ATTACHMENT G

AA SYDCOL, LLC
CONTINGENCY PLAN
FOR RCRA HAZARDOUS WASTES
[270.A (270.14(b)(7); 264.d]

July 13, 2021

TABLE OF CONTENTS

1.0 INTRODUCTION 1
1.1 Contingency Plan Regulations 1
1.2 Contingency Plan Purpose 1
1.3 Contingency Plan Requirements 1
1.4 Amendments to the Plan 1
2.0 FACILITY INFORMATION 3
2.1 General Facility Information 3
2.2 Facility Location 3
2.3 Facility Operations 3
2.4 Facility Description 4
2.5 Hazardous Waste Management Units 4
2.6 Acceptable Wastes 5
2.7 Unacceptable Wastes 5
3.0 EMERGENCY RESPONSE COORDINATORS 7
3.1 Emergency Coordinators 7
3.2 Emergency Coordinator Responsibilities 7
3.3 Emergency Spokesperson 8
4.0 IMPLEMENTATION 9
5.0 EMERGENCY ACTION PROCEDURES 11
5.1. Notifications 11
5.1.1 Internal Notifications 11
5.1.2 External Notifications 11
5.2 Identification of Hazardous Materials 13
5.3 Hazard Assessment 13
5.4 Control Procedures 15
5.4.1 Level 1 Response Procedures 15
5.4.2 Level 2 Response Procedures 16
5.4.3 Level 3 Response Procedures 17
5.5 Prevention of Recurrence of the Spread of Fires, Explosions, or Releases 17
5.6 Monitor for Leaks, Pressure Buildup, Gas Generation, or Ruptures 18
5.7 Storage, Treatment, and Disposal of Released Material 18
5.8 Incompatible Waste 19
5.9 Post-Emergency Equipment Maintenance 19

5.10 Notification of Federal, State and Local Authorities before Resuming Operations 20
6.0 SPILL AND EMERGENCY RESPONSE EQUIPMENT 22
7.0 COORDINATION REQUIREMENTS 24
8.0 EVACUATION PLAN 26
8.1 Emergency Evacuation 26
8.2 Emergency Response Affecting the Local Area 26
9.0 REQUIRED PROCEDURES FOR RECORDKEEPING AND REPORTING 28
10.0 LOCATION AND DISTRIBUTION OF CONTINGENCY PLAN 29
11.0 Amendments to the Contingency Plan 31

TABLES

1. Hazardous Waste Codes

FIGURES

1. Site Location Map
2. Facility Plan
3. Route to Hospital

APPENDIX

A. Hazardous Waste Operations Notices
B. Preparedness and Prevention Information

1.0 INTRODUCTION

1.1 Contingency Plan Regulations

This Contingency Plan for the AA Sydcol, LLC Facility has been prepared in support of the AA Sydcol RCRA Part B permit application. This CP was developed in accordance with the requirements of 40 CFR 264 Subpart D in support of the AA Sydcol RCRA Part B permit application. A list of acronyms and a definition of key terms used in this description is provided with General Information provided in Appendix A of Attachment A of the RCRA Part B permit application.

1.2 Contingency Plan Purpose

This CP describes the methods, procedures, and equipment that will be used to respond to fires, explosions, or unplanned releases of hazardous wastes or hazardous waste constituents at the Facility and to document the response efforts. The plan includes an Evacuation Plan should conditions at the facility require evacuation of all or part of the Facility.

The CP will also serve as an employee training manual and handbook for prevention of and response to emergency situations at the facility and documentation of emergency responses for regulatory compliance.

A copy of this CP (final permitted version) will be kept on file at the Facility and will be made available for inspection and will be issued to local agencies as indication in Section 10.0.

1.3 Contingency Plan Requirements

This CP identifies and describes the following requirements:

- The actions to be taken in response to fires, explosions, natural disasters, or unplanned sudden or non-sudden releases of hazardous wastes or hazardous waste constituents to the air, soil, or surface water at the Facility;
- Arrangements made with local governmental agencies (police, fire, state and local emergency response teams) and other entities (hospitals, contractors) to coordinate emergency response actions;
- Names, addresses, and phone numbers for all persons qualified to act as emergency coordinators, including a primary and alternate emergency coordinators;
- A list of emergency equipment at the facility and their location and capabilities (Section 6.0);
- An Evacuation Plan with a map of evacuation routes (Figure 2); and
- A map to the nearest hospital (Figure 3).

1.4 Amendments to the Plan

The plan will be reviewed and amended, if necessary, annually or when one or more of the following occur:

- The Facility permit is revised;

- A major change in material usage, production, or storage; or changes in facility design or construction which may materially increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes in the responses necessary in the event of an emergency;
- The plan fails in an emergency;
- A major change in the amount or changes in the types of materials received, generated, or stored at the Facility;
- A change in the facility emergency coordinators; or
- A substantial change in the emergency equipment at the facility.

If no amendment to the plan is necessary based on the annual review, it will be documented in the Record of Plan Revision. Revisions to the plan will be distributed to those individuals and groups listed in section 10.0. Each revision will bear the date of revision. The updated pages will be inserted in the proper location within the plan and the obsolete pages will be discarded. The holder of the plan is to record the receipt of each revision in the Record of Plan Revisions.

2.0 FACILITY INFORMATION

2.1 General Facility Information

Facility Name: AA Sydcol, LLC
Primary Industrial Activity: Hazardous waste management facility NAICS Code(s) – 562112, 484230
Owner/Operator: Syd-Cole Properties, LLC/AA Sydcol, LLC
Physical Location: 2264 East 13th Street. Yuma, AZ 85365
Latitude/Longitude: 32° 42' 18.20" N, 114° 35' 42.26" W
Mailing Address: 2264 East 13th Street Yuma, AZ 85365
Primary Contact Person: Charles M. Templer (928) 783-3676 **Alternate Contact Person:** Juvi Remitio (928) 210-7077

2.2 Facility Location

The Facility is a hazardous waste transfer facility located at 2264 E. 13th Street, Yuma, Arizona 85365, at Latitude 32º 42'18.20 N and Longitude 114 º 35' 42.26" W (the Site). A site location map is included as Figure 1. The Facility intends to accept hazardous waste from off-site generators and will generate hazardous waste from the process of handling off-site wastes. Many of the characteristic and listed hazardous wastes from 40 CFR 261, Subparts C and D are likely to be present in wastes handled at the Facility.

2.3 Facility Operations

The Facility will consolidate, bulk, repackage, and store a variety of hazardous and non-hazardous wastes for shipment to approved off-site reuse, treatment, and/or disposal facilities, fuel blenders or wastewater treatment plants. Wastes will typically be transported in tankers, roll-off bins and/or containers (e.g. 55-gallon drums, totes) and will be liquid, semisolid, and/or solid in nature. Generators, or customers, utilizing the Facility will include commercial waste generators, industrial waste generators, LQGs, SQGs, and VSQGs of hazardous waste. Wastes will be received from

generators or through third-party waste brokers under contract with hazardous and non-hazardous waste generators.

2.4 Facility Description

The Facility consists of a 4.75-acre fenced lot with a main building, two concrete pads, and a water tank for fire control. The main building is a metal-frame structure subdivided into separate segregation areas based on hazard classes, shipping and receiving loading docks, a warehousing area for checking in, managing and storing hazardous waste, non-conforming (quarantine) areas, a laboratory, an office, and an emergency eyewash and shower area. The two concrete pads are also used as to manage and store hazardous waste.

Types of acceptable hazardous waste could include flammable and combustible materials (such as oils, waste fuels, etc.), corrosives, contaminated soils and metal-containing filter cake, and other similar bulk or containerized materials classified as RCRA hazardous waste. A site plan of the Facility is provided in Figure 2.

2.5 Hazardous Waste Management Units

There are three designated HWMUs at the Facility; a concrete pad with shade structure adjacent to and on the west side of the main building (HWMU1), a large concrete pad northwest of the main building and north of HWMU1 (HWMU2), and a concrete pad north of the warehouse area (HWMU3). Temporary storage of hazardous wastes in transport may be present in tanks and containers on trucks in the designated SWMU. All HWMUs are designed and operated to accommodate segregated hazardous waste to meet the special requirements for ignitable, reactive, and incompatible waste. The Facility is constructed and maintained to take precautions to prevent adverse reactions of the received hazardous wastes such as:

1. Generating extreme heat or pressure, fire or explosions, or violent reactions;
2. Producing uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;
3. Producing uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; or
4. Damaging the structural integrity of the container or the Facility.

