

7.0 CONTINGENCY PLAN

40 CFR 270.14(b)(7)/22 CCR 66270.14(b)(7)

A contingency plan is required to minimize hazards to human health and the environment from any unplanned sudden or non-sudden release of hazardous materials to the air, soil, or surface waters. Whenever a situation occurs or is imminent that might result in a release to the environment, an Emergency Coordinator will be contacted by plant personnel, and the Contingency Plan will be implemented along with the posted Evacuation Plan.

The procedures which the Emergency Coordinator will follow to implement the Contingency Plan are described in Section 7.3.4. The Emergency Procedures Checklist that the Emergency Coordinator will complete during and after an emergency is provided in Appendix 11.

Potential emergencies which might arise at the Facility are limited, with a low possibility for employee accidents. The potential for fire or explosion at the Facility is minimal. This Contingency Plan addresses various types of emergencies and specific actions which are to be taken by plant personnel in the event of occurrence.

7.1 Emergency Coordinator

40 CFR 270.14(b)(7), 264.52(d), 264.55/22 CCR 66270.14(b)(7), 66264.52(d), 66264.55

In an emergency, the Emergency Coordinator will assess possible hazards, both direct and indirect, to human health and the environment to assure proper response coordination.

Coordinators are trained at the supervisory level and all shifts have designated personnel. Coordinators have the authority to commit funds and resources to properly handle the emergency. Emergency Coordinators are thoroughly familiar with all aspects of this plan; all operations and activities of the plan; the location and

characteristic of materials handled; the location of all hazardous materials; and the layout of the plant.

The primary Emergency Coordinators for the Facility are listed in Table 7-1 with contact information. The Facility phone system is programmed to automatically forward any phone calls to the homes of Mr. John Putman and Mr. Mike Hukill during non-business hour emergencies.

TABLE 7-1 PRIMARY EMERGENCY COORDINATOR INFORMATION	
Name	Business Phone
John Putman General Manager	(661) 392-0500
Mike Hukill	(661) 392-0500
Roy Baggett Environment Affairs Coordinator	(800) 633-8744

7.2 Implementation of the Contingency Plan

**40 CFR 270.14(b)(7), 264.52(a), 264.56(d)/22 CCR 66270.14(b)(7),
66264.52(a), 66264.56(d)**

The decision to implement the Contingency Plan depends upon whether or not an imminent or actual incident or release threatens human health or the environment. The following guidance will be followed by the designated Coordinators in the event of an emergency.

The contingency actions will be implemented when:

1. Injury to an employee occurs (when the injury is beyond first aid attention, the Emergency Coordinator will call Dr. Williard Christenson or the employee will be sent directly to Memorial Hospital)
2. A spill occurs that has the potential to enter the offsite run-off area
3. Fire or explosion occurs

7.3 Emergency Response Procedures

40 CFR 270.14(b)(7), 264.56/22 CCR 66270.14(b)(7), 66264.56

7.3.1 Notification

40 CFR 270.14(b)(7), 264.56(a)/22 CCR 66270.14(b)(7), 66264.56(a)

In the event of an emergency situation, the Emergency Coordinator will be notified first. Upon arrival, the Emergency Coordinator will evaluate the situation to determine the need for implementation of the Contingency Plan. If the Contingency Plan is to be implemented, all employees will be notified that the Contingency Plan is being implemented and to proceed with evacuation of the premises according to the Contingency Plan. Subsequently, all appropriate plant personnel, appropriate federal, state, or local agencies, and appropriate emergency response services will be notified. All employees who are not assisting with implementation of the Contingency Plan will evacuate the Facility and wait outside the Facility entrance until they are notified that it is safe to re-enter the plant and continue working. The Emergency Coordinator will notify all employees when the emergency has been controlled and work can continue.

7.3.2 Identification of Hazardous Wastes

40 CFR 270.14(b)(7), 264.56(b)/22 CCR 66270.14(b)(7), 66264.56(b)

In the event that an emergency situation occurs in a hazardous waste area of the Facility, the Emergency Coordinator will immediately identify the nature, source, amount, and area of the release. Initially, the Emergency Coordinator will visually analyze the material and location of the release. The Emergency Coordinator is familiar with the location and type of waste stored at the Facility, and a visual inspection is adequate for immediate identification. Potential releases include lead-contaminated polypropylene chips, wastewater, and filter cake.

7.3.3 Assessment

40 CFR 270.14(b)(7), 264.56(c)-(d)/22 CCR 66270.14(b)(7), 66264.56(c)-(d)

The Emergency Coordinator will assess possible hazards, both direct and indirect, to human health or the environment. The Emergency Coordinator will evaluate the situation and determine, based on knowledge concerning hazards associated with the

polypropylene recycling industry, if possible health and environmental hazards exist. This could include, but is not limited to, lead-contaminated smoke inhalation or falling structures.

If the Emergency Coordinator's assessment indicates that the Facility has had a release, fire, or explosion, which could threaten human health or the environment outside the Facility, the Emergency Coordinator will report the following information:

- a. If the Emergency Coordinator's assessment indicates the evacuation of local areas may be advisable, the Emergency Coordinator will immediately notify appropriate local authorities. The Emergency Coordinator will remain available to assist the local authorities in the decision to evacuate the local area.
- b. The Emergency Coordinator will immediately notify the State Office of Emergency Services of every emergency. The report will include:
 - Name 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 materials involved, to extent known
 - Extent of injuries, if any
 - Possible hazards to human health or environment outside the Facility

7.3.4 Control Procedures

40 CFR 270.14(b)(7), 264.52(a)/22 CCR 66270.14(b)(7), 66264.52(a)

The emergency procedures that will be followed by the Emergency Coordinator to implement the Contingency Plan are detailed in this section. The Emergency Procedures Checklist that the emergency coordinator will complete during and after an emergency is provided in Appendix 11.

