

RCRA PART B APPLICATION

RINECO  
HAZARDOUS WASTE MANAGEMENT FACILITY  
HASKELL, ARKANSAS

**SECTION F**


CONTINGENCY PLAN

REVISED: August 3, 2001

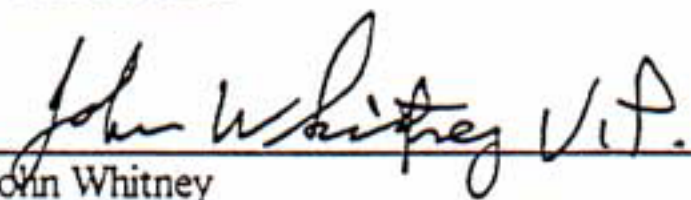
PREFACE #1

According to Regulation 23, Section 264.55 Emergency Coordinator - At all times, there must be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator must be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person must have the authority to commit the resources needed to carry out the contingency plan.


We, the undersigned, approve and acknowledge that all incident commanders have the authority to commit all necessary resources to implement all phases of the contingency plan as deemed necessary and to purchase any and all items necessary to do so.

  
\_\_\_\_\_  
Ken Carle  
Vice President

8/21/98  
Date

  
\_\_\_\_\_  
John Whitney  
Vice President, Operations

8/21/98  
Date

  
\_\_\_\_\_  
Mike Spinks  
Chief Financial Officer

8-21-98  
Date

## PREFACE #2

The internal alarm system is not to be misunderstood as a requirement for the contingency plan to be enacted nor completed. The Rineco internal alarm system shall only be used as a notification to gain the employees attention (i.e., which could include tornadoes, lightning storms, train wrecks, etc.).

### Explosions and Natural Disasters

For the purposes of this document, the aftermath of an explosion will be handled in the same manner as a fire or spill and will not be referenced on its own. Please consider that an explosion is an isolated event, and the aftermath will receive the same response as a fire or spill.

### Evacuation

During the course of an event that may move off facility boundaries and possess potential threat to human, health or the environment, the City of Haskell Mayor will be contacted to facilitate evacuation of residents and businesses (including Union Pacific Railroad). If necessary, Union Pacific Railroads dispatcher will be directly contacted by Rineco to detour rail traffic.

### Interim Status vs. Permitted Facility

Upon final Part B permit action by the Arkansas Department of Pollution Control and Ecology, Rineco will initiate construction of the facility expansions indicated in the Part B Permit Application. Until the expanded facilities (Building #200) are certified for operation, the Contingency Plan will be in effect for the Building #100 facilities only.

### Construction of Conveyor Systems in Building 200

The Part B application documents, as modified through August 11, 1998, have been prepared for the Building 200 facilities to receive and store containers on pallets or other stacking methods on the building floor. Later inclusion of conveyor systems throughout the Building 200 receiving area, around the perimeter, and continuing into Building 100, is planned for more systematic and efficient container management at the facility. Upon implementation of the design of the conveyor system, provisions will be made to ensure that evacuation routes for personnel are maintained throughout the drum storage areas in the case of an emergency requiring evacuation. These provisions will include prevention of drums from lining up in escape aisles, and full consideration of NFPA standards for management of flammable materials on conveyor systems.

## Contingency Plan

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SECTION F  
RINECO  
PART B PERMITTED FACILITY  
CONTINGENCY PLAN

I. INTRODUCTION

This Contingency Plan, herein referred to as "The Plan", has been developed in accordance with the provisions of Reg 23, Section 264 Subpart D. The purpose of the Contingency Plan is to describe the actions which facility personnel will take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, groundwater, or surface water. Whenever the word facility is mentioned, it is synonymous with all company owned property.

This Plan identifies emergency coordinators and describes their responsibilities with respect to initiating and implementing The Plan. For the purpose of this document, the terms emergency coordinator and certified operator are synonymous. Emergency coordinators designated in The Plan are authorized to commit resources necessary to ensure successful implementation (Preface #1).

All holders of The Plan listed in Appendix D (Contingency Plan Distribution List) will be provided copies of any revision to The Plan. The Plan must be reviewed and immediately amended, if necessary, whenever;

- A. The facility permit is revised;
- B. The Plan fails in an emergency;
- C. The facility changes -- in its design, construction, operation, maintenance, or other circumstances -- in a way that materially affects 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.

Situations addressed by The Plan can be generally categorized as follows:

- A. Areas outside the facility (company property) are affected or threatened by an on—site incident.
- B. Only areas or personnel within the plant are affected, or threatened, but outside

assistance is required.

- C. Areas or personnel within the facility are under no significant threat, but compliance with applicable regulations requires notification of one or more agencies and the initiation of corrective actions.

Although The Plan provides the basic framework consistent with state and Federal regulations for responding to threatening situations, it cannot prescribe detailed procedures for each individual under all possible circumstances. It is Rineco's policy to seek to reduce the probability of threatening situations by emphasizing preventative measures in the facility's design and operation. To ensure a prompt and effective response in the event that threatening conditions do occur, training programs stress procedures and techniques to be employed during emergency situations.

This plan is intended to address situations which may occur anywhere on the facility and encompasses all operational units and areas which exist within property boundaries.

## II. GENERAL INFORMATION

Facility Name: Rineco

Location: 1007 Vulcan Road - Haskell  
Benton, AR 72015

Facility Contact: John Whitney  
Vice President, Operations  
(501)778-9089

Site Plot Plan: See Appendix A (Site Plot Plan)

### Facility Operations:

Receipt, Storage, Analysis, Recycling of Hydrocarbon Waste Streams and Fuel Blending. Hydrocarbon compounds are recycled into new products or raw materials for other industrial manufacturing activities. Organic solids may be ground, dissolved, or suspended in oils, spent solvents, and liquid wastes to produce a specific BTU level for burning in cement kilns.

## III. EMERGENCY COORDINATORS [Reg 23, Section 264.55]

Names, addresses, and telephone numbers of primary and alternate Emergency Coordinators are provided in Table 1 (Emergency Coordinators). As used herein, "Emergency Coordinator" shall mean any or all of the following personnel, with the understanding that the "Primary Emergency Coordinator" has primary responsibilities under The Plan and is the person identified as such in Table 1 (Emergency Coordinators). An Emergency Coordinator list will be posted in the security office at all times. Names, addresses, and telephone numbers of primary and alternate Emergency Coordinators are as follows:

Revised 8-11-98

Table 1  
Emergency Coordinators / Certified Operators

<u>Name</u>	<u>Responsibility</u>	<u>Work Phone Number</u>	<u>Home Phone Number</u>
S. Bradley Cummock 2007 Turkey Track Benton, AR 72015	Primary	778-6325	315-1308
Jimmy D. Brown 6219 Edgewood Benton, AR 72015	Secondary	778-6325	316-1954
John P. Whitney 12201 Mara Lynn Rd.; Apt. 2103 Little Rock, AR 72211	Tertiary	778-9089*	217-8538
Danny Carter 2760 Blaney Hill Road Conway, AR 72032	Tertiary	778-9089*	327-8818
Douglas M. Corter 1125 Dawson Malvern, AR 72104	Tertiary	778-6325	332-4268
W. Sid Emmons 423 West Ashley Benton, AR 72015	Tertiary	778-6325	778-2443
Thomas Jones 921 Stamford Drive Benton, AR 72015	Tertiary	778-6325	316-1001
Alan W. King 515 Sharon Oaks Court Benton, AR 72015	Tertiary	778-6325	776-8407
Michael Tallent 457 Raper Road Benton, AR 72015	Tertiary	778-9089*	776-8455



Table 1  
Emergency Coordinators / Certified Operators  
(Continued)

<u>Name</u>	<u>Responsibility</u>	<u>Work Phone Number</u>	<u>Home Phone Number</u>
Larry D. Williams 97 Aberdeen Drive Little Rock, AR 72211	Tertiary	778-6325	868-9546

\* After 6:00 p.m. weekdays and on weekends, operators may be reached at 778-6325.