The Facility will carefully manage mixtures of hazardous wastes to prevent undesirable or uncontrolled reactions. During the waste acceptance process, the Facility will inspect incoming loads, and will review relevant data (such as profile sheets, LDRs, manifests, and laboratory results) to determine the hazard class of the waste. The Facility will manage the waste consistent with its identified hazard class for storage and/or transportation.

Hazardous wastes classified as highly toxic chemicals will not be stored on site in excess of threshold quantities specified in 40 CFR 1910.119 Appendix A. Segregation of waste codes and the acceptable waste codes for each of the HWMUs are listed in Table 1.

Once the hazard characteristics of a waste are identified the waste material is transferred to the appropriate HWMU. The HWMUs have hazard class areas for ignitable, corrosive, toxic, and reactive wastes. These areas are separated by adequate aisle space, berms, catch basins or other physical barriers that prevent a reaction caused by mixing potentially incompatible wastes.

Ignitable or reactive RCRA hazardous waste are separated and protected from sources of ignition or reaction. Smoking at the facility is limited to specially designated areas and "No Smoking" signs are conspicuously placed throughout the Facility including, but not limited to entrances. Ignitable or reactive wastes in containers are stored at least 50 feet from the property line.

2.6 Acceptable Wastes

The waste streams accepted at the Facility will generally include characteristic wastes (D wastes) and/or listed wastes (F, P, and U waste), used oil, and universal waste (such as batteries, mercury-containing equipment, mercury-containing lamps/bulbs, and certain pesticides). Listed below are some examples of the types of waste received at the Facility:

1. Liquid paint, thinners, fuels, resins;
2. Alkaline sludge;
3. Alkaline liquid;
4. Mixed organic solvents;
5. Spent activated carbon;
6. Paint sludge, adhesives, resins;
7. Filter cake sludge;
8. Mercury batteries for mercury consolidation;
9. Halogenated organic solvents;
10. Soil and absorbent with organics;
11. Inorganic solid debris;
12. Nickel cadmium batteries;
13. Lead shot and wheel weights;
14. Automobile batteries;
15. Solid and liquid pesticides;
16. Rags and debris;
17. Acids with organics;
18. Mineral/organic acid liquid; and
19. Poison and flammable aerosols.

Hazardous waste codes to be accepted at the Facility are listed in Table 1.

2.7 Unacceptable Wastes

Waste streams prohibited from acceptance at the Facility include:

1. Polychlorinated biphenyls of a type or level regulated by the Toxic Substances Control Act

(TSCA) (see 40 CFR Part 761), unless exempted, excluded or otherwise authorized pursuant to TSCA regulations (i.e. PCB waste in quantities greater than 500 gallons at concentrations greater than 50 parts per million (PPM);

2. Mixed Waste (wastes that contain both a hazardous component regulated under Subtitle C of RCRA and a radioactive component consisting of source, special nuclear, or byproduct material regulated under the Atomic Energy Act);
3. Department of Transportation (DOT) "Class 1" Explosives as defined in 49 CFR 173.50 and Forbidden Explosives as defined in 49 CFR 173.54;
4. Biohazardous Medical Waste as defined by AAC R 18-13-1401;
5. K-Listed Industrial Specific wastes;
6. F-Listed Dioxin-containing wastes;
7. Lithium-ion batteries.

3.0 EMERGENCY RESPONSE COORDINATORS

3.1 Emergency Coordinators

In the event of an emergency, at least one person from the following list of Emergency Coordinators (ECs) should be contacted immediately. The EC is to act on behalf of AA Sydcol, LLC in the initiation of procedures described in this CP and has the authority to commit the resources of AA Sydcol, LLC in addressing emergency conditions at the Facility. In the event of an emergency requiring evacuation of local areas, the EC will be available to assist local authorities in determining which areas to be evacuated.

TABLE 3.1 EMERGENCY COORDINATORS	
PRIMARY	Dan Drewek, Facility Manager
Cell Phone No.	(760) 460-1499
Office Telephone No.	(928) 783-3676
Office Address	2264 E. 13th Street, Yuma, Arizona 85365
Home Telephone No.	
Home Address	
ALTERNATE	Alexander Hayden, Operations Manager
Cell Phone No	(928) 580-5734
Office Telephone No.	(928) 783-3676
Office Address	2264 E. 13th Street, Yuma, Arizona 85365
Home Telephone No.	
Home Address	
SECONDARY ALTERNATE	Juvi Remitio
Cell Phone No	(928) 210-7077
Office Telephone No.	(928) 783-3676
Office Address	2264 E. 13th Street, Yuma, Arizona 85365
Home Telephone No.	
Home Address	

3.2 Emergency Coordinator Responsibilities

The EC's purpose during an emergency condition at the Facility is to minimize potential hazards to human health or the environment from fires, reactions, explosions, releases, or other contamination that may occur as a result of a release of hazardous waste or hazardous waste constituents to the air, water, and/or soil. During an emergency, the EC's priority is to:

- Ensure human health and safety,
- Minimize actual and potential adverse effects to the environment; and
- Minimize and/or prevent damage to private and public property.

The EC will either be on-site at the Facility or on-call at all times. If the Primary EC is not available, he/she shall designate an Alternate EC. The EC's responsibilities include coordinating all emergency response measures during both operating and non-operating hours, including weekends and holidays. The EC will have a cellular telephone to communicate with on-site personnel while traveling to the facility in an emergency.

The EC will be thoroughly familiar with all aspects of the CP, all operations and activities conducted at the Facility, the location and characteristics of hazardous waste handled at the Facility, and the location of all records at the facility.

The EC is responsible for implementing this CP when there is an imminent or actual fire, explosion, or release at the Facility which could threaten human health or the environment. These responsibilities include:

- Direct Facility personnel during and following an emergency;
- Request assistance from off-site emergency response teams and/or hire commercial contractors to assist with an emergency;
- Purchase equipment or services required for an emergency condition; and
- Direct Facility operations and activities during an emergency condition.

During an emergency event, the EC should make the following initial internal notifications.

TABLE 3.2
AA SYDCOL INTERNAL EMERGENCY NOTIFICATION CONTACTS

Name	Title	Office Ext.	Home No.
Chuck Templer	Owner	(928) 783-3676	(714) 273-8150

3.3 Emergency Spokesperson

Should it become necessary to have an Emergency Spokesperson for AA Sydcol facility, the EC will notify the appropriate AA Sydcol personnel. If an Emergency Spokesperson is necessary, that individual will be available at any given time and, as such, will be responsible to coordinate the communication with the community as necessary to implement this CP.

4.0 IMPLEMENTATION

The CP will be implemented whenever there is emergency situation consisting of an imminent or actual incident involving fire, explosion, or unplanned release of hazardous waste or hazardous waste constituents that threatens the security of the Facility or the safety of its personnel, or which may threaten human health or the environment outside the Facility. The CP must be implemented whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Such conditions are considered emergencies for the purposes of this CP. An employee identifying a situation that they believe poses an emergency condition will immediately notify the EC noted in this plan. If the EC is not available, the employee will notify the first available Alternate EC. In the event of an emergency, any employee can activate the nearest internal alarm if available and immediately report the incident to 911 if warranted.

The EC or closest supervisor will immediately evacuate personnel from the affected area of the Facility according to the Facility Evacuation Plan.

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5.0 EMERGENCY ACTION PROCEDURES

In the event of an emergency, the EC will immediately assess the situation. If it is determined that an actual or imminent emergency exists, the CP will be implemented.

5.1. Notifications

The initial notification to on-site personnel will be by an alarm system. The alarm system monitors for fire and security. System panels are located at strategic locations so that the EC can identify where and what triggered the alarm. The alarm system is electrically operated and is equipped with a battery back-up to ensure operation during power outage.

Manual alarm devices (pull stations) are located adjacent to each Facility exit and at entry and exit doors. The alarms will sound an audible warning signal to employees inside and outside the buildings. There are additional alarms located in strategic areas around the site. All employees are trained in the activation process for the manual alarms.

The alarm system is monitored by an outside third party. The third party will contact the EC or designated Emergency Contact in the event of an emergency for further direction. The EC will contact local authorities for emergencies warranting an authority response. The EC will have a specific password setup with the third-party monitoring company to provide verification that the appropriate person (or procedure) is responding to the event.