1. In the event of a major emergency, verbally notify all onsite plant personnel of the situation by radio, telephone, and direct communication. Evacuate personnel, if necessary. For general emergency situations verbally alert personnel in the area of the emergency.
2. Contact state and local agencies with designated response roles by telephone if assistance is required. A list of emergency telephone numbers is shown below.

Fire Department	(661) 324-4542
Police Department	(661) 327-7111
Ambulance	(661) 327-4111
Local Health Department	(661) 868-0554
State Environmental Emergency Number	(800) 852-7550
Coast Guard (National Response Center)	(800) 424-8802
DTSC	(916) 255-3574

3. Whenever there is a release, fire, or explosion, the Emergency Coordinator will immediately identify the character and source, followed by review of Facility records or manifests and, if necessary, by chemical analysis.
4. Concurrently, the Emergency Coordinator will assess possible hazards to human health or the environment outside the Facility that may result from a release, fire, or explosion. If the Emergency Coordinator's assessment indicates that the Facility has had a release, fire, or explosion that could threaten human health or the environment outside the plant, the procedures outlined in Section 7.3.3 will be initiated.
5. If a release occurs from the tank system, the Emergency Coordinator will notify the DTSC, (916) 255-3574, within 24 hours.

7.3.5 Prevention of Recurrence or Spread of Fires, Explosions, or Releases

40 CFR 270.14(b)(7), 264.56(e)-(f)/22 CCR 66270.14(b)(7), 66264.56(e)-(f)

During an emergency, the Emergency Coordinator will take all reasonable measures necessary to ensure that releases, fires, or explosions do not occur, recur, or spread to other hazardous waste material at the Facility. The Emergency Coordinator will have employees prepare all spill containment equipment, fire extinguishers, and personal protection equipment to respond according to instruction given to minimize additional emergencies. These measures will include, where applicable, stopping processes and operations, and collecting and containing released waste.

If the Facility stops operations in response to a release, fire, or explosion, the Emergency Coordinator will visually monitor for leaks, pressure build-up, gas generation, or ruptures in valves, piping, or other equipment, wherever this is appropriate. Monitoring will include checking gauges, looking for pipe leaks, and listening for pressure build-up.

7.3.6 Hostage Situations

In the event of a hostage situation, the first priority will be to protect human health. This will include both the hostages and members of the surrounding community. As soon as possible after a hostage situation begins, Facility personnel will advise the appropriate local authorities of the situation. The Contingency Plan will also be implemented to the fullest extent possible under the situation to prevent any release of hazardous waste. Should a release occur, response actions appropriate to the nature of the release will be implemented as expeditiously as possible.

7.3.7 Storage, Treatment, and Disposal of Released Materials

40 CFR 270.14(b)(7), 264.56(g)/22 CCR 66270.14(b)(7), 66264.56(g)

Immediately after an emergency, the Emergency Coordinator will arrange for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from release, fire, or explosion at the Facility. The Emergency Coordinator will use onsite mobile equipment (forklifts, tractor trailers,

and/or front-end loaders) to remove the residue. The collected material will be placed in 55-gallon drums and the drums will be labeled. The Emergency Coordinator will evaluate the material for lead content to determine disposal requirements. The surface spill location will be washed and rinsed with the clean-up water diverted to the water recovery tank (Tank 9) for subsequent treatment.

7.3.8 Post-Emergency Equipment Management

40 CFR 270.14(b)(7), 264.56(h)(2)/22 CCR 66270.14(b)(7), 66264.56(h)(2)

The Emergency Coordinator will ensure that, in the affected areas of the Facility:

- All emergency equipment used in the emergency response will be cleaned by triple rinsing the equipment to remove any residue left from its use and prepare it for its intended use before operations are resumed.
- The rinsate will be collected and disposed of properly.
- For tank systems, the tank system will either be closed in accordance with the approved Closure Plan or repaired.

7.3.9 Notification of Appropriate Authorities

40 CFR 270.14(b)(7), 264.56(i)-(j)/22 CCR 66270.14(b)(7), 66264.56(i)-(j)

The Facility will notify the DTSC and any other appropriate state and local authorities that the Facility is in compliance with Section 7.3.8 before operations are resumed in the affected areas of the Facility.

In the event of an incident (e.g., release, fire, explosion) that requires the implementation of the Contingency Plan, the Facility will note in the operating record the time, date, and details of the incident. Within 15 days of the incident, the Facility will submit a report to the DTSC which will include the following:

- Name, address, telephone number of the owner and operator and USEPA Identification Number of the Facility
- Date, time, location, and type of incident

- Name and quantity of materials involved
- The extent of injuries, if any
- An assessment of actual or potential hazards to human health or the environment, where applicable
- Estimated quantity and disposition of recovered material that resulted from the incident

7.3.10 Tank Spills and Leakage

40 CFR 270.14(b)(7), 264.196/22 CCR 66270.14(b)(7), 66264.196

In the event of a release from a tank system, the following procedures will be followed:

- The tank system will immediately be removed from service using the automatic cut-off system.
- The flow of hazardous waste into the tank system will be stopped immediately using the automatic cut-off system.
- The waste will immediately be removed from the tank system to prevent further release of hazardous waste and to allow for inspection and repair of the tank system.
- Any hazardous waste released into the secondary containment area will immediately be removed to prevent overflow from the containment system.