NOTE: All Emergency Coordinators meet the requirements of Arkansas Pollution Control and Ecology Commission Regulation No. 23, Section 264.16(f) regarding the Certification of Operators.

At all times there will be an Emergency Coordinator either on the facility premises or on call, i.e., available to respond to an emergency by reaching the facility within a short period of time, with the responsibility for coordinating all emergency response measures. The Emergency Coordinator will be thoroughly familiar with all aspects of the facility Contingency Plan, all operations and activities at the plant, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, the Emergency Coordinator has the authority to commit the resources needed to carry out the Contingency Plan and is solely in charge for each incident that occurs on the Rineco property.

#### IV. EMERGENCY TELEPHONE NUMBERS

Table 2 (Emergency phone number) lists of various organizations are provided in the event that may be requested to provide assistance in case of an emergency condition. They may otherwise be notified in accordance with other provisions of The Plan. Representatives of the listed local organizations have been provided copies of The Plan and have agreed to provide assistance as specified in The Plan.

#### V. IMPLEMENTATION [Reg 23, Section 264.52(a) - 264.52(d)]

The Plan will be implemented immediately in the following situations:

##### A. Fire and/or Explosion

1. A fire causes, or has the potential for causing the release of harmful (i.e., hazardous, noxious, etc.) fumes off the facility.
2. A fire spreads and is likely to ignite fuel and/or other liquid wastes or could cause heat induced explosions.
3. A fire is likely to spread to off-facility areas.
4. An imminent danger exists that an explosion could occur causing a safety or health hazard or release of hazardous material.
5. An imminent danger exists that an explosion could ignite other hazardous wastes at the facility.

Table 2  
Emergency Phone Numbers

Whenever calling any of these agencies, be prepared to give the following information:

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

LOCAL AUTHORITY: Mayor Jeff Arey-----776-2666

EMERGENCY: INJURY

Saline Memorial Ambulance Service -----776-6000

Saline Memorial Hospital -----776-6000

Family Practice Associates (Company Physician) -----778-0934

EMERGENCY: EXTENSIVE OR MULTIPLE PERSONNEL INJURIES

Saline Memorial Ambulance Service -----776-2020

Saline Memorial Hospital -----776-6000  
(See Appendix A for map and directions to hospital)

Family Practice Associates (Company Physician) -----778-0934

Baptist Medical Center -----202-2000

Office of Emergency Services -----303-5667

Daytime -----303-5668

Beeper -----688-4266

Beeper -----688-4341

EMERGENCY:FIRE EXPLOSION

Haskell Fire Department (Fire Control) -----776-2000

Fire Chief Brian Cotten -----776-1021

Haskell Police Department (Primary Evacuation) -----778-4916

Saline County Sheriff (Secondary Evacuation) -----303-5648  
 Department of Pollution Control & Ecology (Little Rock) -----682-0744  
 EPA Region VI -----1-214-665-2222  
 Office of Emergency Services -----303-5667  
     Daytime -----303-5668  
     Beeper -----303-2667  
 National Response Center -----1-800-424-8802  
 Union Pacific Railroad (Train Dispatcher) -----1-800-272-8777

**EMERGENCY:     HAZARDOUS MATERIAL SPILL OR RELEASE**

Office of Emergency Services -----303-5667  
     Daytime -----303-5668  
     Beeper -----303-2667  
 Department of Pollution Control & Ecology (Little Rock) -----682-0744  
 Haskell Police Department (Primary Evacuation) -----778-4916  
 Saline County Sheriff (Secondary Evacuation) -----303-5648  
 EPA Region VI -----1-214-665-2222  
 National Response Center -----1-800-424-8802  
 Union Pacific Railroad (Train Dispatcher) -----1-800-272-8777

**EMERGENCY:     NATURAL DISASTERS**

Office of Emergency Services -----303-5667  
     Daytime -----303-5668  
     Beeper -----303-2667  
 Office of Emergency Services (State) -----730-9750

## B. Spills or Material Release

It is the policy of Rineco that all spills are cleaned up, no matter how small or large, immediately. For large spills, all operations in the area will be stopped and will not resume until the spill has been cleaned up and the source of the spill has been identified and remedied. Employees are trained on the proper techniques of clean-up and use of specialized equipment. Should a spill occur beyond capacity of the plant employees, that is the point The Plan will be enacted. The following specific occurrences will require enactment of the Plan:

1. A spill cannot be contained within the facility resulting in a potential for off-site soil contamination and/or ground or surface water pollution.
2. A spill can be contained within the facility boundaries, but a potential exists for groundwater or surface water contamination.
3. A spill could cause the release of toxic vapors or fumes into the atmosphere in concentrations which present threats to employees or to persons outside the facility.
4. A spill results in release of flammable liquids or vapors in sufficient amounts to cause a fire or explosion hazard that is not manageable by plant employees.
5. Any release of hazardous material to the environment equal to or greater than the reportable quantity under 40 CFR 302 will be reported to the Regional Administrator within 25 hours of its detection [Reg 23, Section 264.196(d)(1)]. Within 30 days a written report will be submitted to the Regional Administrator in accordance with Reg 23, Section 264.196(d)(3).

## C. Natural Disasters

Events (i.e., floods, tornadoes, earthquakes) that occur will normally cause either a fire or spill. At that point, refer to the appropriate procedures in Section VI. The following natural events are included:

1. Floods resulting from heavy rainfall which could carry, or have the potential to carry, hazardous material off-site.
2. Tornadoes which could carry hazardous material off-site as well as release hazardous material on-site.
3. Earthquakes which could structurally damage buildings, equipment, and containers or tanks.

Release of hazardous material with potential for release of vapors or fumes will be determined visually when possible and monitored by appropriate monitoring devices, when visual observation is not possible.

Once the emergency has been defined and The Plan implemented, ambient air sampling will be initiated to accurately document the extent of potential exposure and release. Visual inspections and monitoring will be carried out only by trained personnel.

Section VI-B presents detailed procedures for identifying and classifying materials which may be released.

