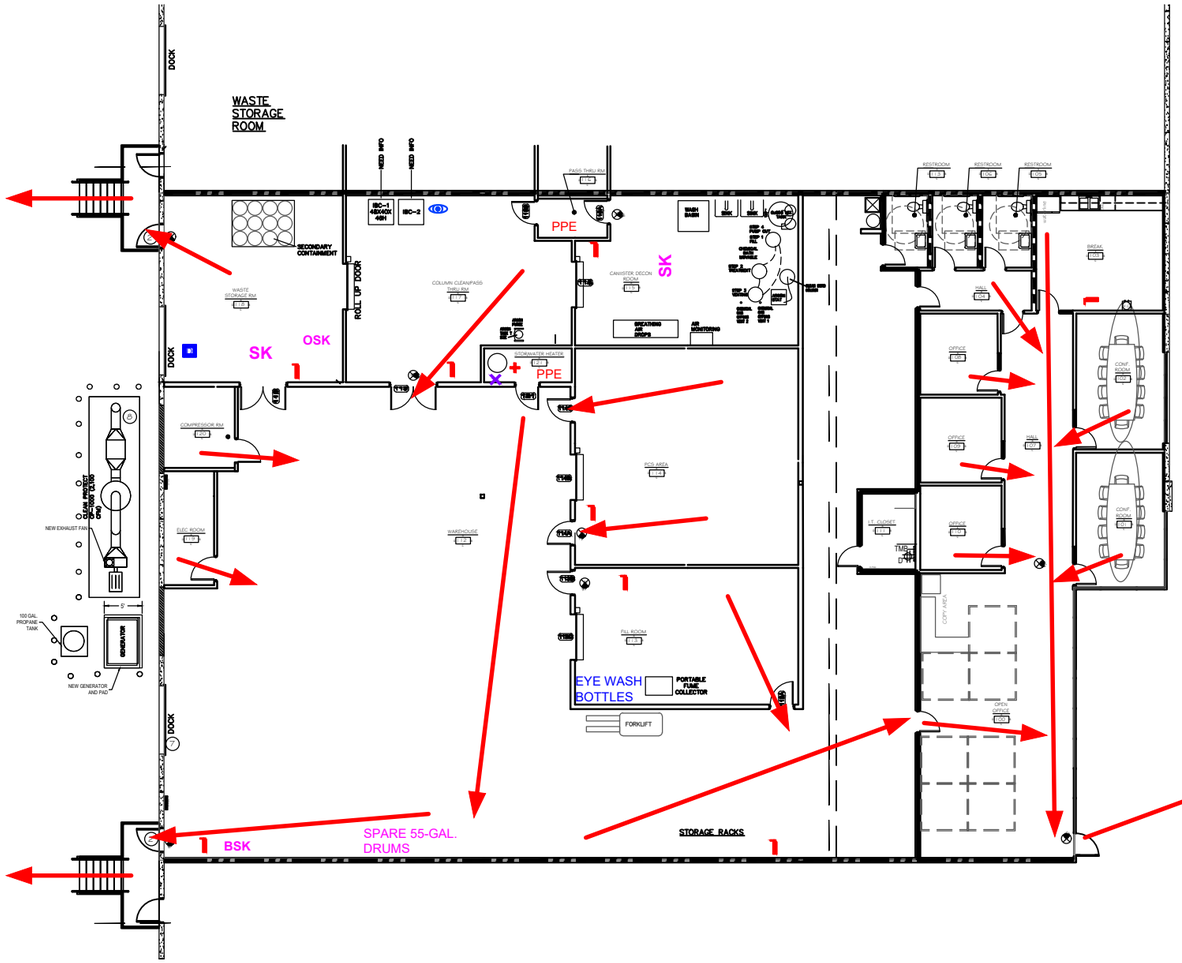
- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- Key parameters for automatic waste feed cut-off systems;
- Communications or alarm systems;
- Response to fires or explosions;
- Response to groundwater contamination incidents;
- Shutdown operations; and
- Train employees to assist in a safe and orderly evacuation of other employees.

Hazardous waste management duties and responsibilities vary for each job title. Also, the training for certain jobs may overlap with the training for similar jobs. Therefore, there is variation associated with the necessary training for each job title. Training records shall be maintained for the duration of an employee's employment to satisfy OSHA emergency action plan training requirements.

5.2 Emergency Response Drills

Per the National Fire Protection Association (NFPA) 101 (2015), CS Clean will perform periodic emergency response drills (i.e., annually). The drill procedures, schedule, and log are maintained separately in company files.