7.3.10.1 Notification Reports

40 CFR 270.14(b)(7), 264.196(d)/22 CCR 66270.14(b)(7), 66264.196(d)

Any release to the environment from the tank system will be reported to the DTSC within 24 hours of its detection. Within 30 days of detection of a release to the environment, the emergency coordinator will submit a written report to the DTSC containing the following information:

- Likely route of release migration
- Characteristics of the surrounding soil (soil composition, geology, hydrogeology, and climate)

- Results of any available monitoring or sampling conducted in connection with the release (If sampling or monitoring data relating to the release are not available within 30 days, the data will be submitted to the DTSC as soon as they are available.)
- Proximity to downgradient drinking water, surface water, and populated areas
- Description of response actions taken or planned

7.3.10.2 Provisions of Secondary Containment, Repair, or Closure

40 CFR 270.14(b)(7), 264.196(e)/22 CCR 66270.14(b)(7), 66264.196(e)

In the event a leak to the environment from the tank system is detected, the Emergency Coordinator will determine the cause of the leak and perform the following actions:

- If the cause of the release was a spill that has not damaged the integrity of the system, the Facility will return the tank system to service as soon as the released waste is removed and repairs, if necessary, are conducted.
- If the cause of the release was a leak from the primary tank system into the secondary containment system, the system shall be repaired prior to returning the tank system to service.
- If the Facility has to repair the tank system and the repair has been extensive (e.g., repair of a ruptured primary tank, replacement of secondary containment curb), the tank system will not be returned to service until the Facility has obtained a certification by an independent, qualified, professional engineer, registered in California, in accordance with 22 CCR 66270.11(d), that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. The certification will be submitted to the DTSC within seven days after returning the tank system to use.

7.4 Emergency Equipment

40 CFR 270.14(b)(7), 264.52(e)/22 CCR 66270.14(b)(7), 66264.52(e)

The descriptions, locations, and capabilities of the safety and emergency equipment available at the Facility are shown in Table 7-2. The equipment available includes fire

extinguishers, communication equipment, alarm systems, medical kits, personal protection, decontamination equipment, and artificial lighting.

TABLE 7-2 SAFETY AND EMERGENCY EQUIPMENT LIST		
Item Description	Locations	Capabilities
Telephones	Facility-wide	Communications for emergency notification and response coordination
Two-way Radio	Supervisors and selected personnel	Communications for emergency notification and response coordination
Fire Extinguishers	Facility-wide	General Fire Fighting (five 13-pound (lb) Halon, five 20-lb Halon, seven 20-lb CO ₂ , two 5-lb CO ₂ , one 150-lb dry chemical and nineteen 20-lb ABC)
Medical Kits	Office and Facility	First Aid
Safety Glasses, Gloves, Respirators, Particulate Filter Masks, Work Uniforms	Facility-wide (provided at office)	Personnel Protection
Emergency Showers and Eyewash Stations	Facility	Personnel Decontamination
Signs	Granulator Room, Facility-wide	Barriers for unsafe areas
Decontamination Equipment	Maintenance Room	Decontaminate equipment after an emergency
Portable Lights	Maintenance Room	Lighting device in case of power outage
Empty Drums	Maintenance Room	Store material recovered from spill/release incident
Water Hose	Facility and Maintenance Room	Decontamination
Safety Harness	Maintenance Room	Personnel Protection

7.5 Arrangements with Local Authorities

40 CFR 270.14(b)(7), 264.37, 264.52(c)/22 CFR 66270.14(b)(7), 66264.37, 66264.52(c)

Arrangements have been secured with the local fire and police departments to acquaint responders with the Facility operations and plant layout with respect to potential hazards, worker locations, entrances, and onsite roads, along with possible evacuation routes. An agreement has been made with an ambulance service to provide medical

support to the Facility. The company doctor will handle all medical emergencies and has been briefed on all hazardous wastes (and their properties) managed at the Facility. Arrangements have been made with the local hospital to acquaint their staff with the nature of possible injuries or illnesses peculiar to handling hazardous materials managed at the Facility. The emergency arrangement documentation is provided in Appendix 10.

7.6 Evacuation Plan for Facility Personnel

40 CFR 270.14(b)(7), 264.52(f)/22 CCR 66270.14(b)(7), 66264.52(f)

The general routes to be taken in an emergency requiring evacuation of the Facility are shown on the Figure 16: Evacuation Plan. The designated staging area for all KW California employees in an emergency is the KW California sign located north of the main entrance. The fuel cut-off and power cut-off responsibilities are designated in each area to supervisors and back-up personnel, in case of injuries. All employees will exit the Facility from designated emergency exits and assemble in front of the building at the KW California sign.

7.7 Recordkeeping and Reporting Procedures

40 CFR 270.14(b)(7), 264.56(j)/22 CCR 66270.14(b)(7), 66264.56(j)

As required in 40 CFR 264.56(j) (and 22 CCR 66264.56(j)), any emergency event that requires implementing the Contingency Plan will be reported in writing within 15 days to the USEPA Regional Administrator. A reporting form for emergency events is included in Appendix 11.

In addition to these reporting requirements for the State and Federal authorities, the Facility has internal reporting requirements. The following incidents require that an incident report be completed and returned to the Plant Manager within one day and made part of the operating record:

- All fires
- All liquid and oil spills

- All injuries - no matter how slight
- All equipment damage due to malfunction or operating error
- All "near misses" of the above variety that could have had serious consequences

7.8 Location and Distribution of Contingency Plan

40 CFR 270.14(b)(7), 264.53/22 CCR 66270.14(b)(7), 66264.53

A copy of the Contingency Plan and all revisions will be maintained at the Facility and submitted to all local emergency services. These services include the police department and fire department, hospital, and state and local emergency response teams with whom arrangements have been made to provide emergency services to the Facility.

8.0 PERSONNEL TRAINING

40 CFR 270.14(b)(12), 264.16/22 CCR 66270.14(b)(12), 66264.16

The information contained in this section outlines the personnel training program for the hazardous materials management program in accordance with the California Hazardous Rules.

8.1 Outline of Training Program

40 CFR 270.14(b)(12), 264.16(a)(1)/22 CCR 66270.14(b)(12), 66264.16(a)(1)

8.1.1 Training of Personnel

The Facility promotes plant safety and environmental management by educating and training employees in safety procedures in compliance with State of California requirements. All employees performing job activities related to hazardous waste management receive traditional classroom training, eight hours of on-the-job, supervised training, and annual updates. The program also includes assignment-specific training which is designed to correspond with actual tasks performed while on the job.