## VI. EMERGENCY RESPONSE PROCEDURES

A. Notification [Reg 23, Section 265.56(a)]. Any person who has reason to believe that an emergency or reportable condition, as described in Section V, exists within the Facility shall notify the Emergency Coordinator. The Emergency Coordinator shall assess the condition and, if appropriate, initiate the notification procedures described below.

### 1. Internal Notification.

The following describes the conditions requiring notification of Facility personnel and the means of notification to ensure a knowledgeable and timely response:

- a. Conditions not presenting an immediate threat to health or the environment, but requiring prompt corrective actions and/or written notification of non-compliance to regulatory agencies, shall be immediately reported to the Environmental Compliance Officer, the person directly in charge of the affected area, and to The Plant Manager/Emergency Coordinator.
- b. Conditions presenting an immediate threat shall be cause for activating the emergency response notification. The emergency response notification shall consist of verbal instructions by the emergency coordinator or his designee. Attention may be solicited through the use of the telephone paging system, a radio, air horn, sounding of the alarm or megaphone, etc., to gain the attention of the plant personnel that an emergency situation exists on-site, that operations within all areas are to be discontinued, and that evacuation is required by non-essential personnel.

### 2. External Notification

The following procedures will be implemented, as necessary, to request assistance from outside agencies to comply with regulatory reporting requirements and to inform public officials/public agencies having jurisdiction of events or conditions which might prompt inquiries by members of the public. (For more detailed reporting requirements, refer to

Section VII.)

- a. Whenever the Emergency Coordinator determines that an emergency condition requires outside assistance, appropriate agencies/ organizations identified in Table 2 (Emergency Phone Numbers) shall be called. In all such cases, the Arkansas Department of Pollution Control and Ecology, and the State Office of Emergency Services, shall be promptly called by available means.
- b. The National Response Center shall be promptly notified by the Emergency Response Coordinator if one of the following occurs;
  - (1) A spill of hazardous material equal to or greater than the reportable quantity under 40 CFR 302.4 (list of hazardous substances and reportable quantities). Reportable quantities are described in 40 CFR 302.5.
  - (2) Any spill not contained on site will be reported to the National Response Center and the Office of Emergency Services or the Arkansas Department of Pollution Control and Ecology.
- c. **Written Reports.** Whenever external notification conditions "a" and "b" occur, written reports shall be submitted to the Regional Administrator and the Director of the Department of Pollution Control and Ecology within 15 days of the date of the incident.
- d. **Operating Record.** All incidents which require implementation of the emergency response plan and/or spills will be documented in the Facility's Operating Record.

B. Identification of Hazardous Materials [Reg 23, Section 264.56(b)]

The Emergency Coordinator will, through his familiarity with all operations and activities of the Facility, immediately identify the exact source, amount, and extent of any released materials, the location, and characteristics of the waste handled. Identification may be made either by observation or review of facility records or manifests, and, if necessary, by chemical analysis.

Hazardous material identification placards are placed around the perimeter of Building #100 and #200 that will identify the hazardous properties of the waste stored within the buildings. The storage tanks have individual placards for identification of the hazardous properties for the waste stored within them. In addition, individual incompatible containers will be stored in segregated rows within individual isolation boxes for specific containment within Buildings #100 and #200. These containers will have individual placards for identification purposes.

The generic hazard classes of the common types of waste that will be stored at the Rineco facility include:

1. Flammable Liquids
2. Flammable Solids
3. Corrosive Liquids - (Acids and Bases)
4. Toxic Liquids and Solids - bearing heavy metals;
  - a.) Arsenic
  - b.) Barium
  - c.) Cadmium
  - d.) Chromium
  - e.) Lead
  - f.) Mercury
  - g.) Selenium
  - h.) Silver
5. ORM-E Waste (Chlorinated Solvents)
6. Poisons
7. Oxidizers
8. Compressed Gas (Aerosol Cans)
9. Combustibles (Liquids and Solids) and,
10. Irritants

Profile Sheets containing the physical and chemical characteristics of all wastes stored and treated at the Facility are maintained by the Laboratory Manager and a computer automated filing system.

These Profile Sheets contain pertinent information including identification numbers which can be cross referenced using the Emergency Response Guide manual to obtain the following:

1. Identification of chemical components in each waste stream.
2. Identification of each wastes hazardous characteristics, e.g., toxicity, reactivity, and ignitability.
3. Important chemical and physical properties for which data are available, e.g.,



vapor pressure, pH, and solubility in water.

4. Fire control procedures, e.g., water or chemical foam.
5. Appropriate procedures to counteract human exposure, e.g., thorough washing with soap and water in the event of contact with the skin, etc.

### C. Hazard Assessment

The Emergency Coordinator will assess possible hazards to human health or the environment that may result from the release, fire, or explosion. The steps to be taken are as follows:

1. Identify the wastes involved in the incident.
2. Identify the source and amount of waste involved in the incident.
3. Review the appropriate Profile Sheets and other reference material to determine what the potential effects of exposure/release might be, and what the appropriate safety precautions are.
4. Identify exposure and/or release pathways and determine the quantities of material involved.
5. Assess the extent to which mixtures of the affected chemicals may pose hazard to human health. Include a compatibility determination and a determination of the integrated toxicity of the mixture.

This assessment will involve both direct and indirect considerations of the release, fire, or explosion, e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated or the effects of any hazardous surface water runoff from water or chemical agents used to control fire and heat.

If the incident cannot be controlled by plant personnel without incurring undue risk, the Emergency Coordinator will order evacuation of all workers at risk. If a determination is made that areas outside of the Facility are at risk as a result of the incident, the Emergency Coordinator will contact the appropriate agencies and departments as listed in Table 2 (Emergency Phone Numbers) to advise them of the risk involved. The Emergency Coordinator will be available to help appropriate officials decide whether affected local areas should be evacuated. The following information must be given:

1. Name and telephone number of the reporter.
2. Name and address of the Facility.

3. Time and type of incident, e.g., release, fire.
4. Name and quantity of materials involved.
5. The extent of injuries, if any.
6. The possible hazards to human health or the environment and clean-up procedures.

D. Control Procedures [Reg 23, Section 264.52(a)]

Potential accidents fall under three general classifications:

1. Fire and/or explosion;
2. Spills or airborne material releases; and
3. Natural disasters.

For purposes of this section, control procedures for natural disasters shall follow the procedures as for fires, explosions, or spills. The actions described below constitute the general responses and control procedures to be initiated in the event of a fire or release of hazardous waste to air, land, or water which results from any operation within the Facility. (See Figure F-1, Emergency Response Action Plan of the following page).