5.1.1 Internal Notifications

Internal phone and radio systems allow communication throughout the Facility for use in notifying employees of an emergency. This will be used in conjunction with the alarm system. Because of the relatively small size of the Facility, voice is "capable of providing immediate emergency instruction (voice or signal) to facility personnel" as required at 40 CFR §264.32(a). The Facility also has a land-line telephone for use in contacting local and state agencies of emergency conditions if necessary. Emergency phone numbers are posted near the telephone at the exits of the Facility building.

5.1.2 External Notifications

Arrangements have been made with outside entities to provide assistance in response efforts should an emergency be beyond the capabilities of on-site resources.

The facility is located within the jurisdiction of Yuma County, which will provide municipal services for the Facility and its vicinity. The applicable local authority for emergency response at the Facility is the Yuma County Rural Metro. The Rural Metro Fire Department would generally respond to all fire, release, explosion, medical (paramedic), or other emergency events which required that outside assistance be brought to the site. The Yuma County Sheriff will provide additional municipal services, such as traffic and pedestrian control that may be required during an emergency event.

No arrangements with other emergency response entities (such as State emergency response teams, emergency response contractors, or equipment suppliers) due to the size of the Facility and the nature of hazardous waste management activities conducted at the Facility. Such arrangements are not

deemed necessary in addition to on-site and Rural Metro Fire Department capabilities. However, that does not preclude the utilization of a private emergency response contractor, if judged to be necessary and appropriate for quick response and ability to effectively handle many different situations.

The current emergency medical contractor for the facility is the Yuma Regional Medical Center at 2400 South Avenue A. AA Sydcol has contacted and familiarized the Yuma Regional Medical Center with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases on site. A map showing the location of the Yuma Regional Medical Center is provided in Figure 3. The Yuma Regional Medical Center's roles will be to provide medical response for the types of injuries or illnesses which could result from fires, explosions, or sudden or non-sudden releases on the Facility. If the emergency medical contractor is changed in the future, the new contractor will also be familiarized with the waste properties and possible injuries or illnesses

Emergency notifications that may be required are shown the in following table.

Table 5.1
EMERGENCY TELEPHONE NUMBERS

Type of Emergency	Organization		Phone
Injury / Illness	Ambulance		911
	Yuma Regional Medical Center 2400 S Avenue A Yuma, AZ 85364 10 to 15 minutes		(928) 344-2000
Fire / Explosion	Yuma County Rural Metro #9		911/(928) 349-6421
	Yuma County Sheriff		911/(928) 783-4427
	Arizona Public Safety (Highway Patrol 24-hour)		(520) 746-4500
Hazardous Material Emergency			
Spill, Release or Other Emergency	Primary Emergency Coordinator	Dan Drewek	Address: 2264 E. 13th St, Yuma Cell: 760-460-1499
	Alternate Emergency Coordinator	Alexander Hayden	Address: 2264 E. 13th St, Yuma (928) 580-5734

Any Spill or Release of a Reportable Quantity*	National Response Center	(800) 424-8802
	ADEQ	(800) 234-5677
	Yuma County Emergency Planning Committee	(928) 373-1093
	AZERC (Chris Nutter)	(602) 771-4065
	USEPA Region 9	(800) 300-2193
Other Contacts		
Environmental Response Contractor	Patriot Environmental Services 3464 Picket Street, San Diego, CA	(619) 449-9014

Note that telephone notification to ADEQ and the National Response Center 24-hour number must be provided at the earliest practical moment in the event of any release of a reportable quantity of hazardous substances that escapes containment or reaches off-site surface waters for a release of oil or petroleum product that reaches surface waters, or for a release of more than 120 gallons of petroleum products, including oils or fuels.

5.2 Identification of Hazardous Materials

The initial response to an emergency is to stop work activities in the affected area(s). This stop work order will be directed by the EC, or if the EC has not reached the area, by the on-site personnel who first observed the emergency and sounded an alarm. All personnel will have full authority to stop work activities in the event of a potential or actual emergency condition.

Following the stop work order, the EC will immediately identify hazardous waste that are or may be impacted in order to determine the type of response that will be implemented. Should the emergency condition involve releases of hazardous waste or hazardous waste constituents, the EC will identify the character, source, amount and extent of the release. The initial identification method may consist of physical (color, odor, appearance) and visual (location, source) observations to describe the material released. The EC or designee may inquire of individuals that were working in the area of the emergency when it was first reported to gain information on the waste materials that may be impacted. The EC will also consider the type of container, information provided on the manifest and profile, or other information to identify the waste involved.

The types of materials handled at the Facility lend themselves to easy physical and visual identification. In addition, waste materials are handled and stored in specific areas within the Facility to aid in identifying the general type material released. If, for some reason, the released material cannot be readily identified, the material is to be isolated and sampled for characterization purposes.

5.3 Hazard Assessment

Following identification of the hazardous waste involved in the emergency condition, the EC will

assess potential hazards to human health or the environment. The initial step in the assessment will be how to contain any fire or releases that have occurred. The assessment will consider both direct and indirect effects of the event, including the effects of any toxic, irritating, or asphyxiating gases that may be generated, and the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions. The assessment will also consider the potential for off-site impacts resulting from the emergency or from the response to the emergency.

If the EC determines that the Facility has had a release, fire, or explosion which could threaten human health or the environment outside the Facility, then the EC will proceed with the appropriate actions called for in Section 5.4 of this CP.

The assessment will include classifying emergencies as Level 1, 2, or 3 according to the general guidelines in Table 5.2 below. Level 1 emergencies are considered small releases that require response but do not pose an imminent threat to human health and the environment. Level 2 emergencies are more substantial releases that require response and pose an imminent threat to human health and the environment. Level 3 emergencies are serious hazards that require evacuation of the Facility and the support of county, state, or federal responders.

The level of classification of an emergency will be assessed at the time of identification. The classification can be changed at any time due to changes in spill parameters, personal injury, or other factors. Table 5.2 summarizes conditions for classifying emergencies.

TABLE 5.2 EMERGENCY CLASSIFICATION	
Level 1	• The quantity of released materials is below the Reportable Quantity (RQ) • The material involved is a solid material that cannot blow away from the spill site. • Emergency medical personnel are not needed • Outside response personnel are not required (i.e. fire, police, or emergency responders)
Level 2	• The quantify of release materials exceeds the RQ • The release involves an unknown material • The work area where the release occurred needs assistance • More than one work area is involved or jeopardized by the incident • Discharge to the environment and off-site areas in inevitable • Discharge is continuous • Injury is associated with the release • Two or more incompatible materials are involved • Flammable materials are involved • Discharge to a drain or sewer is a risk • PCB-contaminated materials are involved • The fire or the amount of released material is spreading

Level 3	• A large area of the Facility is impacted such that the event poses an extreme threat to human life and the environment • The type and quantity of hazardous waste involved poses a hazard for generating a toxic/corrosive vapor cloud or causing a fire or an explosion that cannot be controlled with control procedures identified in Section 5.4. • The event requires large scale evacuation of the Facility or of adjoining properties • The event requires resources of county, state, or federal agencies

5.4 Control Procedures

The control procedures described in this subsection are designed to effect safe and appropriate responses to fire, explosion, and unplanned release events which may occur as a result of activities and operations conducted at the Facility. When an emergency conditions becomes known, all facility personnel are to initiate their designated responsibilities (e.g., equipment shutdown, close containers, etc.) and evacuate the facility by going to a pre-designated area to assist the EC. Only the EC can announce "all clear" for re-entry of personnel and operations to resume.

Response tasks to be undertaken in the event of an emergency are:

1. Stop work activities in the affected area;
2. Identify the emergency condition;
3. Take immediate life-saving and/or environmental protection measures as necessary;
4. Complete internal facility notifications and evacuate facility area(s) if necessary;
5. Assess the situation and classify the emergency;
6. Complete the external notifications and evacuate neighboring area(s) if necessary;
7. Implement the appropriate control procedures as described below;
8. Implement remediation measures; and
9. Complete post-incident evaluation and reporting.

5.4.1 Level 1 Response Procedures

A Level 1 emergency will be contained, cleaned up, and mediated in accordance with this plan under the direction of the EC. Personnel will conduct the following procedures:

1. Restrict access to the area and maintain security.
2. Don appropriate personal protective equipment (PPE) (refer to profiles and SDS).
3. If a spill has occurred:
    a. Isolate release and, if possible, safely stop the release at its source.

b. Encircle the release with absorbent material.

c. Using absorbent socks or other containment materials, prevent the spill from reaching on-site and off-site storm drains, drainage channels or waterways.

d. Clean up the released materials and collect the chemical residue at the direction of the EC.

e. Ensure that all contaminated materials are transported and disposed in accordance with Department of Transportation (DOT), federal, and state regulations. Do not wash released materials into a storm drain or sewer system or place them in a dumpster.