8.1.2 Personnel Required to Complete Program

The training program on "Hazardous Waste Handling" is directed by the Environmental Affairs Manager. The Training Director is a qualified person who has been trained in hazardous waste management procedures (a USEPA-Certified Hazardous Waste Handler) and is familiar with the Facility operations. The credentials of the current Training Director are presented as Appendix 12.

Many of the production employees may "encounter" hazardous wastes as part of their normal job responsibilities. These wastes include recyclable wastes which serve as raw materials. Since it is impractical to define those employees who may or may not occasionally encounter hazardous wastes, every production employee has been, and will be, trained in the general scope of the applicable Resource Conservation and Recovery Act (RCRA) regulations.

All new employees are required to successfully complete the training program at their initial date of employment. New employees are not allowed to work in unsupervised positions until training is completed. All personnel who are reassigned to new duties undergo retraining in their job-specific activities within six months of change of duty.

The duties and responsibilities of each position involved in the hazardous waste management process are as follows:

8.1.2.1 Chip Transportation Driver

Facility personnel assigned with chip transportation are directly responsible for the movement and direction of trailer shipments of hazardous waste polypropylene chips on the Facility property. Each chip transportation driver's daily duties include:

- Driving trucks
- Parking trailers
- Weighing trailers
- Directing trailers to unloading areas
- Minor vehicle maintenance
- Inspecting his/her work station for environmental situations

Chip transportation drivers receive the KW California Hazardous Waste Operations Training Program, DOT HAZMAT Training, as well as job-specific training. Each driver is issued protective work uniforms and personal protective equipment and is required to shower at the end of the work shift.

8.1.2.2 Receiving, Trailer Unloading Worker

The Facility personnel assigned to receiving are directly responsible for unloading hazardous waste polypropylene chips from trailers into the receiving hopper. Each worker's daily duties include:

- Unloading trailers

- Decontamination of trailers
- Waste feed operations
- Hopper and auger maintenance
- Inspecting his/her work station for environmental situations

Trailer unloading workers receive the KW California Hazardous Waste Operations Training Program, DOT HAZMAT Training, as well as job-specific training. Each worker is issued protective work uniforms and personal protective equipment and is required to shower at the end of the work shift.

8.1.2.3 Material Operations, Tank Operations Worker

The Facility personnel associated with material operations are directly responsible for process operations utilizing the float separator and the granulator systems. The tank operation workers also are responsible for the closed loop water recovery system at the water retention area. Each workers daily duties include:

- Waste feed
- Chip cleaning and granulating
- Emergency cutoff
- Decontamination of work area
- Inspecting his/her work station for environmental situations

Tank operation workers receive the KW California Hazardous Waste Operations Training Program as well as job-specific training. Each worker is issued protective work uniforms and personal protective equipment and is required to shower at the end of the work shift.

8.1.2.4 Waste Management, Hazardous Waste Bale Worker

The Facility personnel assigned to waste management are directly responsible for the storage and management of baled hazardous material obtained from the float separator system. Daily duties for these workers include:

- Operating bailer
- Cleanout of float separator system
- Decontamination of work area
- Storage and handling of waste bales
- Loading bales on trailers
- Inspecting his/her work station for environmental situations

Waste bale workers receive the KW California Hazardous Waste Operations Training Program as well as job-specific training. Each worker is issued protective work uniforms and personal protective equipment and is required to shower at the end of the work shift.

8.2 Outline of Program

8.2.1 Training Content, Frequency, and Technique

The program developed for training employees in the safe handling of hazardous wastes has been organized into a video tape titled "Hazardous Waste Handling." This visual training technique has been proven effective at the Facility. Provisions are made for annually updating or revising the text, as necessary, to ensure compliance with the terms of the RCRA permit. An outline of the training video tape is presented in Section 8.2.2. This training video tape is played as needed at the Facility and is made available for employee reviewing at any time.

During the training program, employees are instructed on:

1. The hazardous nature of metallic wastes handled at the facility
2. The purpose of RCRA and importance of maintaining compliance with RCRA regulations
3. Proper handling and storage procedure for wastes
4. Emergency procedures and Contingency Plan implementation relevant to the position in which they are employed

This video tape is used as the basis or framework for training personnel in the proper procedures, equipment, and systems to be used in managing hazardous wastes. Training equipment and frequency are described in Section 8.3.

Key personnel receive supplementary training, including attendance at one or more technical seminars or training programs on hazardous materials. The responsibilities and job description of the key personnel are described in Section 8.1.2.

8.2.2 Content of the Training

A brief description of the elements of the hazardous waste training program, both the initial and annual refresher, is provided as follows:

Part I - Introduction

- 1.1 Hazardous Wastes at KW California
- 1.2 The Resource Conservation and Recovery Act - RCRA

Part II - Facility and Process Description

- 2.1 Description of Wastes to be Managed
- 2.2 Description of Storage and Disposal Facilities
- 2.3 Normal/Routine Operations
- 2.4 Waste Analysis
- 2.5 Recordkeeping and Reporting Requirements
- 2.6 Security
- 2.7 Inspections

Part III - Emergency Procedure and Contingency Plans

- 3.1 Emergency Coordinator
- 3.2 Emergency Procedure
- 3.3 Emergency Communications/Phone Numbers and Alarms
- 3.4 Location, Maintenance, Inspections, and Use of Emergency Equipment
- 3.5 Spill Control and Response to Ground-Water Contamination Incidents

- 3.6 Power Interruption or Failure
- 3.7 Tornadoes, Hurricanes and Severe Storms

Part I - Introduction

This section introduces employees to the general classes and characteristics of hazardous wastes that can be hazardous to health and property. The term toxicity is defined. It is the company's policy that each employee handling chemical substances (raw materials, finished products, byproducts, process chemical and wastes) respect them and be aware of these potential hazards. This is emphasized in the section "General Training" given to all production employees. The company's policy on the use of protective clothing and safety equipment to prevent accidental work exposures and releases to the environment of hazardous chemicals and wastes is introduced.