# Emergency Response Action Plan

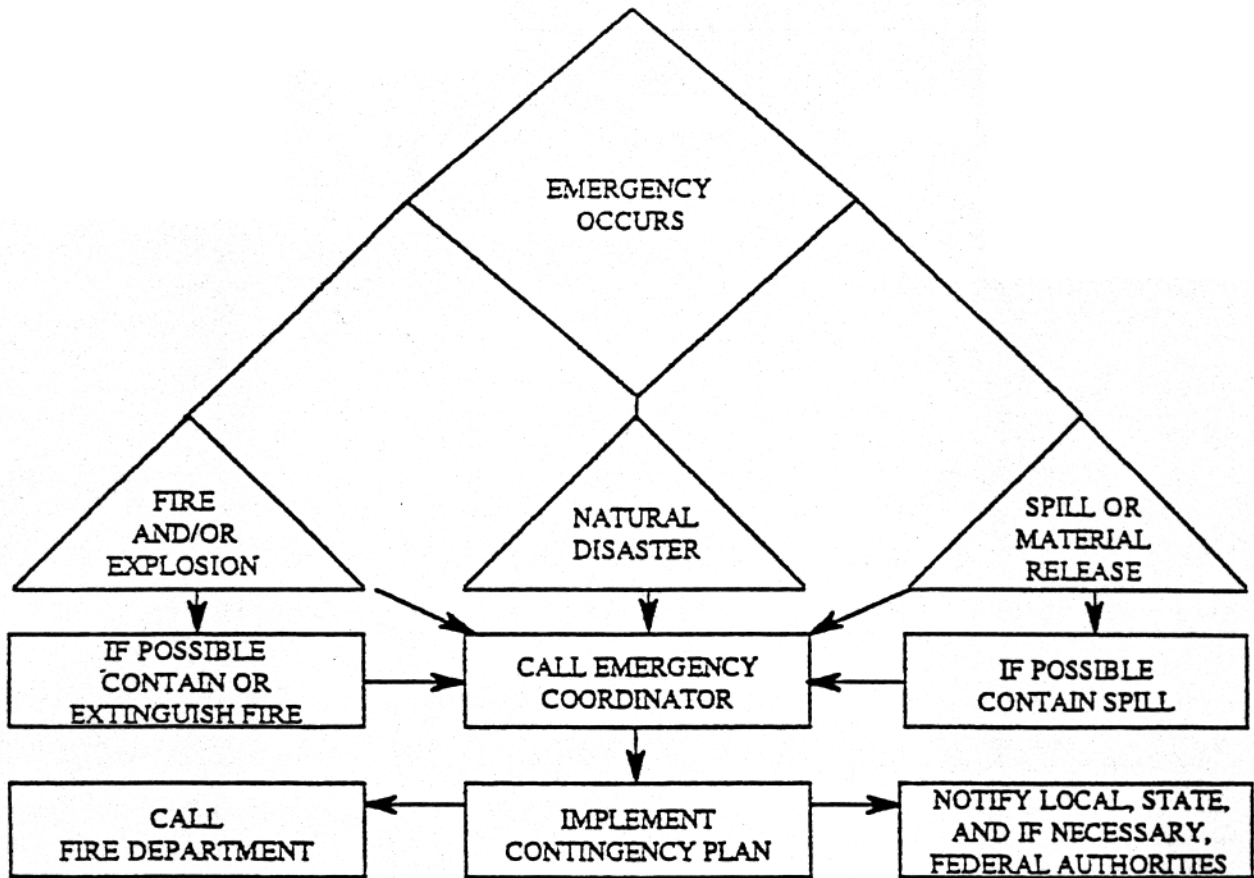


Figure F-1

The initial response to any emergency will be to protect human health and then the environment. Response steps are discovery, identification, assessment, request for assistance, containment, treatment, disposal, and notification of regulatory agencies in a timely manner.

1. Fire and Explosions.

Should a fire occur that requires initiation of the Contingency Plan by the emergency coordinator. The Facility Hazardous Materials Response Team (HMRT) will be activated and directed to the affected area per the Emergency Response Manual. If required, the City of Haskell Fire Department will be called to provide necessary support.

The following actions will be taken:

- a. Work in affected areas will be shut down immediately at the direction of the supervisor.
- b. The supervisor responsible for the area will assure that affected personnel not actively involved in fighting the fire are evacuated from the Facility to designated places.
- c. In circumstances other than dire threat to life or health, injured personnel will be removed to safety at the direction of Safety Department personnel unless there is a life-threatening event that would require immediate on the scene medical treatment. This will be administered by either members of the safety department or ambulance personnel if outside assistance has been obtained. The severity of the injuries, as determined by Safety Department personnel, will dictate how the injured are to be moved (by stretcher, etc.) and who should administer medical treatment.
- d. The emergency coordinator or designee responsible for the affected area shall designate one or more employees to stop vehicular traffic (with the exception of emergency vehicles) into the area until the situation is controlled and safety is restored.
- e. The emergency coordinator or designee responsible for the area will identify possible additional sources of ignition and assure that they are shut down or locked out (in the case of electrical motors).
- f. As deemed necessary by the HMRT Leader or Emergency Coordinator, the HMRT will respond with foam equipment and hoses, flushing the affected area with appropriate quantities of sand, water, or foam.

- g. The Emergency Coordinator will make a determination that the emergency has passed and all equipment is cleaned and replaced prior to service.
- h. The Emergency Coordinator or his designee will assure that all emergency equipment used in the response has been cleaned and made fit for use prior to resumption of Facility operation in the affected area.

2. Spills

- a. Spills that are controlled by trained plant personnel and managed without threat to human health or the environment do not invoke this contingency plan.
- b. The Emergency Coordinator shall immediately assess the magnitude and potential seriousness of the spill or release by reviewing the following:
  - (1) Profile Sheets or other pertinent information regarding the chemicals spills or released.
  - (2) The source of the release or spill.
  - (3) An estimate of the quantity released and the rate at which it is being released and the amount which potentially could be released.
  - (4) The direction in which the liquid spill or air release of potentially harmful vapors is heading, noting meteorological variables such as extent of clouds, wind speed and direction, precipitation, and temperature.
  - (5) The personnel who may be or may have been in contact with the material and possible injuries involved.
  - (6) The potential for fire and/or explosion resulting from the accident.
  - (7) An estimate of the area under possible influences of the spill or release.
  - (8) An estimate of potential for contamination of surface water and contact with reactive and/or incompatible material as a result of the release.
- b. If the Emergency Coordinator determines that an emergency condition exists, the following actions will be taken:
  - (1) If the spill or release involves a tank or the contained area of a tank, all lines to the tank will be closed by personnel at the direction of either the

supervisor responsible for the affected area or the Emergency Coordinator.

- (2) Immediately after the spill is detected, efforts will begin to recover any standing liquids using vacuum trailers and/or pumps.
- (3) If, for some reason, a chemical spill is not contained within a contained or sump area, a perimeter of isolation will be established around the spill by constructing a second dike.
- (4) If the spill results in the formation of a toxic vapor cloud (by reaction with surrounding materials or outbreak of fire), a film forming foam (such as ansulite 3% or equivalent) will be applied to the surface for vapor suppression.
- (5) All equipment and material used to clean up the spill will either be containerized or decontaminated and made fit for use prior to resumption of operations or will be disposed of in approved facilities.
- (6) All contaminated material will be handled, stored, transported, and treated, or disposed of as hazardous waste in accordance with state and federal regulations.

As a means of protecting groundwater, interceptor ditches may be required downgradient of temporary impoundments constructed to contain and remove spilled liquids. Liquids will be removed from the interceptor ditches using vacuum trailers or pumps.