FIGURES



HRP
MOVE YOUR ENVIRONMENT FORWARD
197 SCOTT SWAMP ROAD
FARMINGTON, CT 06032
(860) 674-9570
HRPASSOCIATES.COM

NORTH

0 10' 20'

REVISIONS	
NO.	DATE

DESIGNED BY:	REVIEWED BY:	ISSUE DATE:
DSW	DSW	05/23/2025
DRAWN BY:	PROJECT NUMBER:	SHEET SIZE:
BOB	CSC0011.PS	11"x17"

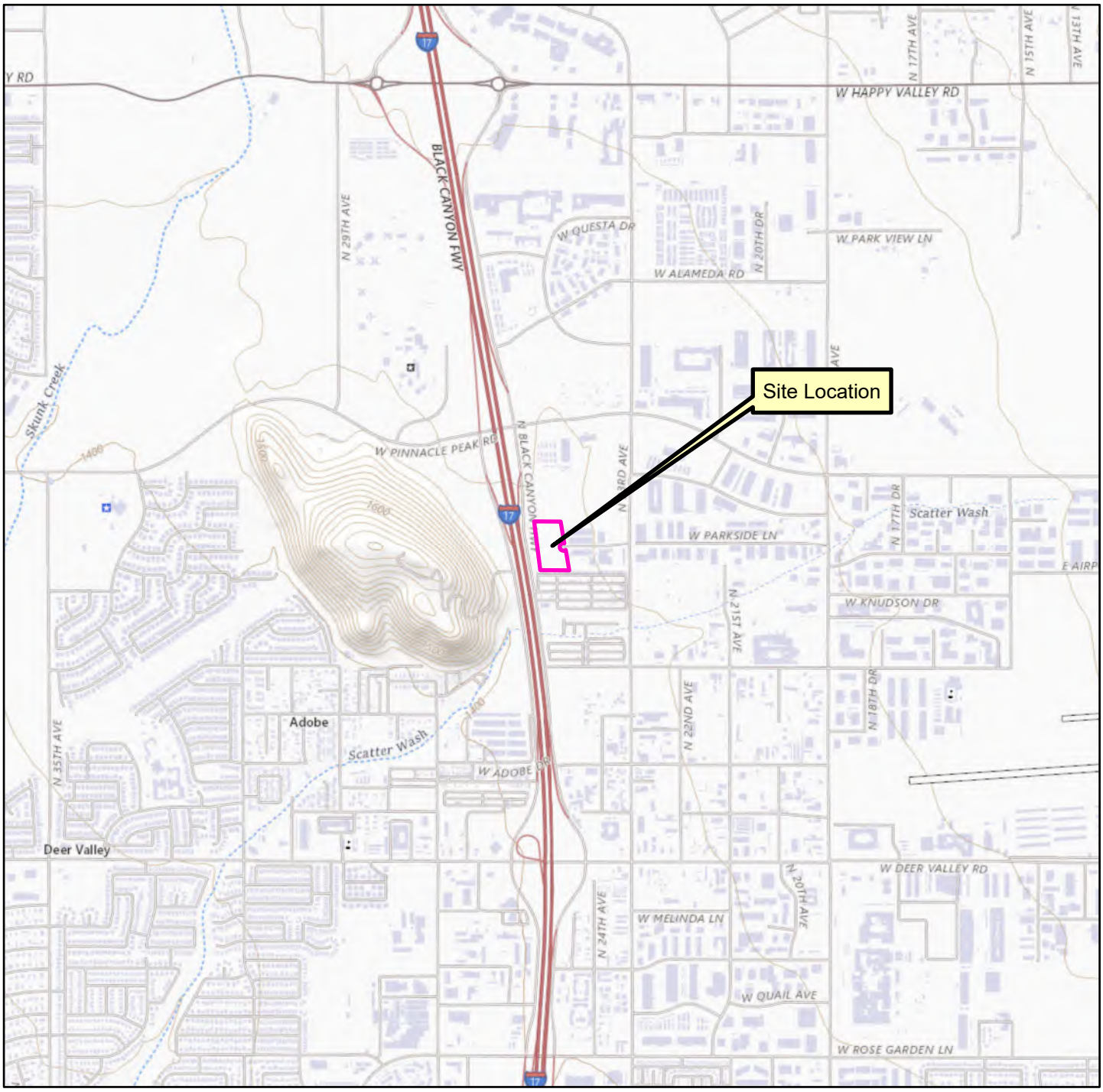
SITE PLAN

CS CLEAN SYSTEMS, INC.