The authority for regulating hazardous wastes under the Resource Conservation and Recovery Act is discussed. The regulatory framework for classifying hazardous wastes, setting operational standards and permitting procedures, and achieving compliance is explored. The RCRA permit will be explained to assure that each key employee is familiar with its terms.

Part II - Storage and Disposal of Hazardous Wastes

This section focuses on the type of hazardous wastes that are handled and stored at the company, normal/routine storage and disposal operations, and procedures for maintaining compliance with the RCRA permit (e.g. waste analysis, record keeping, inspection, and security). The dimensions, capacity, and relative position of each regulated area are described in detail.

Training for normal or routine operating conditions includes the following topics:

1. Proper operation and maintenance of the regulated units
2. Scheduled inspections
3. Purpose and use of security and communications systems

4. Monitoring requirements for tracking and recording the operation of the facility
5. Record keeping requirements and procedures

Part III - Emergency and Contingency Plans

The third section of the training program provides detailed instruction on steps to be taken in the event of an emergency such as a waste spill, power outage, or damage from wind and storms. The Emergency Coordinator is clearly identified, as well as emergency phone numbers and directions for locating and using on-site emergency equipment, alarms, and communications. The Contingency Plan is also discussed in detail.

The same training video tape is used in classroom training for both introductory training and annual review. All personnel involved with hazardous waste are required to complete four hours of classroom training in addition to on-the-job training. Also, personnel receive a two-hour classroom review training session once a year.

8.2.3 Design of Training Relative to Position

40 CFR 270.14(b)(12), 264.16(a)(2)/22 CCR 66270.14(b)(12), 66264.16(a)(2)

The training program on "Hazardous Waste Handling" is directed by the Environmental Affairs Manager, under the supervision of the upper management of KW California. The Training Director and the training staff are qualified persons who have been well trained in hazardous waste management procedures and are familiar with the Facility operations. The management staff, under the supervision of the Training Director, is also USEPA trained hazardous waste handlers.

8.2.4 Training for Emergency Response

40 CFR 270.14(b)(12), 264.16(a)(3)/22 CCR 66270.14(b)(12), 66264.16(a)(3)

This training program is designed to ensure that personnel not only handle hazardous waste in a safe manner but also properly respond to emergency situations. The program trains hazardous waste handling/management personnel to maintain compliance under normal operating conditions and emergency conditions.

Training elements addressing non-routine and emergency situations (unscheduled shutdowns and startups due to storms, power outages, spills) include:

1. Procedure for locating, using, inspecting, repairing and replacing facility emergency and monitoring equipment:

Table 7-2 Safety and Emergency Equipment List of Section 7.4 lists all available safety and emergency equipment, the location of each piece of equipment and the applicable uses of the equipment. The training video tape provides detailed instruction of the equipment use and maintenance procedures.

2. Emergency communication procedures, including alarms:

The step-by-step emergency communication reporting procedures are described in detail in Section 7.3.4 and the training video tape.

3. Response to fire or explosions:

Although the nature of the hazardous wastes handled at the Facility present a minimal fire hazard, the training program does address these issues (reference Section 7.0 and training video tape for detailed procedures). In case of fire or explosions, the Emergency Coordinator and the designated Supervisor on duty will notify all Facility personnel and call the Bakersfield Fire Department (911). If it is determined that the emergency could threaten human health, the emergency coordinator will evacuate personnel. Detailed evacuation procedures are provided in Section 7.6.

4. Response to groundwater contamination incidents and procedures for containing, controlling, and mitigating spills:

All hazardous waste operations are conducted in areas with secondary containment. Thus, it is unlikely that any spills will reach ground or surface water. Nonetheless, employees are trained in appropriate response activities as outlined in Section 7.0.

5. Shutdown of operations and power failure procedures:

Refer to Section 7.3.4. The Plant Manager and the Emergency Coordinator will supervise and direct these shutdown procedures.

6. Procedures for evacuation of nearby areas, if necessary:

Detailed evacuation plan is addressed in Section 7.6.

8.3 Implementation of Training Program

40 CFR 270.14(b)(12), 264.16(b), (d)(4), and (e)/22 CCR 66270.14(b)(12), 66264.16(b), (d)(4), and (e)

The director of the training program and all current waste handling personnel has been fully trained at the time of this submittal. In the future, all new personnel will complete this training program within six months of assignments to the hazardous waste facility or within six months of their date of employment, whichever is later. No employee hired to work at the Facility will work unsupervised prior to completion of the training program. Facility personnel are required to complete a training program within six months of their transfer to a new position at the facility. Employees are required to meet annually for review and update of this training program.

Records documenting the job titles for each position, job description, names of employees, and complete training programs (both introductory and review) will be kept onsite in the personnel office of the Facility for persons directly responsible for hazardous waste management. These records will be kept until closure of the facility for current employees and for three years from the date of the individual employee's

termination for former employees. Additionally, it will be documented on every production employee's training record that he/she has received "general training" in hazardous waste handling procedures and regulations.

8.4 Medical Surveillance Program

The Facility will provide a medical surveillance program for its employees to ensure health and fitness. The Facility will provide for medical monitoring of each employee's blood lead and zinc protoporphyrin (ZPP) levels on a regular basis. Employees whose levels exceed Federal Exposure Limits will be removed from his/her job and made knowledgeable of his/her individual medical status as related to his/her job. The medical surveillance follows the requirements of the OSHA Lead Standard as cited in 29 CFR 1910.1025. This standard requires that the Facility provide the following:

1. Pre-employment physical exam for all employees assigned for the first time to an area in which lead concentrations are at or above the action level.
2. An annual physical exam for each employee with a blood lead level at or above 40 microgram (μg)/100 gram (g) during the preceding 12 months.
3. Blood lead and ZPP test on the following schedule:
 - A. At least every six months for any employee covered under the lead standard.
 - B. At least every two months for each employee whose last blood sample and analysis indicated a blood lead level at or above 40 μg /100 g of whole blood. This frequency shall continue until two consecutive blood samples and analyses indicate a blood lead level below 40 μg /100 g of whole blood.