4. If a minor fire has occurred:

   a. Extinguish fire with appropriate fire extinguishing material.

   b. The EC must confirm fire is completely out.

   c. Confirm no secondary emergencies have arisen from the fire.

   d. Clean up the impacted area and collect burned and fire extinguishing material.

   e. Appropriately dispose of contaminated material under the direction of the EC. Do not wash released materials into a storm drain or sewer system.

5.4.2 Level 2 Response Procedures

A Level 2 emergency requires a more coordinated effort by the Facility to address a release or potential release. The EC should initiate the following activities:

1. Evacuate personnel and areas, as appropriate.
2. Restrict unauthorized access to the area where the fire, explosion, or spill has occurred.
3. If a RQ has been exceeded, the EC will notify off-site organizations and follow up with a written report.
4. Under no circumstances will anyone but the EC initiate any response actions for Level 2 responses. The EC is responsible for the following measures:

   a. Assess the identity of the hazardous materials releases, the severity of the spill, the quantity released, the cause of the spill, and the source of the discharge.

   b. Establish an isolation perimeter.

   c. Implement appropriate actions to stop the release, if the discharge is continuous.

   d. Implement appropriate actions to contain the spill and prevent released materials from leaving the site.

   e. Ensure that all contaminated materials are transported and disposed in accordance with DOT, state, and federal regulations.

5. A Level 2 spill that poses a threat to human health and safety and degradation to the environment and property may require the following response procedures:
    a. Evacuate off-site area and personnel, as appropriate.
    b. Notify state and local officials.
    c. Utilize contract assistance as appropriate.
    d. Implement appropriate actions to contain the spill and prevent released materials from leaving the site.
    e. Repair or clear drainage structures.
    f. Prepare a written report.
    g. Additional monitoring and remediation.

5.4.3 Level 3 Response Procedures

The EC will implement the following for a Level 3 emergency:

1. Evacuate personnel and areas as appropriate.
2. Notify state and local officials.
3. Request additional resources or assistance from off-site agencies or organizations as necessary.
4. Evaluate the need for and extent of any site remediation necessary as a result of the release.
5. Utilize contract assistance as appropriate.
6. Repair or clear drainage structures.
7. Prepare a written report.
8. Additional monitoring and remediation.

5.5 Prevention of Recurrence of the Spread of Fires, Explosions, or Releases

Should an emergency condition occur at the Facility, all personnel are to safely and effectively contain the condition to the impacted area and minimize the potential for the emergency to grow and affect other areas and materials at the Facility. For a fire condition, personnel are to take appropriate measures necessary to prevent the spread of the fire by shutting down any pumps or processes that may be adding additional material to the fire. Ensure that response media such as water, dry chemical fire extinguisher propellant, or foam fire extinguisher propellant are compatible with burning material by checking the effectiveness of a small amount of the response media against a small portion of the fire. Apply the response media to the base of the fire. The first priority is to apply response media to that portion of the fire which may expand to neighboring waste or property. Using forklifts or other equipment, move any waste and/or property that can be safely moved out of the area or out of the actual or potential path of the fire.

If an explosion has occurred, mitigate the area by spraying an appropriate fire suppressant on the effected drum or container, releasing the pressure from a drum or tank, if it can be done safely; and using forklifts or other equipment to move waste or other materials away of the impacted area. Check the area to identify the cause of the explosion and observe nearby areas and note the presence of any flammable materials that need to be moved to prevent further explosions.

If a release has occurred, shut down pumps or processes that may be part of the release. Ensure that response media such as clay sorbent, vermiculite, foam fire extinguisher propellant, or water are compatible with released material by checking the effectiveness of a small amount of the response media against a small portion of the release. The first priority is containing the release from impacting neighboring waste or property by creating a dike of sorbent material in front of and around the released material to stop and contain the spill. If necessary, use on-site soil to dike the areas around the release. Using forklifts or other equipment, move any waste and/or property that can be safely moved out of the area or out of the actual or potential path of the release.

Good housekeeping will, and always should be practiced in order to maintain a clean and safe environment in order to prevent possible spill and safety hazards. Practices including scheduled clean-up times, maintaining well organized work areas, and proper training and education for the employees. During an emergency event, good housekeeping is essential to preventing the spread of the emergency to other areas of the facility.

5.6 Monitor for Leaks, Pressure Buildup, Gas Generation, or Ruptures

During an emergency event, the EC and designee will utilize Facility personnel to monitor other areas of the Facility to ensure no other leaks or emergency conditions are being created by pressure buildup, gas generation or rupturing. Personnel assigned to monitor other areas should be cautious to prevent exposure to potentially hazardous conditions. Should the emergency be large enough that other areas could be affected; the EC should inform local authorities of areas of concern and actions taken to prevent potential hazards from boiling liquids.

5.7 Storage, Treatment, and Disposal of Released Material

Following an emergency event, the EC will make sure that all recovered waste is stored in a proper location pending removal for off-site disposal. Materials contaminated as part of the emergency response actions, including water used to stop fires, are also to be removed from the Facility and transported to a disposal facility. Contaminated materials are to be disposed of in accordance with all applicable State and Federal regulations.

Following clean-up operations, the recovered materials will be disposed as follows:

1. Liquid products will be collected and stored in an appropriate waste management unit prior to disposal.
2. Absorbent materials and similar clean-up materials will be collected into appropriately-sized drums or containers, labeled, and stored in an appropriate waste management unit pending off-

site disposal.

3. Hazardous wastes will be collected into appropriate and compatible containers, labeled, and disposed in accordance with federal and state regulations. Absorbent and clean-up materials used in containing hazardous wastes releases are considered hazardous waste and shall be treated as such.

Upon completion of clean-up procedures, the following activities will be conducted:

1. The impacted area will be inspected by the EC or designee, and incompatible materials will be isolated from the spill scene until the affected area is entirely cleaned up.
2. Upon final clean up, the EC will verify that all emergency response equipment is clean and fit for immediate use in the event of another spill.
3. The EC will notify ADEQ that the previous two requirements have been met after a release of hazardous waste prior to resuming operations at the Facility.

5.8 Incompatible Waste

During and following an emergency event involving fire, explosion, or releases of hazardous waste, the EC will ensure that incompatible materials if present near the impacted area are moved and isolated until response actions are complete. Incompatible materials are not to be stored together in the same area.

5.9 Post-Emergency Equipment Maintenance

Following an emergency event, all affected areas will be decontaminated. The decontamination process may vary due to the nature of the hazardous waste constituents involved in the release and type of material contaminated.

All equipment utilized during an emergency event is either decontaminated following the completion of response activities or properly disposed. Decontamination procedures for various pieces of emergency equipment are as follows:

- Tools – All tools used during clean-up should be wiped clean, washed with an appropriated cleaning solution, rinsed with clean water, and allowed to air dry. The contaminated rags and cleaning solution should be discarded along with the other waste.
- Respirators – Certain parts of contaminated respirators, such as the harness assembly and leather or cloth components are difficult to decontaminate. If grossly contaminated, they may have to be discarded. Rubber components can be soaked in soap and water and scrubbed with a brush. Regulators must be maintained according to manufacturer's recommendations. Persons responsible for decontaminating respirators should be thoroughly trained in respirator maintenance.
- Sanitizing of Personnel Protective Equipment (PPE) – Reusable protective clothing and other

personal articles not only must be decontaminated before being reused, but also sanitized. The inside of hard hats, clothing, and other PPE becomes soiled by body oils and perspiration. If practical, protective clothing should be machine washed after a thorough decontamination; otherwise it must be cleaned by hand or disposed of properly.

- Sampling and monitoring equipment – All sampling and monitoring equipment should be wiped clean using an appropriate spray cleaning solution. Sampling equipment should be rinsed following washing and be allowed to air dry.

Following decontamination, all tools, sampling equipment, and other equipment used in emergency response actions shall be returned to their assigned storage area. Any equipment that is damaged shall be repaired or replaced prior to placing in storage. The EC or designee shall inventory PPE and other disposable supplied and restock as necessary.