2453 W PARKSIDE LANE, SUITES 150
PHOENIX, ARIZONA

FIGURE NO.

1



USGS Quadrangle Information
Quad ID: 33112-F1
Name: Union Hills, Arizona

Figure 2
Site Location
CS Clean Systems, Inc.
2453 W Parkside Lane
Suites 150
Phoenix, Arizona
HRP # CSC0011.PS
Scale 1" = 2,000'

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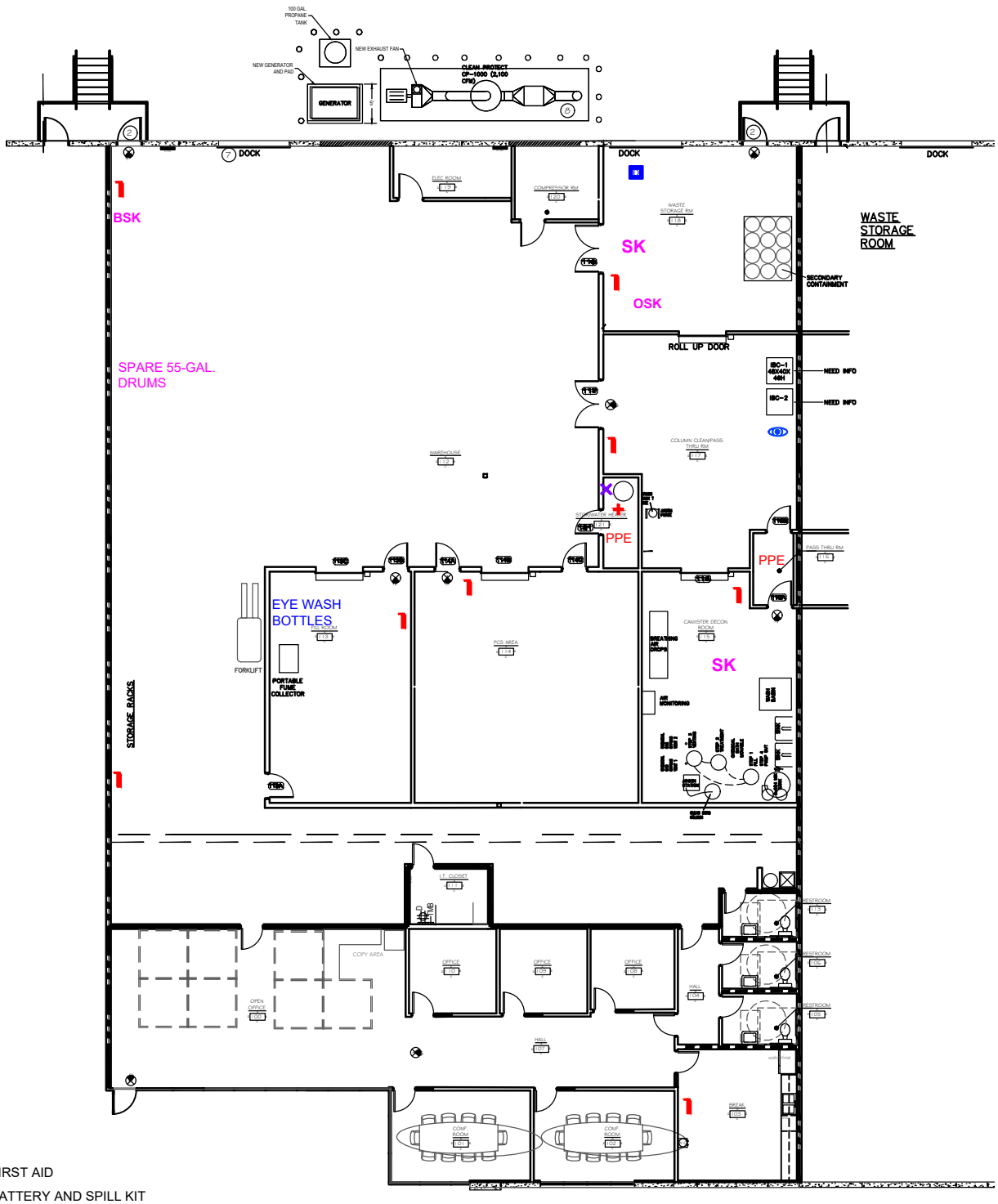
(860) 674-9570
HRPASSOCIATES.COM