When recovering a flammable material from the groundwater, explosion and spark-proof pumping equipment, tools, and clothing are to be used because of the possible presence of explosive vapors.

### 3. Spill Containments or Containment Systems

All facility storage units are equipped with secondary spill containment. As the name suggests, spill containment is designed to contain spills in order to prevent the spread of contamination into the environment. Containments are not designed to store hazardous wastes. Thus, it is important that spills or leaks of hazardous waste be removed and the affected containment area be decontaminated, immediately following correction of the spill or leak at its source. Prompt and thorough decontamination of containment areas is also necessary to prevent contamination of precipitation run-off which is collected on the containment systems and to prevent the spread of contamination by workers walking through an improperly decontaminated area.

#### 4. Access

In-plant roads provide reasonable access for emergency equipment to all areas where hazardous wastes are stored or treated. To facilitate emergency traffic and reduce overall hazards, normal traffic will be discontinued in affected areas of the Facility and on all in-plant roads leading to such areas. Until evacuation is signalled, all supervisors, or their designees, (including contractors) who are not in an affected area will stay with their personnel and be ready to evacuate and account for personnel under their supervision. Personnel other than emergency personnel will not be permitted in affected areas while an emergency condition is deemed to exist.

The Facility continuously monitors aisle space per the Facility inspection schedule, to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in case of an emergency.

Employees will not engage in non-essential telephone conversation while an emergency condition is deemed to exist. All Facility visitors other than emergency personnel will be required to leave the Facility until the emergency condition is brought under control and normal operation is resumed.

#### E. Prevention of Occurrence, Recurrence, or Spread of Fires, Explosions, or Releases [Reg 23, Section 264.56(e)]

Generally, actions to prevent the occurrence, recurrence or spread of fires, explosions, or releases include stopping processes and operations, collecting and containing released waste, and recovering or isolating spilled materials as described in other sections of The Plan. In addition, if the Facility stops operations in response to an emergency, the Emergency Coordinator or designee will monitor valves, pipes, and other equipment for leaks, pressure build-up, gas generation, or ruptures.

The Facility Training Program addresses the specific actions to be taken in an emergency.

If ignitable wastes are involved, the Emergency Coordinator or designee will identify possible sources of ignition and assure that they are shutdown, removed from the area, or, in the case of electrical motors, locked out in the off position. Suitable equipment and clothing will be used in the containment and clean up areas.

Any materials that could be reactive with materials spilled or released will be removed from the area by plant personnel at the direction of the Emergency Coordinator or supervisor of the affected area. Absorbent pads, booms, earth, sandbags, and other inert materials may be placed in the path of releases in an effort to contain the release to as small an area as possible. The materials will be placed by plant personnel or emergency response personnel at the direction of the Emergency Coordinator.

#### F. Storage and Treatment of Released Materials

Revised 7-30-99

Immediately after an emergency, the Emergency Coordinator will make arrangements for treatment, storage, or disposal of recovered wastes, contaminated soil, surface water, or any other contaminated materials.

Spilled material will be stored in containers which are compatible with the chemical/physical nature of the spilled materials.

G. Incompatible Wastes [Reg 23, Section 264.56(h)(1)]

Except as may be necessary to remove spilled wastes and contaminated materials, treatment, storage, or disposal of incompatible waste will not be permitted in affected areas until clean-up procedures are completed. Where such activities are required, plans shall first be approved by both the manager of the Facility's laboratory and the Emergency Coordinator.

H. Post Emergency Equipment Maintenance [Reg 23, Section 264.56(h)(2)]

After an emergency event, all emergency equipment used in the response will be cleaned so that it is ready to be used again, or it will be replaced. Solvents for cleaning and all related residues will be stored in appropriate containers for disposal. All emergency equipment listed in Appendix B Emergency Equipment will be inspected and repaired or replaced, as necessary, prior to resumption of operations.

Upon resumption of operations in the affected area, the Facility must notify the Regional Administrator, the Director of the Arkansas Department of Pollution Control and Ecology and the Saline County Office of Emergency Services of the following:

1. All emergency equipment listed in Appendix B Emergency Equipment is clean and ready for use.
2. Clean-up of the affected area has been sufficiently completed so that treatment, storage, or disposal operations in the affected area(s) can be resumed without risk of treating, storing, or disposing of waste which might be incompatible with the released material.
3. The source of the spill has been determined and remedies have been taken to prevent a reoccurrence of the incident.

VII. Required Reporting [Reg 23, Section 264.56(j)]

A. Incident Reporting

All incidents that require implementation of the Contingency Plan must be recorded in the operating record by the facility owner or operator. Information to be recorded includes the time,



date, and details of the incident. Within 15 days after the incident, the owner or operator must submit a written report on the incident to the Regional Administrator of the Environmental Protection Agency and to the Director of the Arkansas Department of Pollution Control and Ecology. The report must include the following:

1. Name, address, and telephone number of the owner or operator;
2. Name, address, and telephone number of the facility;
3. Date, time, and type of incident (e.g., fire, explosion);
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. Estimated quantity and disposition of the recovered material that resulted from the incident.
8. Procedures or equipment put in place to prevent a recurrence of the incident.

B. Emergency Notification Time Periods

The National Response Center ((800) 424-8802) must be notified within a 24-hour period of any release of a hazardous substance in a quantity equal to or exceeding the reportable quantity.

The nearest Area Director of the Occupational Safety and Health Administration, U.S. Department of Labor, must be notified, either orally or in writing, within 48 hours after the occurrence of any employment accident which is fatal to one or more employees or which results in hospitalization of five or more employees.

The Arkansas Department of Pollution Control and Ecology, per an understood agreement, shall be notified within 24 hours after the occurrence of any release of a hazardous substance in a quantity equal to or exceeding the reportable quantity, or any fire, fatality, or injury or illness which results in the hospitalization of five or more employees.

Within 15 days after the incident, the owner or operator must submit a written report on the incident to the Regional Administrator of the Environmental Protection Agency Region 6 and to the Director of the Arkansas Department of Pollution Control and Ecology.

A release of hazardous material equal to or greater than the reportable quantity under 40 CFR

302 will be reported to the Regional Administrator within 24 hours of its detection. Within 30 days a written report will be submitted to the Regional Administrator in accordance with 40 CFR 265.197 (c)(3).

#### VIII. Coordination Agreements

Representatives of the local organizations listed below and Emergency Response Coordinators have reviewed this Plan and have agreed to provide assistance in the event that an emergency situation develops at the facility which requires their assistance. They have also agreed to work with Rineco in a continuing effort to familiarize themselves with the facility's operations and to provide technical assistance in refining The Plan as appropriate in view of advances in technology and emergency response procedures.

- A. Baptist Medical Center
- B. Benton Fire Department
- C. Family Practice Associates, company physician
- D. City of Haskell Fire Department
- E. City of Haskell Police Department
- F. Union Pacific Railroad (Union Pacific Train Dispatcher)
- G. Saline County Office of Emergency Services
- H. Saline Memorial Hospital

The City of Haskell Police Department will serve as a point of coordination between Rineco, the Arkansas Office of Emergency Services, and Arkansas Department of Pollution Control and Ecology, and the Arkansas Department of Health with respect to the development and implementation of local emergency response plans.