5.10 Notification of Federal, State and Local Authorities before Resuming Operations

At the conclusion of an emergency event involving fire, explosion, or release of hazardous waste, the EC shall conduct a post-incident evaluation of the incident and response(s) along with involved Facility personnel. The intent of the evaluation is to determine methods to improve responses (such as via additional equipment and/or training). The CP will subsequently be amended, as necessary.

In addition, the EC will prepare an incident report and report the emergency event to ADEQ within 15 days of the incident. Spill and release reporting requirements are provided in Section 9.0.

If the EC determines that the Facility has had a release, fire, or explosion which could threaten human health or the environment outside the facility, they will report their findings immediately to the local fire authority, the local police, and ADEQ. If their assessment indicates that evacuation of the local off-site areas may be advisable, they will attempt to immediately notify the appropriate local authorities and will be available to help appropriate officials decide whether local areas should be evacuated. The Emergency Spokesperson will be notified to assist in the external communications.

Should the EC need to notify the National Response Center (NRC) at (800) 424-8802, the following information will be required:

1. Name and telephone number of reporter
2. Name and address of facility
3. Time, duration, and type of incident
4. Name and quantity of materials(s) involved, to the extent known
5. The extent of injuries, if any

6. The possible hazards to human health, or the environment, outside the facility

7. The names and telephone number of the person of persons to be contacted for further information.

Following completion of the response actions and before operations are resumed in the affected area(s) of the Facility, the EC or designee will notify the ADEQ and appropriate local fire and police authorities that the facility is in compliance with paragraph (h) of 40 CFR Section 264.56.

6.0 SPILL AND EMERGENCY RESPONSE EQUIPMENT

The Facility maintains various types of emergency equipment including equipment for spill control, small amounts of emergency medical supplies, and personal protection equipment (PPE). The Facility is equipped with the following emergency equipment:

1. Portable fire extinguishers. At least one ABC Dry Chemical Type, minimum 10-pound capacity, fire extinguishers will be maintained within each HWMU, with 3 class ABC fire extinguishers in the warehouse building. Additional portable class ABC fire extinguishers have been placed at the front desk in the office area, the hallway, and in the laboratory. Each is marked by red panels painted on the wall, column, post or other fixture where the fire extinguisher is located. Extinguishers are checked on a monthly basis, with annual testing and maintenance performed by an outside contractor. The records are maintained in the Facility office by the EC or designee.
2. Fire suppression water. The Facility is designed with a 121,000-gallon water tank for exclusive use in fire suppression. A six-inch pressurized water line runs from the water tank to the northwest corner of the warehouse building, which services an internal sprinkler system for the warehouse building. Fire line connections are provided on the six-inch line to service HWMU1 and HWMU2 with fire suppression water. The fire suppression system is tested quarterly by the EC and annually by an outside contractor. Fire suppression system testing records are maintained by the EC in the Facility office.
3. Spill response material. Spill kits are maintained and located at multiple locations throughout the Facility including but not limited to (1) the loading dock, 2) in the staging area (specially equipped for the material stored in these areas), and 3) the quarantine area. The equipment is inventoried and maintained by the EC or designee.
4. Alarm system which notifies a third-party service for summoning immediate emergency assistance.

Oil and chemical spill containment and control equipment is located in the warehouse area and in various areas throughout the Facility. The containment and control equipment including booms and absorbent clay are also located in various locations throughout the Facility. Additional equipment is located in the warehouse building and HWMU2 areas. In the unlikely event that heavy equipment is needed to contain or control a spill or release, the facility has plenty of soil from unpaved areas on the Facility available for containment of needed. Available spill response equipment is as follows:

TABLE 6.1
LIST OF EMERGENCY EQUIPMENT

Item/Description	Capability	Storage Area
Rubber Gloves	Hand Protection	Warehouse area
Gauntlets	Hand & Forearm Protection	Warehouse area

TABLE 6.1 LIST OF EMERGENCY EQUIPMENT		
Item/Description	**Capability**	**Storage Area**
Ear Plugs	Hearing Protection	Administrative Offices
Safety Glasses & Shields	Eye Protection	Administrative Offices
Hard Hats	Head Protection	Administrative Offices
Respirators	Respiratory Protection	Administrative Offices
Disposable Tyveks (coveralls)	Skin Protection	Administrative Offices
Fireproof Safety Clothing	Skin Protection	Administrative Offices
Safety Shoes	Foot Protection	Administrative Offices
Fire Extinguishers (class A/B/C)	Fire Protection	Warehouse (x3), HWMU2, HWMU3, laboratory, front desk, office hallway (see Figure 2)
Fire Extinguisher (class D)	Fire suppression	NOS for storing LION batteries
Stretchers	Disable Person Transport	Warehouse area
Medical Supplies	Injured Personnel	Administrative Offices
Shovels, square tipped	Contaminated Material Movement	Warehouse area
Absorbent Brooms (10’ x 8”)	Floating Contaminant Absorption	Warehouse area
Absorbent Pillows (18” x 8”)	Floating Contaminant Absorption	Warehouse area
Absorbent Pads (3/8” x 17” x 19”)	Floating Contaminant Absorption	Warehouse area
Absorbent Rolls (144’ x 38”)	Floating Contaminant Absorption	Warehouse area
Sweep brooms and dust pans	Sweep up of spilled solids	Warehouse area
Oil-Dry Absorbent	Contaminant absorption	HWMU1, HWMU2, HWMU3
Two-Way Radio Base Station	Communication	Administrative Offices
Two-Way Radios	Communication	Several locations
Telephone System	Communication	Administrative Offices
LIST OF DECONTAMINATION EQUIPMENT		
Item/Description	**Capability**	**Storage Area**
Eye wash station	Flushing eyes, face/head wash	Warehouse, office area (bathroom)
Shower	Full-body decontamination	Office area (bathroom)

7.0 COORDINATION REQUIREMENTS

Arrangements have been made with the various local authorities that may be called upon to assist in an emergency. These local authorities and their responsibilities are provided Section 10.0. Notification of hazardous waste operations has been provided by letter to local authorities as documented in Appendix A.

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8.0 EVACUATION PLAN

8.1 Emergency Evacuation

In the event a fire, explosion, or release of hazardous waste was to occur at the Facility such that evacuation of the Facility is required, the EC will use the telephone and two-way radio systems to notify Facility personnel to evacuate. The EC will indicate which evacuation route(s) to use. Possible evacuation routes are shown on Figure 2.

In an emergency, the EC will notify the appropriate state or local agencies with response roles if their help is needed and will immediately identify the character, source, amount and extent of released materials.

The following tasks are to be conducted during an evacuation. Prompt, orderly evacuation is critical in preventing unnecessary injuries. The following should be implemented:

1) Cut power to equipment.
2) Leave promptly (do not go to retrieve your lunch box, jacket, or other items)
3) Follow the evacuation route out of the Facility (as shown on Figure 2)
4) Once out of the building, **immediately** go to the rally point(s) designated on Figure 2.
5) Find your supervisor at the rally point area and report in.
6) Supervisors are responsible for determining if their employees are in the rally point area.
7) Any employees missing should be immediately reported to the EC, safety manager, medical personnel, firemen, etc. These individuals will decide on the best way to attempt a rescue.
8) **Do not** return to the Facility until the all clear has been given by the EC or designee.

8.2 Emergency Response Affecting the Local Area

If the EC determines that the Facility has fire, explosion, and/or release condition that could threaten human health or the environment outside the Facility, they will notify the appropriate state or local agencies with response roles if their help is needed and will immediately identify the character, source, amount and extent of released materials. The EC will remain at a rally point and be available to local authorities to provide information on materials and processes conducted at the Facility.

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9.0 REQUIRED PROCEDURES FOR RECORDKEEPING AND REPORTING

Sydcol will maintain a Facility Report that identifies the types and quantities of solid and hazardous wastes at the Facility, their location, locations where employees are operating, general Facility layout, and the entrances and roads in the facility for possible evacuation. Sydcol shall weekly review the contents of the Facility Report and update the report, as necessary. The Facility Report will be maintained in the administrative office area as shown on Figure 2 and be made readily available to emergency response personnel.

For emergency response actions, the EC will submit a written report to ADEQ within 15 days after an emergency event causing implementation of this CP. The report will include the following:

- Name, address, and telephone number of the owner or operator of the Facility;
- Name, address, and telephone number of the Facility;
- Date, time, and type of incident (e.g., fire, explosion); Name and quantity of material(s) involved;
- Extent of injuries, if any;
- An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- Estimated quantity and disposition of recovered material that resulted from the incident.
- A copy of the incident report will be retained on site in the facility operating record.