Path: J:\CIC\SCLE - CS CLEAN SYSTEMS, INC\PHOENIX, ARIZONA\CSC0011PS\GIS\Figures\Figures.aprx



✚-FIRST AID

BSK-BATTERY AND SPILL KIT

SK -SPILL KIT, (WASTE OIL, WATER, UNIVERSAL WASTE, COOLANT, SOLVENTS)

✕-LOTO EQUIPMENT

OSK-95 GAL. OVERPACK SPILL KIT

-SPILL BLOCKER DIKE

-FIRE EXTINGUISHER

-EYEWASH

0 10' 20'

NORTH

MAP REFERENCE: SHEET IA-2, CS CLEAN SYSTEMS INC. 2453 W PARKSIDE LN, SUITES 150, PHOENIX, AZ BY A DESIGN IN VISION OF GOODYEAR, ARIZONA; PROJECT NO. 22350; DATE: 4/12/23.

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FARMINGTON, CT 06032
(860) 674-9570
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EMERGENCY EQUIPMENT

CS CLEAN SYSTEMS, INC.

2453 W PARKSIDE LANE, SUITES 150, PHOENIX, AZ

SCALE: 1" = 20'

ISSUE DATE: 02/27/2025

PROJECT NUMBER: CSC0011.PS

Fig. 3

SHEET NO.

DRAWING NAME: J:\CSCLE - CS CLEAN SYSTEMS, INC\PHOENIX, ARIZONA\CSC0011PS\CAD\Building Plan.dwg LAYOUT: FIGURE 1 SITE PLAN PLOT DATE: Feb 27, 2025 - 9:49am OPERATOR: BOB

APPENDIX A
Hazardous Waste Inspections

Name of Inspector: _____ **Date of Inspection:** _____

Time of Inspection: _____

DAILY INSPECTION LOG WASTE STORAGE AREA CS CLEAN SOLUTIONS, INC. 2453 WEST PARKSIDE LANE, SUITE 150 PHOENIX, AZ			
Inspection Item	**Types of Problems**	**Problem? Yes/No**	**Date and Type of Repair Performed (if applicable)**
Building Observations			
No evidence of spills/leaks	Accumulated liquid on floor or secondary containment, wet spots		
Floor, berms, and other surfaces are in acceptable condition	Cracks, erosion, uneven settlement		
Warning signs posted and in acceptable condition	Blocked, damaged, missing, deteriorated		
Housekeeping practices acceptable	Obstruction, aesthetics, unauthorized materials storage		
Material Storage Observations			
Containers and bulk containers in acceptable condition	Cracks, dents, corrosion, signs of leaks or spills		
Placement and storage acceptable	Drum aisle spacing: 30" (minimum), height of stack: 1 high maximum		
Containers, bulk containers, and columns closed and secured	Open lids or bungs		
Labeling of containers and storage bulk containers	Improper identification, missing labels, accumulation date missing		
Storage capacity is not exceeded	$\geq$10 55-gallon containers, $\geq$10 spent columns, >2 275-gallon totes		
Wastewater bulk container is provided with start accumulation date	Missing label, date		

Name of Inspector: _____ **Date of Inspection:** _____

Time of Inspection: _____

DAILY INSPECTION LOG **WASTE STORAGE AREA** **CS CLEAN SOLUTIONS, INC.** **2453 WEST PARKSIDE LANE, SUITE 150** **PHOENIX, AZ**			
Inspection Item	**Types of Problems**	**Problem? Yes/No**	**Date and Type of Repair Performed (if applicable)**
Waste material holding time within maximum limit	1-year maximum handling time for spent granulate material from delivery to disposal (applies only to off-site, non-reclaimed waste storage). 90-days for onsite generated wastes.		
Secondary Containment	Secondary containment present and capable of supporting 110% of largest container		
Compatible Waste	Incompatible waste is stored so that spill will not comingle		
Wastewater generation log is available and in-use	Missing generation log, not in use		
Wastewater storage duration has not exceeded permit limitations	Limitations based on hazardous waste generator status (<90 days)		