- C. At least monthly for an employee removed from exposure to lead due to an elevated blood lead level.

8.5 CPR/First Aid

All Facility supervisory personnel currently receive annual CPR training. A first aid training program will be implemented for supervisory personnel.

9.0 CLOSURE PLAN

40 CFR 270.14(b)(13)/22 CCR 66270.14(b)(13)

This plan identifies the necessary steps to close the hazardous waste portion of the Facility at the end of the hazardous waste units' operating lives. Closure is currently estimated to occur in the year 2050.

9.1 Closure Performance Standard

40 CFR 270.14(b)(13), 264.111/22 CCR 66270.14(b)(13), 66264.111

The following paragraphs describe the closure activities for the Facility. These plans are intended to provide for the closure of these units in a manner that:

1. Minimizes the need for further maintenance, and
2. Controls, minimizes, or eliminates, to the extent necessary to prevent threats to human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground or surface waters or to the atmosphere.

Closure will be accomplished at the Facility by the removal of wastes, along with the decontamination of the tanks, water storage ponds, bale storage area, and containment structure components as described herein. Since the incoming waste polypropylene chips are unloaded directly into the treatment/recycling system from which they exit as a non-hazardous, raw process material which is utilized onsite; the only hazardous waste to be handled during closure is that generated by the processing of the chips.

9.2 Partial/Final Closure Activities

40 CFR 270.14(b)(13), 264.112(b)(1)-(7)/22 CCR 66270.14(b)(13), 66264.112(b)(1)-(7)

There will be no partial closure of the Facility. Final closure activities will begin when Facility management decides to stop recycling the hazardous waste polypropylene chips.

9.3 Maximum Waste Inventory

40 CFR 270.14(b)(13), 264.112(b)(3)/22 CCR 66270.14(b)(13), 66264.112(b)(3)

An estimate of the maximum inventory for these units is shown in Table 9-1.

TABLE 9-1 MAXIMUM WASTE INVENTORY ¹		
Unit	Description	Quantity
Closed-loop treatment/recycling system ²	Lead-contaminated wastewater	102,353 gallons
Baled waste storage ³	Baled rejected chips and tank residues	4,000 pounds
Untreated waste polypropylene chips	Chips received but not treated and recycled prior to closure	40,000 pounds

- Notes:
- 1- Maximum waste inventories are based on "reasonable worst case" assumptions. It is likely that these quantities will approach zero immediately prior to closure.
 - 2- Include any liquids retained within the water storage ponds and secondary containment system as well as all components (tanks and ancillary piping) within the treatment system.
 - 3- Includes an allowance for tank residues removed at the time of closure as well as all debris removed from within the containment area in the Granulator Room.

9.4 Inventory Removal and Disposal

40 CFR 270.14(b)(13), 264.112(b)(4)/22 CCR 66270.14(b)(13), 66264.112(b)(4)

Under normal circumstances, there will be no inventory of untreated waste polypropylene chips at the time of closure. Prior to closing the Facility, KW California will treat and recycle any chips which are in-process. No additional chips will be accepted at the Facility.

Nonetheless, for purposes of this Closure Plan and to ensure an adequate estimate of the cost for closure, the Facility has assumed there will be up to 40,000 pounds (20 tons) of untreated hazardous waste polypropylene chips present at the time of closure (see Table 9-1). These chips will be transported to an offsite hazardous waste disposal facility for disposal at the time of closure. The disposal facility will be the same facility that receives the rejected chips generated by the Facility's operations. Since these two waste streams are essentially identical, this will ensure the disposal facility is capable of handling these wastes. At closure, all rejected material, tank residues and liquids will

be removed from the system. The solids will be baled in accordance with the existing operating procedure. The baled material will be shipped to the same approved, offsite hazardous waste disposal facility which received this material during the active life of the Facility.

Non-hazardous liquids (wastewater) will be directed to the water storage ponds for storage prior to disposal. If testing indicates these liquids are amenable for disposal at the Publicly-Owned Treatment Works, the City of Bakersfield will be contacted with a request to accept this wastewater. However, the primary method of disposal will be at an offsite, commercial, hazardous wastewater treatment facility. Residues (sludges) from the water retention area will be treated at the filter press. The resultant solids and liquids will be disposed as described above.

9.5 Decontamination

40 CFR 270.14(b)(13), 264.112(b)(4)/22 CCR 66270.14(b)(13), 66264.112(b)(4)

All areas and equipment that have been exposed to hazardous waste will be decontaminated. Once cleaned, measures will be taken to prevent re-contamination by blocking access, covering with plastic sheeting, or closing any openings (tank valves, access hatches, etc.). Areas and equipment requiring decontamination include the process tanks, water storage ponds, bale storage area, and secondary containment structures. The surfaces to be decontaminated are either non-porous (stainless or carbon steel) or porous (concrete). The type of surface will dictate the appropriate closure method as described in the following sections.

9.5.1 Decontamination Procedures

9.5.1.1 Non-Porous Surfaces

The interiors of all tanks (including stainless steel, carbon steel, and polyethylene) will be triple rinsed using a minimum 2,500-psi pressure washer. After decontamination, the tanks will either be reused for other purposes or sold for their salvage value. As such,

no cost has been included for the disposal of these tanks. Non-porous surfaces may also be steam cleaned, if necessary. Rinsate from unit decontamination will be collected within the secondary containment area and pumped into portable storage tanks. The rinsate will be tested for total lead using the same methods described in Section 4.2 to determine the appropriate disposal methods.