Appendix A  
EVACUATION PLAN

Revised 8-11-98

## Appendix A Evacuation Plan

Upon arrival, the Primary Supervisor on duty shall relinquish his authority to the Emergency Coordinator. If the Emergency Coordinator is not an Incident Commander, then the Emergency Coordinator will relinquish his authority to the Incident Commander upon his arrival. Such established procedures will be followed as closely as possible; however, in the specific emergency situations, the Emergency Coordinator may deviate from the procedures to provide a more effective plan for bringing the situation under control. The Emergency Coordinator is responsible for determining which emergency situations require plant evacuation. Planned evacuation routes are indicated on the following Figure 006 (Fire Control, Safety Equipment, Security and Evacuation Routes).

### 1. Facility Evacuation

Only the Emergency Coordinator or designee is authorized to initiate facility evacuation procedures. In the event the Emergency Coordinator is not on-site during night shifts, the primary supervisor on duty or designee may authorize evacuation of the facility. The primary supervisor on duty must immediately call the Emergency Coordinator.

Entrance to the facility will be blocked for non-essential personnel by personnel stationed on the perimeter roads leading to the facility. The primary supervisor on duty or designee, Emergency Coordinator or designee will designate personnel who will barricade the roads. The main gate will serve as the primary point of evacuation from the facility. If, for some reason, the main gate is not usable for evacuation, the Emergency Coordinator, the primary supervisor on duty or designee, shall specify which gate is to be used for plant evacuation. An employee will be posted to direct traffic to the alternative gate. The Emergency Coordinator or designee will direct the office to notify outside agencies of the change in evacuation gates. Evacuation is signaled by a single continuous blast using the designated air horn. When the air horn is sounded, all supervisory personnel shall establish radio communications and begin evacuation procedures; all other personnel begin evacuation procedures upon sounding of the horn.

The following describes procedures to be used whenever the facility is to be evacuated:

- A. The guards will immediately open the gates. No further entry of visitors, contractors, or trucks will be permitted. Unnecessary vehicle traffic within the plant will cease in order to allow safe exit of personnel and movement of emergency equipment.
- B. Unnecessary personnel, visitors, and contractors will immediately leave through the exit gate.
- C. No persons shall remain in or re-enter the facility unless specifically authorized under The Plan or specifically authorized by the Emergency Coordinator. In allowing this, the Emergency Coordinator assumes responsibility for those persons within the perimeter.

Those within the fenced area will normally only include Hazardous Materials Response Team (HMRT) personnel or emergency teams, or other personnel deemed necessary by the Emergency Coordinator.

- D. All evacuated persons shall remain outside the gate in the designated assembly areas (following Figure 006), parking area north of the plant and south of Vulcan Road, or depending upon wind direction, south of the facility, and will be accounted for by their immediate supervisors or designees. To assist in this endeavor, the Emergency Coordinator or designee will use internal hand held radios or phone systems to call the primary supervisor on duty or designee to inform him of the nature of the emergency and exits to be avoided.
- E. During exit, the primary supervisor on duty or designee should keep his or her group together. Immediately upon exit through the gate, each department head will prepare a list of all the following:
  - (1.) Unaccounted personnel for in their department.
  - (2.) Personnel with other emergency training.
  - (3.) Visitors and contractors.

All other personnel who have persons reporting to them should report immediately to the assembly area for final accounting. Upon completion of the employee list, the primary supervisor on duty or designee will hand carry the list of personnel unaccounted for to the Emergency Coordinator or designee.

- F. Personnel will remain at the assembly area. No other employees shall have access to the Emergency Coordinator/Incident Commander. All questions must go through his designee.
- G. Contract personnel should also be listed with the name of their company. Plant security shall maintain a visitor and contractor log which shall be transported to the assembly area to assist accountability.
- H. The names of the HMRT and/or other emergency team members involved in emergency response will be reported, in writing, to the front gate by the HMRT leader, primary supervisor on duty, or designee.
- I. Only authorized management, emergency response personnel, or other personnel deemed necessary by the Emergency Coordinator will be permitted to enter emergency areas to find persons not account for. This reconnaissance shall be coordinated by the Emergency Coordinator.

- J. An assigned plant employee at each designated assembly area will update the list of all personnel to aid in the accountability procedure.
- K. Re-entry into the evacuated area will be made only after clearance is given by the Emergency Coordinator.

2. Partial Evacuation

Non-essential personnel must leave the affected area(s) to facilitate emergency response measures. Partial evacuations may be triggered by any of the following events, but not limited to one:

- A. Spill or leak.
- B. Isolated controlled fire.
- C. Leak or spill on a tanker truck or truck carrying containerized waste.

All non-essential personnel, including contractors and visitors, will be advised by the primary supervisor on duty or designee to move to an exit gate, or to another appropriate area, and to remain there until all personnel are accounted for. Such partial evacuations will typically involve only a small number of people, and in the case of an isolated spill or leak, no evacuation may actually take place. In any event, no person except essential emergency response, management personnel, or personnel designated by the Emergency Coordinator, will be permitted to enter the affected area until specifically authorized by the Emergency Coordinator.

## Appendix B Emergency Equipment

This Appendix describes and gives the location of emergency equipment available for Plan use (See Appendix A).

All emergency equipment is frequently inspected as to availability and service in case of emergencies. In addition, inspections are conducted after each use.

The facility is equipped with several mechanisms to control fires. There are two fire hydrants located near the plant which are shown in Appendix A Site Plot Plan.

### 1. First Aid Supplies

First aid supplies are maintained in the Safety Department, the Emergency Response Building, and the Security Office.

Emergency eyewash fountains and emergency showers are located in all work areas. A sign reading "Emergency Shower" or "Emergency Eyewash" is posted at each unit.

### 2. Protective Clothing and Equipment

Protective clothing and equipment is provided to each employee as a normal orientation procedure.

Additionally, Appendix B (Emergency Equipment), and the Emergency Response Manual list on-site equipment which is available for emergency response.