Name of Inspector: _____ **Date of Inspection:** _____

Time of Inspection: _____

WEEKLY INSPECTION LOG PREPARATION AREA CS CLEAN SOLUTIONS, INC. 2453 WEST PARKSIDE LANE, SUITE 150 PHOENIX, AZ			
Inspection Item	**Types of Problems**	**Problem? Yes/No**	**Date and Type of Repair Performed (if applicable)**
Building Observations			
No evidence of spills/leaks	Accumulated liquid on floor or in trench, wet spots		
Floor, berms, and other surfaces are in acceptable condition	Cracks, erosion, uneven settlement		
Warning signs posted and in acceptable condition	Blocked, damaged, missing, deteriorated		
Aisle Space	30 inches of aisle space maintained		
Housekeeping practices acceptable	Obstruction, aesthetics, unauthorized materials storage		
Material/Equipment Observations			
Fill and drain valves secured and in good condition	Leaks, deterioration		
Wastewater transfer piping and pumps in good condition	Leaks, dents, corrosion, deterioration		
Containers, bulk containers, and columns closed and secured (in-use)	Open lids or bungs		
Storage capacity is not exceeded	No storage of spent columns or waste		

Name of Inspector: _____ **Date of Inspection:** _____

Time of Inspection: _____

WEEKLY INSPECTION LOG WASTE MATERIAL TRANSFER AREA CS CLEAN SOLUTIONS, INC. 2453 WEST PARKSIDE LANE, SUITE 150 PHOENIX, AZ			
Inspection Item	**Types of Problems**	**Problem? Yes/No**	**Date and Type of Repair Performed (if applicable)**
Building Observations			
No evidence of spills/leaks	Accumulated liquid on floor or in trench, wet spots		
Floor, berms, and other surfaces are in acceptable condition	Cracks, erosion, uneven settlement		
Warning signs posted and in acceptable condition	Blocked, damaged, missing, deteriorated		
Aisle space	30 inches of aisle space maintained		
Housekeeping practices acceptable	Obstruction, aesthetics, unauthorized materials storage		
Material/Equipment Observations			
Tanks and bulk containers in good condition	Leaks, dents, corrosion, deterioration		
Fill and drain valves secured and in good condition	Leaks, deterioration		
Wastewater transfer piping in good condition	Leaks, dents, corrosion, deterioration		
Containers, bulk containers, and columns closed and secured (in-use)	Open lids or bungs		
Storage capacity is not exceeded	No storage of spent columns, only satellite storage area		

Name of Inspector: _____ **Date of Inspection:** _____

Time of Inspection: _____

WEEKLY INSPECTION LOG SHIPPING AND RECEIVING AREA CS CLEAN SOLUTIONS, INC. 2453 WEST PARKSIDE LANE, SUITE 150 PHOENIX, AZ			
Inspection Item	**Types of Problems**	**Problem? Yes/No**	**Date and Type of Repair Performed (if applicable)**
Building Observations			
No evidence of spills/leaks	Accumulated liquid on floor or in trench, wet spots		
Floor, berms, and other surfaces are in acceptable condition	Cracks, erosion, uneven settlement		
Warning signs posted and in acceptable condition	Blocked, damaged, missing, deteriorated		
Aisle space	30 inches of aisle space maintained		
Housekeeping practices acceptable	Obstruction, aesthetics, unauthorized materials storage		
Material Storage Observations			
Shipping containers in acceptable condition	Cracks, dents, corrosion, signs of leaks or spills		
Storage capacity is not exceeded	No storage of spent columns or wastes		

Name of Inspector: _____ **Date of Inspection:** _____

Time of Inspection: _____

WEEKLY INSPECTION LOG **DONNING AND DOFFING PASSTHROUGH AREA** **CS CLEAN SOLUTIONS, INC.** **2453 WEST PARKSIDE LANE, SUITE 150** **PHOENIX, AZ**			
Inspection Item	**Types of Problems**	**Problem? Yes/No**	**Date and Type of Repair Performed (if applicable)**
Building Observations			
No evidence of spills/leaks	Accumulated liquid on floor or in trench, wet spots		
Floor, berms, and other surfaces are in acceptable condition	Cracks, erosion, uneven settlement		
Warning signs posted and in acceptable condition	Blocked, damaged, missing, deteriorated		
Aisle space	30 inches of aisle space maintained		
Housekeeping practices acceptable	Obstruction, aesthetics, unauthorized materials storage		
Material Storage Observations			
Storage capacity is not exceeded	No storage of spent columns or wastes		