10.0LOCATION AND DISTRIBUTION OF CONTINGENCY PLAN

The primary copy of this CP will be maintained by the EC and kept in the office at the Facility. The EC will update the CP as required.

The following agencies/entities have been notified of the activities to be conducted at the Facility concerning the presence of hazardous waste and hazardous wastes constituents and offered to make arrangements to familiarize the agencies with the Facility layout and operations. Each of the agencies/entities listed below are to be provided a copy of this CP and any amended versions of the CP. The EC will provide updates to the CP when as they are made.

- **State of Arizona**
  ARJZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
  1110 West Washington Street
  Phoenix, AZ 85007
  Phone No. 602-771-2300

  Response: Reportable spills and releases

- **Yuma County Rural Metro**
  2029 S Arizona Avenue
  Yuma, AZ 85364
  Phone No. 520-297-3600

  Response: Fires, releases, explosions, medical emergencies

- **Yuma County Sheriff's Office**
  141 S. 3rd Avenue
  Yuma, AZ 85364
  Phone No. 928-783-4427

  Response: Traffic/pedestrian control

- **Yuma Regional Medical Center**
  Emergency Department
  2400 South Avenue A
  Yuma, AZ 85364
  Phone No. 911 or 928-344-2000

  Response: Emergency medical care

A summary statement of preparedness and prevention information (PPI) is provided in Appendix B. A copy of the PPI has been provided to the Yuma County Emergency Planning Committee, care of Yuma County Office of Emergency Management, 2200 W. 28th Street, Yuma, Arizona 85364.

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11.0 AMENDMENTS TO THE CONTINGENCY PLAN

This CP will be reviewed, and immediately amended, if necessary, whenever:

(a) The Facility permit is revised;

(b) The CP is implemented in an emergency;

(c) The Facility changes 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;

(d) The list of emergency coordinators changes; or

(e) The list of emergency equipment changes.

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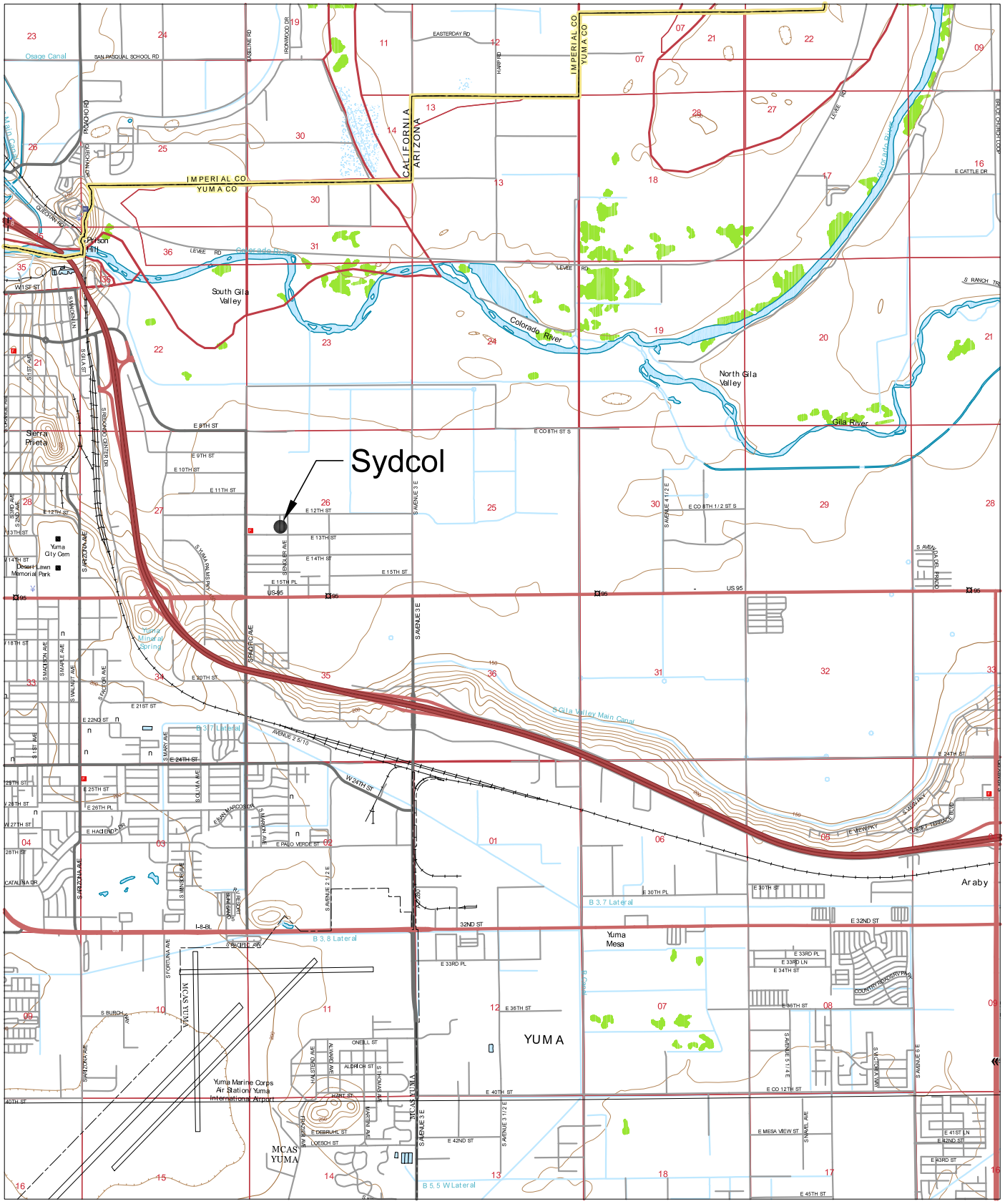
TABLES

Table 1
AA Sydcol Hazardous Wastes

Waste type	RCRA Waste Codes	HMWUs	Estimated Annual Quantity (tons)
Ignitables	D001	1, 2, 3	30,000
Corrosives	D002	1, 2, 3	20,000
Reactives	D003	1, 2, 3	200
Toxicity: Heavy metals	D004-011	1, 2, 3	100
Toxicity: pesticides/herbicides	D012-017, 020, 031	1, 2, 3	100
Toxicity: Volatile organics	D018-019, 021-022, 028-029, 035, 039-040, 043	1, 2, 3	32,500
Toxicity: Semi-volatile organics	D022-027, 032-034, 036-038, 041-042,	1, 2, 3	200
2,4-dinitrotoluene, nitrobenzene	D030, D036	1, 2, 3	2
Halogenated compounds: degreasing	F001	1, 2, 3	4,000
Halogenated compounds: solvents	F002	1, 2, 3	4,000
non-Halogenated compounds solvents	F003-005	1, 2, 3	8,000
Listed electroplating wastes	F006-009	1, 2, 3	11,000
Listed metal finishing wastes	F010-012, 019	1, 2, 3	2,500
Chlorinated aliphatic hydrocarbons	F024-026	1, 2, 3	10
Listed wood-preserving wastes	F032, F034-035	1, 2, 3	10
Refinery WW treatment sludges	F037-038	1, 2, 3	10
Hazardous leachates	F039	1, 2, 3	10
P-listed commercial chemicals	P001-P205	1, 2, 3	100
Commercial grade acetone	U002	1, 2, 3	100
Commercial grade benzene	U019	1, 2, 3	100
Commercial grade 1-butanol	U031	1, 2, 3	20
Commercial grade methanol	U154	1, 2, 3	100
Commercial grade methyl-ethyl ketone	U159	1, 2, 3	100
other U-listed commercial chemicals	U001, 003-018, 020-030, 032-153, 154-158, 160-411	1, 2, 3	200
Total			113,362