9.5.1.2 Porous Surfaces

Porous surfaces, including the floor and sidewalls within the secondary containment area, will be triple rinsed using a minimum 2,500-psi pressure washer.

9.5.2 Operational and Decontamination Equipment

At the closure of the Facility, equipment used in the Facility's hazardous waste operations (fork lifts, etc.) will be decontaminated by pressure washing prior to removal from the secondary containment area. This operation will take place within the secondary containment area. Wash waters will be directed to the water recovery tank (Tank 9) for treatment.

Equipment used during the decontamination process, such as, pressure washers, shovels, personal protective equipment (PPE), etc, will also need to be cleaned. In some cases it may be more cost effective for items to be destroyed. If so, these items should be disposed of in the same manner as untreated hazardous waste polypropylene chips. A decontamination pad to contain and collect contaminated rinsate will be established outside of the secondary contaminant area and is explained further in Section 9.5.3. The rinsate will be directed to portable storage tanks pending disposal based on analytical testing.

9.5.3 Decontamination Pad

A decontamination pad will be temporarily constructed for use during decontamination activities. The pad will be constructed outside of the area being decontaminated, but inside of the decontamination or "hot" zone. The decontamination pad will be used to

clean materials used during the decontamination and sampling process, such as pressure washers, sampling spoons, etc. Guidelines to be used for construction and placement of the pad are as follows:

1. The pad should be constructed in an area known or believed to be free of surface contamination.
2. The pad should not leak excessively.
3. If possible, the pad should be constructed on a level, paved surface and should facilitate the removal of rinsate. This may be accomplished by either constructing the pad with one corner lower than the rest, or by creating a sump or pit in one corner or along one side. Any sump or pit should also be lined with a water-impermeable material.
4. Sawhorses or racks constructed to hold equipment while being cleaned should be high enough above ground to prevent equipment from being splashed.
5. Water should be removed from the decontamination pad frequently.
6. A temporary pad should be lined with a water-impermeable material with no seams within the pad. This material should be either easily replaced (disposable) or repairable.

9.6 Confirmatory Sampling Procedures

All areas requiring decontamination will be sampled to ascertain the effectiveness of the decontamination process. Upon final plant closure, confirmatory sampling will be conducted. Prior to final closure, KW will submit a confirmatory sampling plan to DTSC for consideration.

9.7 Contaminated Soils/Surface Waters

40 CFR 270.14(b)(13), 264.112(b)(4)/22 CCR 66270.14(b)(13), 66264.112(b)(4)

No hazardous wastes are managed in direct contact with the land surface. Further, all waste handling areas have secondary containment. Thus, the only and unlikely way for soils or surface waters to become contaminated is from an accidental release which also escapes the secondary containment system. In the event of an accidental release, the incident will be addressed at the time of occurrence and any necessary remediation will be conducted as part of the Facility's Contingency Plan implementation. Consequently, it will not be necessary to address contaminated soils or surface waters outside of the secondary containment areas as part of the closure process.

9.7.1 Secondary Containment Soil Sampling

The soils underlying the secondary containment areas (treatment rooms and receiving hopper) will be sampled to confirm that they have not been contaminated. Soil samples will be analyzed for total lead as described in Section 4.2. To determine if the secondary containment soil has been impacted by Facility operations, the soil sample results will be compared to the USEPA, Region 9, Industrial Soil Preliminary Remediation Goal (PRG), dated October 2004, of 800 milligrams per kilogram for lead. If the soil sample results are less than the PRG for lead, the corresponding areas will be considered clean and closure completed.

In the unexpected event that a soil sample contains lead at a concentration exceeding the PRG for lead, a permit modification, including a copy of the amended closure plan for approval, will be submitted to the DTSC no later than 30 calendar days after receipt of the analytical results. The amended closure plan will include an investigation strategy to delineate the lead contamination.

9.7.2 Secondary Containment Soil Sampling Procedures

The soil samples will be collected at a frequency of one per every 500 square feet of secondary containment floor area. The soil samples will be collected from immediately beneath the overlying concrete after a 2-foot square section of concrete is cut and

removed. The resulting holes in the concrete slabs will be patched with a concrete patching material or with new concrete after the samples are collected. The location and sample identification will be marked on the finished surface of the repaired hole. The collection of the soil samples will be performed using the following procedures:

1. Facility personnel collecting the sample will don clean, disposable gloves.
2. All foreign media (concrete, gravel, etc.) should be removed from the soil sample area.
3. A hole should be dug with a stainless steel utensil to the appropriate depth (six inches) and the media should be consolidated in a stainless steel bowl. The sample should be thoroughly mixed to ensure proper consolidation.
4. Collect 4 ounces of the sample media in a labeled, laboratory-provided sample container.
5. Record the specific location of the sample area.

9.8 Schedule for Closure

40 CFR 270.14(b)(13), 264.112(b)(6)/22 CCR 66270.14(b)(13), 66264.112(b)(6)

The Facility will notify the DTSC in writing at least 45 days prior to the date on which KW California expects to begin closure of the Facility. If KW California receives written notice pursuant to 22 CCR 66264.112(d)(1) that a longer review period is required by DTSC, KW California will revise closure beginning date accordingly.

Within 90 days after receiving the final shipment of hazardous wastes, KW California will remove all hazardous waste from the Facility in accordance with this Closure Plan. In the event that removal of all hazardous waste from the Facility within the allotted 90 day period can not be completed, KW California will submit a written extension request to the DTSC at least 30 days prior to the expiration of the 90 day removal period.

All remaining closure activities shall be completed within 180 days of receiving the final shipment of hazardous waste. In the event that completion of the closure activities within the allotted 180 day period can not be performed, KW California will submit a written extension request to the DTSC at least 30 days prior to the expiration of the 180 day completion period.