Name of Inspector: _____ **Date of Inspection:** _____

Time of Inspection: _____

MONTHLY INSPECTION LOG – EMERGENCY AND SAFETY SYSTEMS WASTE MATERIAL TRANSFER ROOM,WASTE STORAGE AREA, PREPARATION AREA, AND SHIPPING AND RECEIVING AREA CS CLEAN SOLUTIONS, INC. 2453 WEST PARKSIDE LANE, SUITE 150 PHOENIX, AZ			
Inspection Item	**Types of Problems**	**Problem? Yes/No**	**Date and Type of Repair Performed (location if applicable)**
All fire extinguishers visible and accessible	Not properly identified, missing, not mounted securely		
All fire extinguishers fully charged	Not adequately charged		
Fire alarm system functioning properly and has been tested in the past year	Pull boxes not functioning properly, loss of water pressure or alarm signal for sprinklers		
At least 18-inch clearance provided for all sprinkler heads	Material or equipment storage issues		
Smoke alarms functioning correctly	Loss of power, blocked, damaged		
All exits marked with exit signs and illuminated	Missing signage, loss of power, damaged		
Evacuation plans posted near doors and/or common areas	Missing signage, not accurate, not sufficient size		
All doorways and hallways leading to an exit free and clear and provided illumination	Material or equipment storage issues, loss, or power, damaged		
Emergency notification equipment including telephone and/or paging system operational	Loss of power, blocked, damaged		
Emergency phone numbers posted	Missing signage, not accurate		
Emergency lights functioning correctly	Loss of power, blocked, damaged		
First aid kits visible and accessible	Not properly identified, missing, not accessible		
First aid kits stocked as required and expiration dates current	Depleted or missing inventory, expired components		

Name of Inspector: _____ **Date of Inspection:** _____

Time of Inspection: _____

MONTHLY INSPECTION LOG – EMERGENCY AND SAFETY SYSTEMS WASTE MATERIAL TRANSFER ROOM,WASTE STORAGE AREA, PREPARATION AREA, AND SHIPPING AND RECEIVING AREA CS CLEAN SOLUTIONS, INC. 2453 WEST PARKSIDE LANE, SUITE 150 PHOENIX, AZ			
Inspection Item	**Types of Problems**	**Problem? Yes/No**	**Date and Type of Repair Performed (location if applicable)**
Eye wash stations and safety showers inspected and functioning properly	Low water pressure, leaking, draining		
PPE readily available and in good condition	Broken, dirty, missing equipment (includes air supply system, respirators, chemical resistant clothing, eye protection, gloves)		
Spill kits readily available and include adequate materials	Missing, damaged, not accessible		
Duct flow pressure gauge operating correctly	Damaged, loss of power, faulted		
Ventilation	HEPA present and functioning, Cleanprotect operating		
Liquid level switch operating correctly	Damaged, loss of power, faulted		
Gas/O_2 Detection System calibrated and operating correctly	Expired calibration, damaged, loss of power, faulted		
Emergency Generator	Checked for operation in loss of power, maintained		
Uninterruptible Power Supply (UPS)	Checked for operation in loss of power, maintained		

Name of Inspector: _____ **Date of Inspection:** _____

Time of Inspection: _____

WEEKLY INSPECTION LOG – EMERGENCY AND SAFETY SYSTEMS **WASTE MATERIAL TRANSFER ROOM,WASTE STORAGE AREA, PREPARATION AREA, AND SHIPPING AND RECEIVING AREA** **CS CLEAN SOLUTIONS, INC.** **2453 WEST PARKSIDE LANE, SUITE 150** **PHOENIX, AZ**			
Inspection Item	**Types of Problems**	**Problem? Yes/No**	**Date and Type of Repair Performed (location if applicable)**
Eye wash stations and safety showers inspected and functioning properly	Low water pressure, leaking, draining		
PPE readily available	Includes air supply system, respirators, chemical resistant clothing, eye protection, gloves in stock		
Respirators in good condition	Respirator components (mouthpiece, supplied air systems, connections), broken or damaged, dirty.		
Chemical resistant clothing	Good condition, no holes, damage, or dirty/used equipment.		
Gloves	Good condition, no holes, damage, or dirty/used equipment.		
Eye protection	Good condition, no holes, damage, or dirty/used equipment.		

Name of Inspector: _____ **Date of Inspection:** _____

Time of Inspection: _____

MONTHLY INSPECTION LOG – SECURITY WASTE MATERIAL TRANSFER ROOM. WASTE STORAGE AREA, PREPARATION AREA, AND SHIPPING AND RECEIVING AREA CS CLEAN SOLUTIONS, INC. 2453 WEST PARKSIDE LANE, SUITE 150 PHOENIX, AZ			
Inspection Item	**Types of Problems**	**Yes/No**	**Date and Type of Repair Performed (Location if applicable)**
Facility perimeter fence in acceptable condition	Damaged, deteriorated, missing		
Warning signs posted and in acceptable condition	Missing, damaged		
Building security system operating correctly	Damaged, loss of power, notifications not provided		
All doors and key card system operational	Damaged, cannot close or lock		
Lighting on interior and exterior adequate	Damaged bulbs, loss of power		

