



WESTERN CONNECTICUT STATE UNIVERSITY

HAZARDOUS WASTE CONTINGENCY PLAN

PROCEDURE **E-115**

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Please direct any questions or comments about the applicability of this document to Luigi Marcone, WCSU Department of Public Safety

Developed for WCSU by URS Corporation

1.0 PURPOSE

This procedure establishes the Hazardous Waste Contingency Plan for the storage of hazardous wastes at Western Connecticut State University (WCSU). The purpose of the Plan is, as stated in 40 CFR 265.51(a), to “minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.”

2.0 APPLICATION

The provisions of this Plan are to be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Specifically, this Plan addresses emergencies related to hazardous wastes stored at the Central Hazardous Waste Storage Facility at WCSU (referred to as the “Facility”). This plan does not cover 1) hazardous wastes managed as part of satellite accumulation areas; 2) virgin chemicals, such as those stored within laboratories and chemical stock rooms; or 3) radioactive or biomedical wastes.

3.0 AUTHORITY

Title 40 Code of Federal Regulations (CFR) 265.50 through 265.56

[as referenced in 40 CFR 262.34(a)(4)]

Regulations of Connecticut State Agencies, Section 22a-449(c)-105(1)

[as referenced in 22a-449(c)-102(1)]

(The state regulations incorporate the federal regulations in their entirety, with no additional requirements.)

4.0 FACILITY DESCRIPTION

4.1 Facility Location

The Central Hazardous Waste Storage Facility is located on WCSU’s Midtown campus at:

Higgins Hall
Seventh Avenue
Danbury, CT 06810

The entrance to the Central Hazardous Waste Storage Facility is on the west side of Higgins Hall, beneath the central greenhouse. The Facility is located in a self-contained area of the basement. The surrounding area includes university classrooms, administrative offices, student residence halls, and a student center. A map of the area is included as Figure 1.

4.2 Facility Layout

The Central Hazardous Waste Storage Facility is an 8- by 20-foot room. The room is of masonry construction, with a Class I Division I electrical system. The room contains smoke detection equipment, a sprinkler system, and fire extinguishers. A 5-inch-high masonry berm is located on the inside of the room at the entryway to contain potential spills. Access to the room is restricted. An

emergency telephone is located on the wall just outside the door. The facility layout is shown graphically in Figure 2.

4.3 Facility Operation

The Central Hazardous Waste Storage Facility serves as the location where hazardous wastes are stored prior to being picked up for recycle or disposal by a licensed hazardous waste transporter. Hazardous wastes are generally generated in one of three ways:

1. As part of research activities and teaching experiments in the Chemistry, Biology, Physics, and Astronomy departments
2. As part of teaching and student activities in the Visual Arts departments (i.e., painting, sculpture, ceramics, lithography, and photography studios)
3. As a result of the clean-out of old, expired, and unused chemicals

Typically, hazardous wastes generated in the first two processes described above are accumulated near the point of generation in satellite accumulation areas (SAAs). Once the accumulation containers are full, they are transferred to the Central Hazardous Waste Storage Facility. Old, expired, and unused chemicals are typically transferred directly to the Central Hazardous Waste Storage Facility, once they are declared a waste.

Due to a high number of chemical clean-outs, WCSU is currently classified as Large Quantity Generator (LQG). As such, hazardous wastes may be stored at the Central Hazardous Waste Storage Facility for a maximum of 90 days before being removed for disposal or recycle by a licensed hazardous waste transporter. A Contingency Plan is required for all LQGs of hazardous waste.