FIGURES


Sydcol
IMPERIAL CO
YUMA CO
CALIFORNIA
ARIZONA
Colorado River
Gila River
South Gila Valley
North Gila Valley
Sierra Prieta
Yuma City Cem
Desert Lawn Memorial Park
Yuma Mineral Spring
S Gila Valley Main Canal
B 3.7 Lateral
B 3.8 Lateral
B 5.5 W Lateral
Yuma Mesa
YUMA
Araby
Yuma Marine Corps Air Station/Yuma International Airport
MCAS YUMA
US 95
I-8-BL
E 8TH ST
E 9TH ST
E 10TH ST
E 11TH ST
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E 24TH ST
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E 40TH ST
E 42ND ST
E 45TH ST
E CO 8TH ST S
E CO 8TH 1/2 ST S
E CO 12TH ST
S AVENUE 3 E
S AVENUE 2 1/2 E
S AVENUE 3 1/2 E
S AVENUE 5 1/2 E
S AVENUE 1 E
S ARIZONA AVE
S MAIN ST
S GILA ST
S FORTUNA AVE
S MARY AVE
S COLMA AVE
S MCKEEN AVE
S MAPLE AVE
S WALNUT AVE
S PACIFIC AVE
S SENDER AVE
S MCLEAN AVE
S MCCAS YUMA
S MCTOWNSEND AVE
S MCTOWNSEND PL
S MCTOWNSEND LN
S MCTOWNSEND WAY
S MCTOWNSEND CT
S MCTOWNSEND TER
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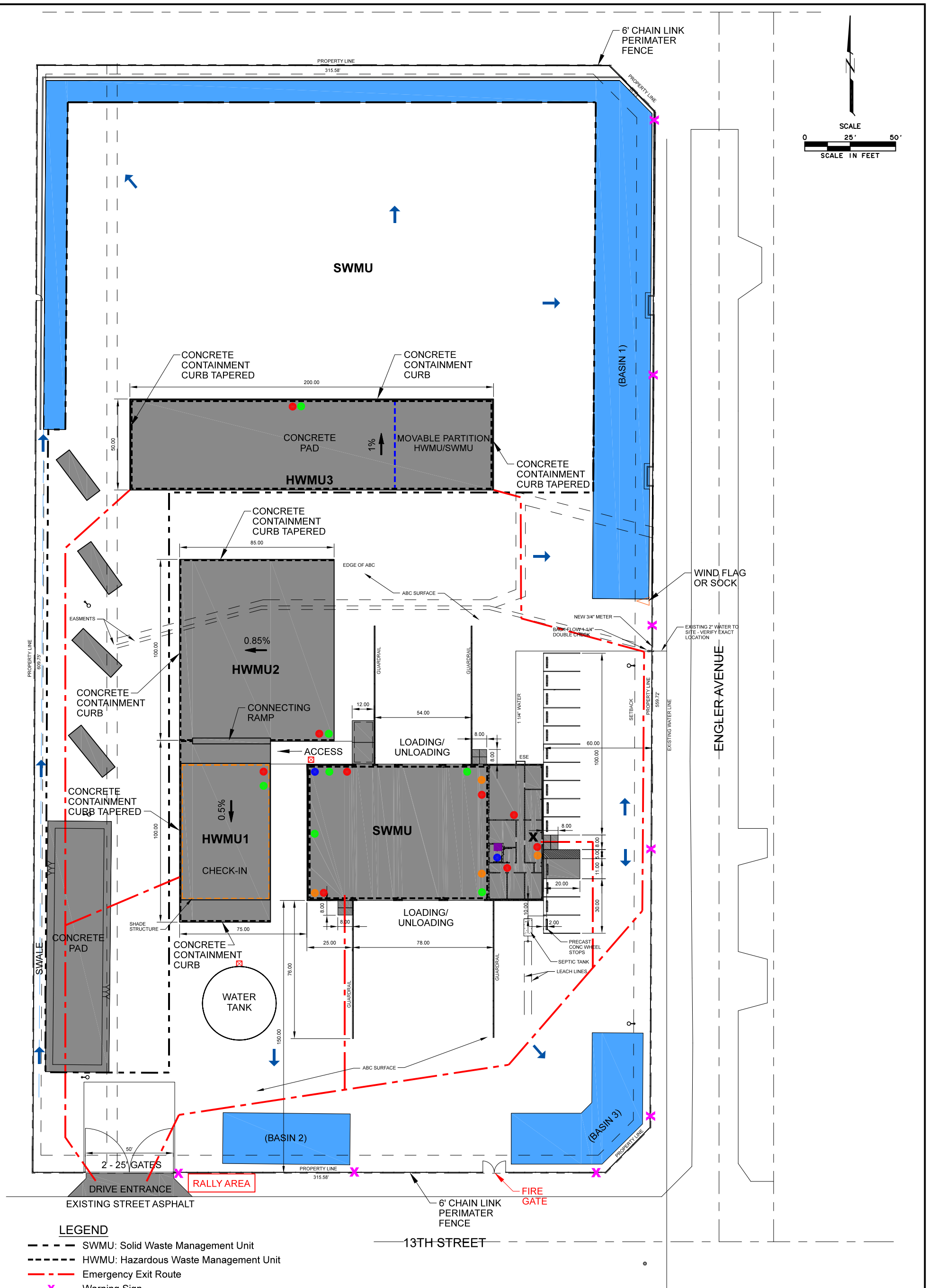
S MCTOWNSEND BLVD



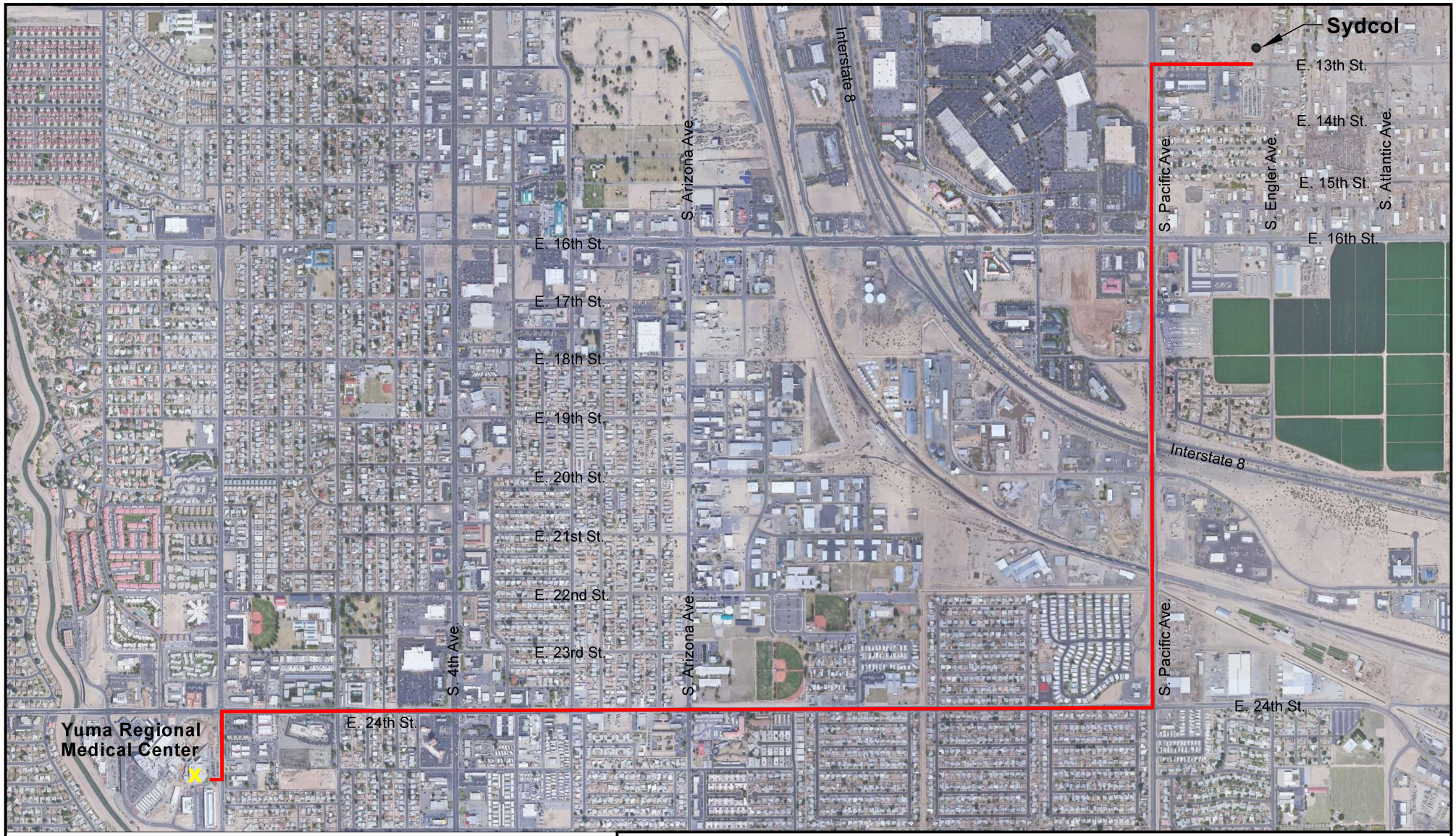
LEGEND

- SWMU: Solid Waste Management Unit
- HWMU: Hazardous Waste Management Unit
- Emergency Exit Route
- Warning Sign
- Spill Kit
- Fire Alarm
- Fire Extinguisher (ABC)
- Eyewash
- Shower
- Facility Report
- Fire Hose Connection
- Concrete Surface
- Drainage Direction
- Drainage Basin