9.9 Certification of Closure

40 CFR 270.14(b)(13), 264.115, 264.280/22 CCR 66270.14(b)(13), 66264.115, 66264.280(b)

Within 60 days of completion of closure, KW California will submit to the DTSC, by registered mail, a certification that the unit was closed in accordance with the specifications in the approved Closure Plan. The certification will be signed by KW California and by an independent, California-licensed, professional engineer. Documentation may be requested at any time from closure until KW California is released from the operators financial assurance requirements for closure under 22 CCR 66264.143(i).

9.10 Closure Cost Estimate

40 CFR 270.14(b)(15), 264.142/22 CCR 66270.14(b)(15), 66264.142

The closure cost estimate for the hazardous waste tank system is provided in Appendix 13. The estimated cost of implementing the Closure Plan is based on the cost for KW California to hire a third party to close the Facility.

During the active life of the Facility, KW California will update the closure cost estimate for the Facility to account for inflation within 30 days after the close of the firm's fiscal year. KW California will keep the latest closure cost estimate at the Facility and send any revisions to DTSC for filing. KW California will also revise the closure cost estimate within 30 days after the DTSC approves any modifications to the Closure Plan, as necessary.

9.11 Amendment of Closure Plan

40 CFR 270.14(b)(13), 264.112(c)/22 CCR 66270.14(b)(13), 66264.112(c)

If changes in the Facility operating plans or design affect the Closure Plan, if unexpected events encountered during closure require a modification, or if a modification is otherwise desired, KW California will submit to the DTSC a request for permit modification which shall include a revised Closure Plan containing the proposed modification. The request will be submitted at least 60 calendar days prior to any proposed changes.

9.12 Recordkeeping

One copy of the approved Closure Plan and any revisions and updates, including the annual closure cost review, will be maintained at the Facility. Since no post-closure activities (e.g., monitoring or inspections) are required, detailed recordkeeping procedures have not been established.

10.0 FINANCIAL ASSURANCE AND LIABILITY REQUIREMENTS

40 CFR 270.14(b)(15), (17), 264.143, 264.147, 264.151/22 CCR
66270.14(b)(15), (17), 66264.143, 66264.147

KW Plastics of California maintains a Letter of Credit with a supporting standby trust, in accordance with 22 CCR 66264.143(d), for the amount of closure costs. A letter documenting the adjustment of the supporting standby trust to the new amount of \$350,753 is provided in Appendix 14.

KW Plastics of California maintains the appropriate coverage for sudden accidental occurrences using Liability Insurance, in accordance with 22 CCR 66264.147(f). A copy of the current Certificate of Insurance for the facility has been provided in Appendix 14.

11.0 SOLID WASTE MANAGEMENT UNIT INFORMATION

40 CFR 270.14(d)/22 CCR 66270.14(d)

On June 28, 1994, the California Environmental Protection Agency, DTSC, issued the Series "A" Resource Recovery Facility Permit/Identification Number CAD 982 435 026 to KW Plastics of California (KW California). The Permit identified four Solid Waste Management Units (SWMUs) and one Area of Concern (AOC) at the Facility based on a RCRA Facility Assessment performed by the DTSC on April 25, 1994. Of the four SWMUs, SWMU No. 1 - Truck Unloading Area and Receiving Hopper, SWMU No. 2 - Trailer Parking Area, and SWMU No. 4 - Recycling Room required no further action, while SWMU No. 3 - Recovery Ponds and AOC No. 1 - Drainage Trough in Production Area required a RCRA Facility Investigation (RFI). A list of the SWMUs and AOC, their physical description, operational history, waste management activities, and other pertinent information are included in Appendix 15. The location of each SWMU is identified on Figure 3: Site Plan.

On December 28, 1994, KW California submitted the *RCRA Facility Investigation Draft Phase I Work Plan* for the initial investigation of the SWMUs and AOC identified in the permit. The work plan was approved by the DTSC on September 12, 1995. After completion of the Phase I RFI activities, KW California submitted the findings in the *RCRA Facility Investigation Report* on December 12, 1995. During the RFI, seven water samples, two sediment samples, and sixty-four soil samples were collected and analyzed for pH, moisture, and lead. Analytical results showed no detectable hazardous constituents present at concentrations exceeding background levels. In addition to the sampling conducted during the RFI, a steel gate valve was installed to separate the Drainage Trough in the Production Area from the drainage trough in the recycling room. On January 9, 1996, the DTSC issued a letter, *Acceptance of Resource Conservation and Recovery Act (RCRA) Facility Investigation Report*, which stated that the RFI was approved, KW Plastics had complied with Sections IV.B and IV.D of their Permit, and no further corrective action was required for SWMU No. 3 - Recovery Ponds and AOC No. 1 - Drainage Trough in Production Area.

12.0 CERTIFICATION OF RCRA APPLICATION AND WASTE MINIMIZATION

40 CFR 270.11/ 22 CCR 66270.11

This section demonstrates compliance with the above-referenced regulatory codes. A signed certification of the accuracy and truth of this application is on the following page.

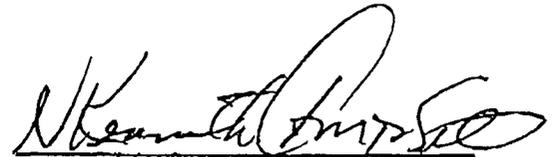
WASTE MINIMIZATION CERTIFICATION

I hereby certify under penalty of law that personnel under my direction and supervision at this facility are undertaking specific steps in accordance with a program in place to minimize the amount and toxicity of the hazardous wastes generated at this facility to a degree economically practicable and that the method utilized for the treatment, storage, or disposal of hazardous wastes is the practical method currently available to this facility which minimizes the present and future threat to human health and the environment. I am aware that there are significant penalties for false certification, including the possibility of fine and imprisonment for flagrant falsifications.

Date:

8/3/2007

Signature:


N. Kenneth Campbell, Co-Owner

CERTIFICATION OF RCRA APPLICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date:

8/3/2007

Signature:


N. Kenneth Campbell, Co-Owner