APPENDIX B

Hazardous Materials Identification System Spreadsheet

HMIS - Hazardous Material Inventory Statement (Part-2)

Business Name: CS Clean Solutions, Inc. **Address:** 2453 West Parkside Lane, Suite 150 Phoenix, Arizona 85027 **Store #:** **Date:** 4/25/2023

Complete By: David Webster and Jason Dugay **Telephone:** (203) 456-6087

On-Site Generator – If Yes, enter fuel qty & type. **Fuel Qty:** ~120 gallons **Fuel Type:** Propane

On-Site Fuel Pump – If Yes, enter fuel qty & type. **Fuel Qty:** **Fuel Type:**

① Indoor Storage	Outdoor Storage	② Chemical or Trade Name	③ Conc. %	④ CAS Number	⑤ PFC Hazard Classification	⑥ Physical State	⑦ Total Amt on Property	⑧ NFPA 704 RATING			⑨ Tank(s) (Above Ground Only)
Mark with an "X"						List: (Solid, Liquid or Gas)	List: (Pounds, Gallons or Cubic ft).	H	F	R	Enter Number
X		Argon	100%	7440-37-1	Compressed Gas	Gas	120 cubic ft	0	0	0	0
X		Nitrogen	100%	7727-37-9	Compressed Gas	Gas	120 cubic ft	0	0	0	0
X		Copper Sulfate Pentahydrate	99%	7758-99-8	Toxic	Solid	100 lbs	2	0	0	1
X		CLEANSORB CS3F	100%	Proprietary Copper Compound	Toxic	Solid	22,000 lbs	2	0	0	0
X		CLEANSORB CS3G	<20%	Proprietary Copper Compound	Corrosive	Solid	1,325 lbs	1	0	0	0
X		CLEANSORB CS5	MIX	1313-13-9 <100% 1317-38-0 <25%	Toxic	Solid	1,325 lbs	2	0	1	0

HMIS - Hazardous Material Inventory Statement (Part-2)

Business Name: CS Clean Solutions, Inc. **Address:** 2453 West Parkside Lane, Suite 150 Phoenix, Arizona 85027 **Store #:** **Date:** 4/25/2023

Complete By: David Webster and Jason Dugay **Telephone:** (203) 456-6087

On-Site Generator – If Yes, enter fuel qty & type. **Fuel Qty:** ~120 gallons **Fuel Type:** Propane

On-Site Fuel Pump – If Yes, enter fuel qty & type. **Fuel Qty:** **Fuel Type:**

① Indoor Storage	Outdoor Storage	② Chemical or Trade Name	③ Conc. %	④ CAS Number	⑤ PFC Hazard Classification	⑥ Physical State	⑦ Total Amt on Property	⑧ NFPA 704 RATING			⑨ Tank(s) (Above Ground Only)
Mark with an "X"						List: (Solid, Liquid or Gas)	List: (Pounds, Gallons or Cubic ft).	H	F	R	Enter Number
X		Waste - MOCVD Tool Exhaust	MIX	1317-38-0 10-50% 12005-75-3 10-30% 12019-57-7 10-30%	Pyrophoric Unstable / Reactive Toxic	Solid	880 lbs	2*	0	0	0
X		Waste - Ion Implant abatement	MIX	7440-38-2 >1% 142844-00-6 20-40% 1309-48-4 20-40%	Toxic	Solid	1760 lbs	3*	0	0	0
X		Waste - Exhaust Scrubber Granular	MIX	7784-18-1 20-40% 7783-40-6 20-40%	Corrosive	Solid	1760 lbs	2*	0	0	0

Insert additional lines as needed.

* NFPA 704 for highest hazard component that is apart of waste stream.

APPENDIX C
Notifications to Local Agencies

MOVE YOUR ENVIRONMENT FORWARD

October 27, 2025

Mike Duran III
Fire Chief
City of Phoenix Fire Department
2409 W Cactus Road
Phoenix, AZ 85029

RE: CONTINGENCY PLAN, CS CLEAN SYSTEMS, 2453 WEST PARKSIDE LANE, SUITE 150, PHOENIX, ARIZONA
(HRP #CSC0011.PS)

Dear Chief Duran:

Attached please find the contingency plan for CS Clean Systems at 2453 West Parkside Lane, Suite 150, Phoenix, Arizona. This plan has been updated and supplied to the Phoenix Fire Department and Local Emergency Planning Committee in compliance with applicable federal and state regulations.