Figure 2
SITE PLAN
Sydcol
2264 E. 13th St.,Yuma, AZ 85365

CLIENT:	APPROVED BY: JGP
PROJECT:	PROJECT NO:
DESIGNED BY: JGP	DATE: 11/5/21
DRAWN BY: TML	DWG/FILE: SYDCOL02
REVISION:	

JGP Consulting, PLC
Environmental Compliance Services



N

SCALE

0 800' 1,600'

SCALE IN FEET

LEGEND

X Hospital

Route to Hospital

Figure 3

Route to Hospital

Sydcol

2264 E. 13th St., Yuma, AZ 85365

CLIENT:	APPROVED BY: JGP
PROJECT:	PROJECT NO:
DESIGNED BY: JGP	DATE: 4/7/20
DRAWN BY: TML	DWG/FILE: JGP-SYDCOL11
REVISION:	

JGP Consulting, PLC

Environmental Compliance Services

APPENDIX A

HAZARDOUS WASTE OPERATIONS NOTICES

AA Sydcol, LLC
Site: 2264 E. 13th Street, Yuma, Az 85365 • Mailing: 3155 Golden Willow Ct., Yorba Linda, Ca 92886
Phone: 928-783-3676 • Fax: 928-783-1766
www.sydcol.com

November 12, 2019

Yuma County Sheriff Department
141 S. 3rd Avenue
Yuma, AZ 85364

Subject: Hazardous waste facility operations

To Whom it May Concern:

AA Sydcol, LLC is in the process of preparing a permit application to operate a hazardous waste facility located at 2264 E. 13th Street on heavy industrial-zoned property in unincorporated Yuma County, Arizona. The operation will be managed consistent with Federal and State regulations for hazardous waste facilities and subject to permit requirements issued by the Arizona Department of Environmental Quality. It is estimated that the facility will handle 2,300 tons of hazardous waste each month, primarily wastes that are hazardous due to toxic characteristics but also corrosive, flammable, and reactive hazardous wastes. Operations at the facility will include receipt of containers of hazardous waste and consolidation of hazardous wastes for transport off-site for disposal at approved hazardous waste disposal facilities. We will not be receiving or managing radioactive wastes, biohazardous medical wastes, Class 1 explosives, and industry-specific hazardous wastes.

Attached is a site location map and site plan that illustrate the location where hazardous waste management operations will occur. We would like to make arrangements to meet with your representatives and review the layout of the facility, the properties of hazardous waste handled and the associated hazards, places where facility personnel will normally be working, access for entrance to and within the facility, and possible evacuation routes. We would also like to discuss any agreements that are necessary for emergency services from your organization.

Please contact me at your earliest convenience to make arrangements to review our operations with your staff.

Sincerely,

Charles M. Templer
Managing Member

AA Sydcol, LLC
Site: 2264 E. 13th Street, Yuma, Az 85365 • Mailing: 3155 Golden Willow Ct., Yorba Linda, Ca 92886
Phone: 928-783-3676 • Fax: 928-783-1766
www.sydcol.com

November 12, 2019

Rural Metro Fire Department
2029 S. Arizona Avenue
Yuma, AZ 85364

Subject: Hazardous waste facility operations

To Whom it May Concern:

AA Sydcol, LLC is in the process of preparing a permit application to operate a hazardous waste facility located at 2264 E. 13th Street on heavy industrial-zoned property in unincorporated Yuma County, Arizona. The operation will be managed consistent with Federal and State regulations for hazardous waste facilities and subject to permit requirements issued by the Arizona Department of Environmental Quality. It is estimated that the facility will handle 2,300 tons of hazardous waste each month, primarily wastes that are hazardous due to toxic characteristics but also corrosive, flammable, and reactive hazardous wastes. Operations at the facility will include receipt of containers of hazardous waste and consolidation of hazardous wastes for transport off-site for disposal at approved hazardous waste disposal facilities. We will not be receiving or managing radioactive wastes, biohazardous medical wastes, Class 1 explosives, and industry-specific hazardous wastes.

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Please contact me at your earliest convenience to make arrangements to review our operations with your staff.

Sincerely,

Charles M. Templer
Managing Member

AA Sydcol, LLC
Site: 2264 E. 13th Street, Yuma, Az 85365 • Mailing: 3155 Golden Willow Ct., Yorba Linda, Ca 92886
Phone: 928-783-3676 • Fax: 928-783-1766
www.sydcol.com

November 12, 2019

Yuma Regional Medical
2400 S. Avenue A
Yuma, AZ 85364

Subject: Hazardous waste facility operations

To Whom it May Concern:

AA Sydcol, LLC is in the process of preparing a permit application to operate a hazardous waste facility located at 2264 E. 13th Street on heavy industrial-zoned property in unincorporated Yuma County, Arizona. The operation will be managed consistent with Federal and State regulations for hazardous waste facilities and subject to permit requirements issued by the Arizona Department of Environmental Quality. It is estimated that the facility will handle 2,300 tons of hazardous waste each month, primarily wastes that are hazardous due to toxic characteristics but also corrosive, flammable, and reactive hazardous wastes. Operations at the facility will include receipt of containers of hazardous waste and consolidation of hazardous wastes for transport off-site for disposal at approved hazardous waste disposal facilities. We will not be receiving or managing radioactive wastes, biohazardous medical wastes, Class 1 explosives, and industry-specific hazardous wastes.

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Please contact me at your earliest convenience to make arrangements to review our operations with your staff.

Sincerely,

Charles M. Templer
Managing Member

APPENDIX B

PREPAREDNESS AND PREVENTION INFORMATION

AA Sydcol, LLC
Preparedness and Prevention Information

1.) **Facility Name**: AA Sydcol, LLC

2.) **Facility Description:** A solid and hazardous waste storage facility that receives a variety of hazardous and non-hazardous wastes from commercial waste generators and industrial waste generators. The wastes are profiled, classified, stored, consolidated and/or repackaged and shipped to approved off-site facilities for reuse, treatment, and/or disposal.

3.) **Solid Waste Management Units:** One. On North and west ends of the Facility.

4.) **Hazardous Waste Management Units:** Four.

HWMU1: A 5,000 square-foot concrete slab located outside on the west side of the warehouse. Stores hazardous wastes in drums and totes in separated rows. Estimated capacity: 600 drum equivalents.

HWMU2: An 8,500 square-foot concrete slab located outside on the north side of HWMU2, northwest of the warehouse. Stores hazardous wastes in drums and totes in separated rows. Estimated capacity: 980 drum equivalents.

HWMU3: A 10,000 square-foot concrete slab located outside to the north of the warehouse. Stores hazardous wastes in drums and totes in separated rows. Estimated capacity: 1,100 drum equivalents.

Total Facility Capacity: 756 drum-equivalents.

5.) **Current Inventory:** See Facility Report.

6.) **Internal Communications:**

Internal phone system.

Internal alarm system with pull stations at each entrance/exit. Alarm provides audible signal and notifies the Emergency Coordinator of the location where the alarm is activated. Alarm is monitored by 3rd-party service for notice to the Emergency Coordinator.

Primary Emergency Response Coordinator: Dan Drewek, (760) 460-1499

Alternate Emergency Response Coordinators: Alexander Hayden (928) 580-5734,
Juvi Remitio (928) 210-7077

7.) **External Communications:**

Emergency Response: Yuma County Rural Metro; (520) 297-3600

Police/Traffic Control: Yuma County Sheriff; (928) 783-4427

Medical emergency room: Yuma Regional Medical Center; 911 or (928) 344-2000

Fire Fighting Equipment: Fire extinguishers (ABC) in all HWMUs and office areas. Class D extinguisher in HWMU2.

8.)Emergency Water Supply:

A 121,000-gallon tank providing pressurized water to six-inch fire line with hose connection on northwest corner of warehouse.