<u>Material/Equipment</u>	<u>Location</u>	<u>Capabilities</u>
One (1) Combination back-or front-end loader	Within facility	Containment of large small spills (i.e., dikes), move materials, etc.
One (1) front end loader	Within facility	Movement of materials 1.10 yards per load. Containment of large or small spills (i.e., dikes), move materials, etc.
Fire Extinguisher System:		
Twenty pound ABC fire extinguishers	Spaced per NFC in facility buildings, tank areas, etc.	Extinguishing of small fires

Revised 8-11-98

Halon fire extinguisher	Electrical power room Lab Annex	Containment and extinguishes small fires
One (1) Angus AF-100 foam unit with related equipment, i.e., hoses, nozzles, foam eductor	West side of Bldg. 100	Pumping pressure of 70 #psi for extinguishing of large or small fires
Self contained breathing units	Emergency response building	Thirty minute air packs for entering oxygen deficient areas
Five minute escape units	Emergency response building and Laboratory	Five minute escape units for leaving oxygen deficient areas
Chemical resistant suits 3 level "A" 3 level "B plus"	Emergency response building	IDLH atmospheres
Diaphragm pumps  (a) three (3) 2" pumps with six (6) fifteen foot chemical hoses  (b) one (1) 3" pump with two (2) twenty foot hoses	Plant production department	Pumping liquid materials from one location to another location
One (1) pick-up truck	Assigned department (maintenance, material handling, safety, and security)	Transportation of personnel equipment, or materials
One-hundred 30 pound bags (minimum) of fine sawdust	Material Handling department	emergency spill equipment for internal and/or external use
(a) Four (4) shovels	Emergency response building	emergency spill equipment for internal and or external

Revised 8-11-98



- (b) Two (2) rakes use
- (c) One (1) sharpshooter shovel
- (d) One (1) aluminum scoop
- (e) Three (3) rolls barricade tape
- (f) One (1) sign for authorized personnel only
- (g) One (1) box disposable boots
- (h) Two (2) cone shaped road markers
- (i) Five (5) trash cans
- (j) Miscellaneous brooms, visquen sheeting, water hoses, gloves, rags, etc.
- (k) Four (4) childrens' swimming pools

Communication system:

Hand held radios	Supervisors and designated personnel have radios throughout the facility	Immediate communication within the facility
Telephone system	Facility offices and buildings	Internal and external communication

Alarm System:

Fire Siren	Outside plant compressor building	Internal notification of emergency, i.e., fires, tornadoes, evacuations, etc.
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Revised 8-11-98

Bull horn (back-up system)

Security office

Internal notification of  
emergency, i.e., fires,  
tornadoes, etc.

Available Portable Air Sampling / Testing Meters:

Three (3) Drager Multi-Pacs, or equivalent units, with one (1) in possession of the tank cleaning crew, and two (2) in possession of the Safety Department, Bldg. 100.

Three (3) Thermo Model 580B. OVM/datalogger, or equivalent units, with two (2) in the maintenance shop, and one (1) stored downstairs in Production Control Room for production use.

Revised 8-11-98



## Appendix D

### Contingency Plan Distribution List

#### By Position:

1. Vice President, Administration and Marketing
2. Vice President, Operations and Marketing
3. Vice President, Research and Development (Tertiary Emergency Coordinator)
4. Director, Environmental and Regulatory Compliance (Tertiary Emergency Coordinator)
5. Plant Manager (Primary Emergency Coordinator)
6. Laboratory Manager (Tertiary Emergency Coordinator)
7. Safety Officer
8. Plant Maintenance Supervisor
9. Other Designees that meet ADEQ requirements

#### By Location:

1. Plant Manager's Office
2. Environmental Department
3. Security Office
4. Emergency Response Center
5. Training Department
6. Main Office
7. Lab
8. Control Rooms

#### By Agency:

1. U.S. EPA Region VI
2. Arkansas Department of Pollution Control and Ecology
3. Office of Emergency Services
4. Saline County Sheriff's Department
5. City of Haskell Police Department
6. City of Haskell City Mayor
7. City of Haskell Fire Department
8. Saline Memorial Hospital
9. Saline Memorial Ambulance Service
10. Family Practice Associates (Company Physician)
11. Baptist Medical Center

Revised 8-03-01

## Appendix E

### Written Agreements With Authorities

The following letters will be signed prior to Building #200 being placed into use.



**RINECO**

*The Environmental Solution*

819 Vulcan Road • P.O. Box 729  
Benton, Arkansas 72018 • 800-377-4692  
[recycle@rineco.com](mailto:recycle@rineco.com)

November 9, 1998

Mr. Roger Feldt  
Administrator  
Saline Memorial Hospital  
#1 Medical Park Drive  
Benton, AR 72015

RE: Rineco Contingency Plan

Dear Mr. Feldt:

According to 40 CFR 264.53, Rineco is to provide a copy of our Contingency Plan to any emergency response team(s) that may provide assistance in the event of an emergency. This is to certify that you have received a copy of the August 11, 1998 updated plan.

If you have any questions or comments, please feel free to contact me at (501) 778-6325, X232.

Sincerely,

Larry D. Williams, Ph.D., REM, CHMM  
Director,  
Environmental & Regulatory Compliance

LDW/lt

Received by:

Roger Feldt  
Administrator, Saline Memorial Hospital

11/9/98  
Date





**RINECO**

*The Environmental Solution*

November 9, 1998

819 Vulcan Road • P.O. Box 729  
Benton, Arkansas 72018 • 800-377-4692  
recycle@rineco.com

Sheriff Judy Prigden  
Saline County  
200 N. Main, Suite 1  
Benton, AR 72015

RE: Rineco Contingency Plan

Dear Sheriff Prigden:

According to 40 CFR 264.53, Rineco is to provide a copy of our Contingency Plan to any emergency response team(s) that may provide assistance in the event of an emergency. This is to certify that you have received a copy of the August 11, 1998 updated plan.

If you have any questions or comments, please feel free to contact me at (501) 778-6325, X232.

Sincerely,

Larry D. Williams, Ph.D., REM, CHMM  
Director,  
Environmental & Regulatory Compliance

LDW/lt

Received by:

\_\_\_\_\_  
Judy Prigden  
Sheriff, Saline County

11-9-98  
\_\_\_\_\_  
Date



**RINECO**

*The Environmental Solution*

November 9, 1998

819 Vulcan Road • P.O. Box 729  
Benton, Arkansas 72018 • 800-377-4692  
[recycle@rineco.com](mailto:recycle@rineco.com)

Mr. Don Bennett  
Director  
Office of Emergency Services  
102 South Main, Level B  
Benton, AR 72015

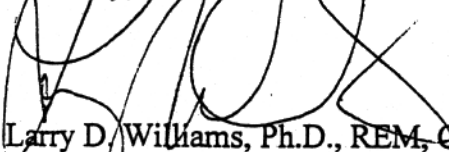
RE: Rineco Contingency Plan

Dear Mr. Bennett:

According to 40 CFR 264.53, Rineco is to provide a copy of our Contingency Plan to any emergency response team(s) that may provide assistance in the event of an emergency. This is to certify that you have received a copy of the August 11, 1998 updated plan.

If you have any questions or comments, please feel free to contact me at (501) 778-6325, X232.

Sincerely,



Larry D. Williams, Ph.D., REM, CHMM  
Director,

Environmental & Regulatory Compliance

LDW/lt

Received by:

Donald L. Bennett  
Don Bennett  
Director, Office of Emergency Services  
By: Jillie Palmer D.C.

11-9-98  
Date







**RINECO**

*The Environmental Solution*

819 Vulcan Road • P.O. Box 729  
Benton, Arkansas 72018 • 800-377-4692  
[recycle@rineco.com](mailto:recycle@rineco.com)

November 9, 1998

Mr. Ken Youngblood  
Benton Fire Chief  
Benton Fire Department  
220 South Main  
Benton, AR 72015

RE: Rineco Contingency Plan

Dear Mr. Youngblood:

According to 40 CFR 264.53, Rineco is to provide a copy of our Contingency Plan to any emergency response team(s) that may provide assistance in the event of an emergency. This is to certify that you have received a copy of the August 11, 1998 updated plan.