If you have any questions or require additional information, please feel free to contact HRP Associates, Inc. at (860) 674-9570.

Sincerely,

Chelsea Thompson
Associate Consultant

David Webster, CSP
Senior EH&S Project Manager

Attachment

ATTACHMENT 1

Hazardous Waste Contingency and Emergency Action Plan

MOVE YOUR ENVIRONMENT FORWARD

October 27, 2025

Honor Health Deer Valley Medical Center
19829 N 27th Avenue,
Phoenix, AZ 85027

RE: CONTINGENCY PLAN, CS CLEAN SYSTEMS, 2453 WEST PARKSIDE LANE, SUITE 150, PHOENIX, ARIZONA 85027
(HRP #CSC0011.PS)

To Whom It May Concern:

Attached please find the contingency plan for CS Clean Systems (CS Clean) at 2453 West Parkside Lane, Suite 150, Phoenix, Arizona. This plan has been updated and supplied to the Urgent Care Facility in compliance with applicable state and federal regulations. Should the need to send an employee of CS Clean to Honor Health Medical Center due to a work-related injury or an overexposure to any chemicals onsite, CS Clean will submit all SDSs (Safety Data Sheets) for chemicals that the employee had encountered.

If you have any questions or require additional information, please feel free to contact HRP Associates, Inc. at (860) 674-9570.

Sincerely,

Chelsea Thompson
Associate Consultant

David Webster, CSP
Senior EH&S Project Manager

Attachment

ATTACHMENT 1

Hazardous Waste Contingency and Emergency Action Plan

MOVE YOUR ENVIRONMENT FORWARD

October 27, 2025

Michael Branham
Maricopa County LEPC
5630 E. McDowell Road
Phoenix, AZ 85008

RE: CONTINGENCY PLAN, CS CLEAN SYSTEMS, 2453 WEST PARKSIDE LANE, SUITE 150, PHOENIX, ARIZONA
(HRP #CSC0011.PS)

Dear Mr. Branham:

Attached please find the contingency plan for CS Clean Systems at 2453 West Parkside Lane, Suite 150, Phoenix, Arizona. This plan has been supplied to the Phoenix Fire Department and Local Emergency Planning Committee in compliance with state and federal regulations.

If you have any questions or require additional information, please feel free to contact HRP Associates, Inc. at (860) 674-9570.

Sincerely,

Chelsea Thompson
Associate Consultant

David Webster, CSP
Senior EH&S Project Manager

Attachment

ATTACHMENT 1

Hazardous Waste Contingency and Emergency Action Plan

MOVE YOUR ENVIRONMENT FORWARD

October 27, 2025

Chief Michael Sullivan
City of Phoenix Interim Police Chief
620 W Washington Street
Phoenix, AZ 85003

RE: CONTINGENCY PLAN, CS CLEAN SYSTEMS, 2453 WEST PARKSIDE LANE, SUITE 150, PHOENIX, ARIZONA 85027
(HRP #CSC0011.PS)

Dear Chief Sullivan:

Attached please find the contingency plan for CS Cean Systems at 2453 West Parkside Lane, Suite 150, Phoenix, Arizona. This plan has been updated and supplied to the City of Phoenix Police Department in compliance with applicable state and federal regulations.

If you have any questions or require additional information, please feel free to contact HRP Associates, Inc. at (860) 674-9570.

Sincerely,

Chelsea Thompson
Associate Consultant

David Webster, CSP
Senior EH&S Project Manager

Attachment

ATTACHMENT 1

Hazardous Waste Contingency and Emergency Action Plan

MOVE YOUR ENVIRONMENT FORWARD

October 27, 2025

Laura Malone
AZ State Emergency Response Commission
City of Phoenix
1110 W Washington Street
Phoenix, Arizona 85007

RE: CONTINGENCY PLAN, CS CLEAN SYSTEMS, 2453 WEST PARKSIDE LANE, SUITE 150, PHOENIX, ARIZONA
(HRP #CSC0011.PS)

Dear Ms. Malone:

Attached please find the contingency plan for CS Clean Systems at 2453 West Parkside Lane, Suite 150, Phoenix, Arizona. This plan has been supplied to the City of Phoenix in compliance with state and federal regulations.

If you have any questions or require additional information, please feel free to contact HRP Associates, Inc. at (860) 674-9570.

Sincerely,

Chelsea Thompson
Associate Consultant

David Webster, CSP
Senior EH&S Project Manager

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