If you have any questions or comments, please feel free to contact me at (501) 778-6325, X232.

Sincerely,

Larry D. Williams, Ph.D., REM, CHMM  
Director,  
Environmental & Regulatory Compliance

LDW/lt

Received by:

Ken Youngblood  
Benton Fire Chief

11-9-98  
Date



**RINECO**

*The Environmental Solution*

November 9, 1998

819 Vulcan Road • P.O. Box 729  
Benton, Arkansas 72018 • 800-377-4692  
[recycle@rineco.com](mailto:recycle@rineco.com)

Haskell Fire Department  
c/o Roy Carman  
2520 Highway 229  
Benton, AR 72015

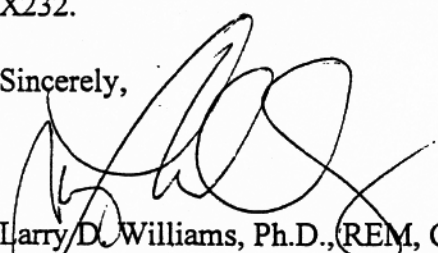
RE: Rineco Contingency Plan

Dear Mr. Carman :

According to 40 CFR 264.53, Rineco is to provide a copy of our Contingency Plan to any emergency response team(s) that may provide assistance in the event of an emergency. This is to certify that you have received a copy of the August 11, 1998 updated plan.

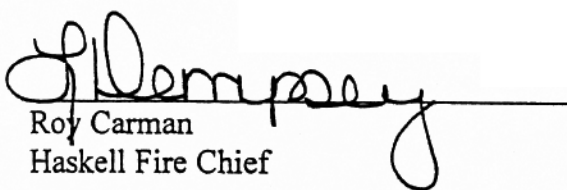
If you have any questions or comments, please feel free to contact me at (501) 778-6325, X232.

Sincerely,

  
Larry D. Williams, Ph.D., REM, CHMM  
Director,  
Environmental & Regulatory Compliance

LDW/lt

Received by:

  
Roy Carman  
Haskell Fire Chief

11/9/98  
Date



**RINECO**

*The Environmental Solution*

November 9, 1998

819 Vulcan Road • P.O. Box 729  
Benton, Arkansas 72018 • 800-377-4692  
[recycle@rineco.com](mailto:recycle@rineco.com)

Mr. Tommy Johnson  
Haskell Police Chief  
Haskell Police Department  
223 Cardinal Drive - Haskell  
Benton, AR 72015

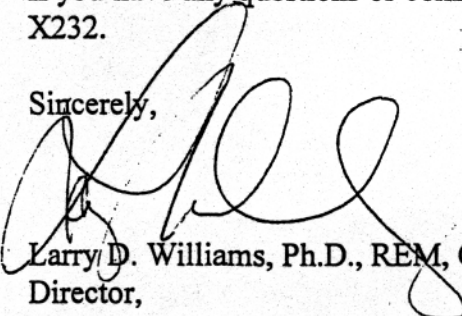
RE: Rineco Contingency Plan

Dear Mr. Johnson:

According to 40 CFR 264.53, Rineco is to provide a copy of our Contingency Plan to any emergency response team(s) that may provide assistance in the event of an emergency. This is to certify that you have received a copy of the August 11, 1998 updated plan.

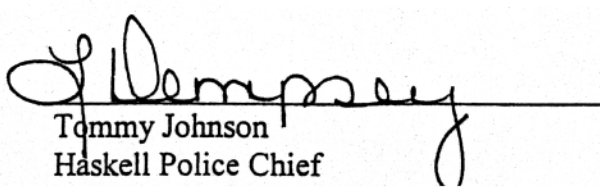
If you have any questions or comments, please feel free to contact me at (501) 778-6325, X232.

Sincerely,

  
Larry D. Williams, Ph.D., REM, CHMM  
Director,  
Environmental & Regulatory Compliance

LDW/lt

Received by:

  
Tommy Johnson  
Haskell Police Chief

11/9/98  
Date





**RINECO**

*The Environmental Solution*

819 Vulcan Road • P.O. Box 729

Benton, Arkansas 72018 • 800-377-4692

[recycle@rineco.com](mailto:recycle@rineco.com)

November 9, 1998

Mayor Billy Quantz  
City Hall  
2520 Hwy. 229  
Benton, AR 72015

RE: Rineco Contingency Plan

Dear Mayor Quantz:

According to 40 CFR 264.53, Rineco is to provide a copy of our Contingency Plan to any emergency response team(s) that may provide assistance in the event of an emergency. This is to certify that you have received a copy of the August 11, 1998 updated plan.

If you have any questions or comments, please feel free to contact me at (501) 778-6325, X232.

Sincerely,

Larry D. Williams, Ph.D., REM, CHMM  
Director,  
Environmental & Regulatory Compliance

LDW/lt

Received by:

\_\_\_\_\_  
Mayor Billy Quantz

11/9/98  
\_\_\_\_\_  
Date



**RINECO**

*The Environmental Solution*

November 9, 1998

819 Vulcan Road • P.O. Box 729  
Benton, Arkansas 72018 • 800-377-4692  
recycle@rineco.com

Dr. Samuel D. Taggart  
Family Practice Associates  
#3 Medical Park Drive  
Main Level, Suite 100  
Benton, AR 72015

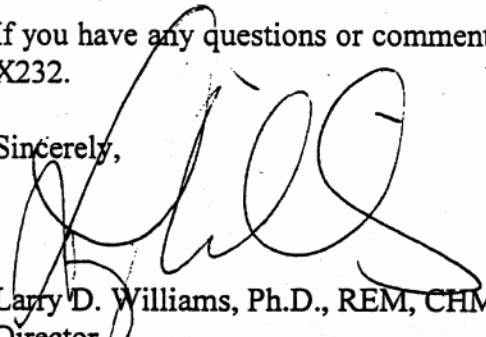
RE: Rineco Contingency Plan

Dear Dr. Taggart:

According to 40 CFR 264.53, Rineco is to provide a copy of our Contingency Plan to any emergency response team(s) that may provide assistance in the event of an emergency. This is to certify that you have received a copy of the August 11, 1998 updated plan.

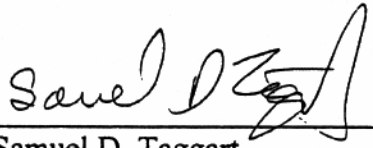
If you have any questions or comments, please feel free to contact me at (501) 778-6325, X232.

Sincerely,

  
Larry D. Williams, Ph.D., REM, CHMM  
Director,  
Environmental & Regulatory Compliance

LDW/lt

Received by:

  
\_\_\_\_\_  
Dr. Samuel D. Taggart  
Family Practice Associates

11-9-98  
\_\_\_\_\_  
Date