Figure 1

WCSU Middtown Campus Hazardous Waste Storage Facility

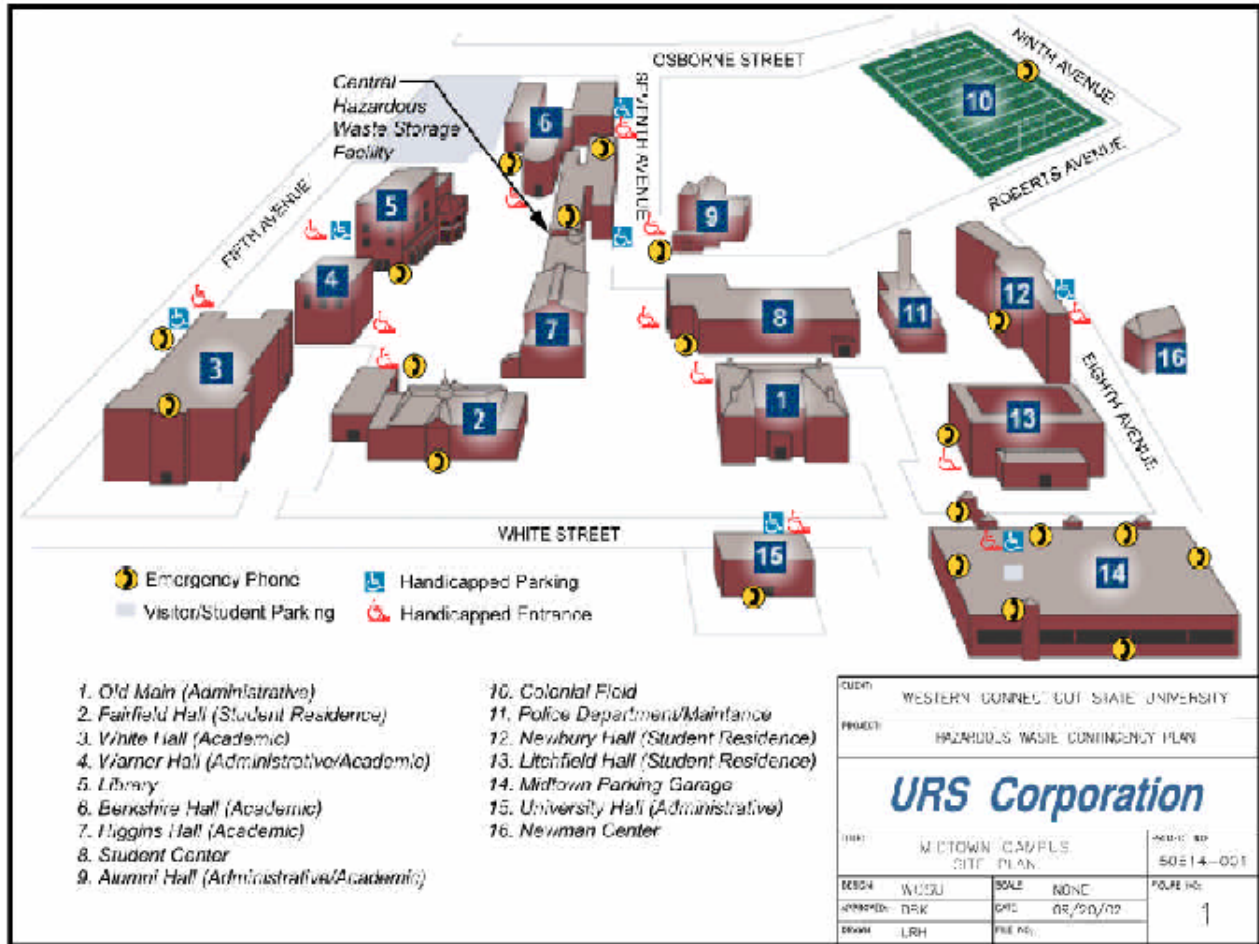
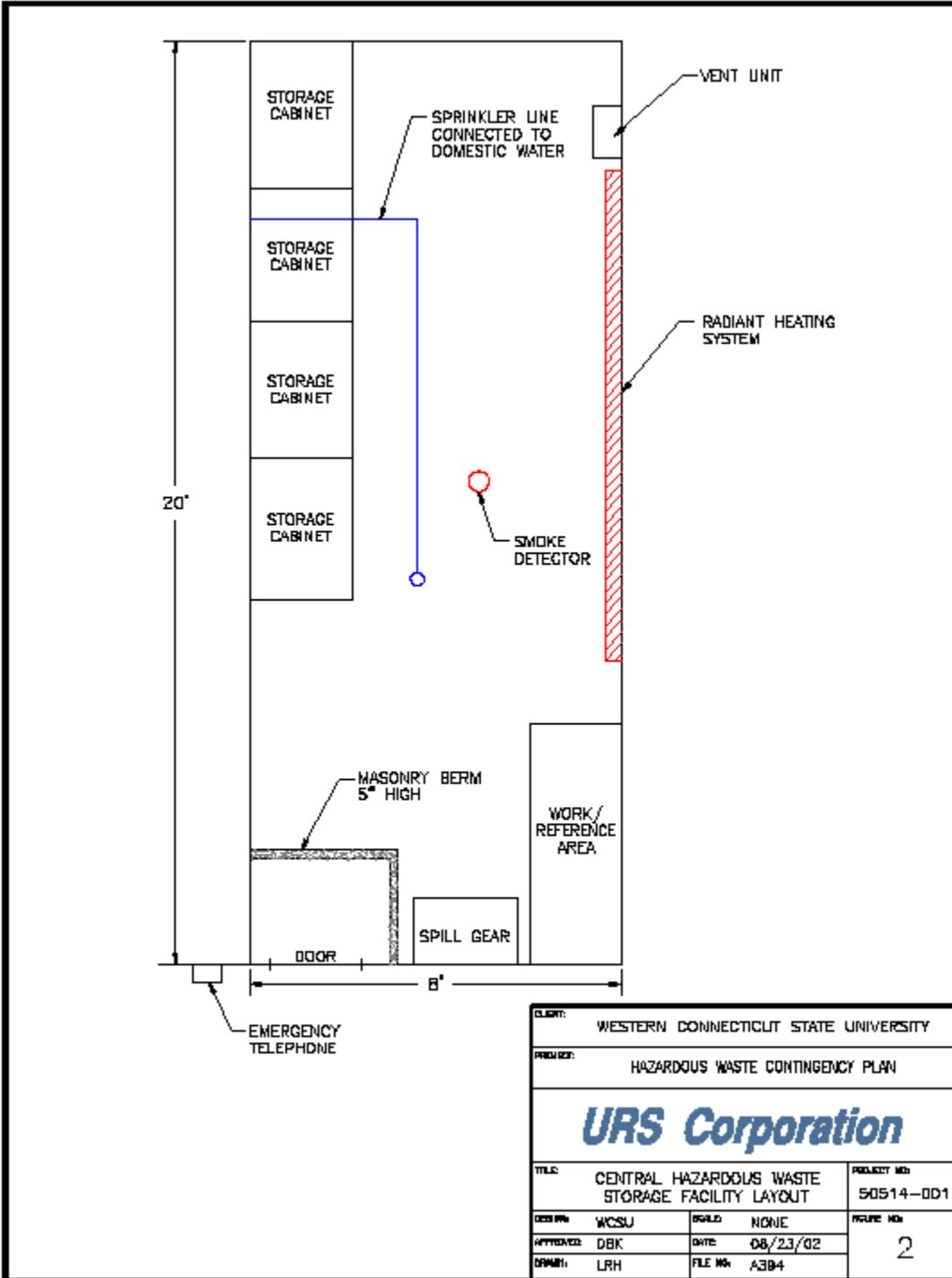


Figure 2

WCSU Middtown Campus Hazardous Waste Storage Facility



5.0 CONTACTS (i.e., EMERGENCY COORDINATOR)

5.1 Identification of the Emergency Coordinator

As required in 40 CFR 265.55, at all times, there is 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. The sole emergency coordinator at WCSU, who meets the qualifications listed below, is:

Luigi Marcone Emergency Coordinator WCSU Director of Health and Public Safety Management	
WCSU – University Hall, Room 214 181 White Street Danbury, CT 06810 Pager (203) 581-7949 Mobile phone (203) 470-8466 Office phone (203) 837-9314	3 High Lake Drive Bethel, CT 06801 (203) 778-8100
Pano Koukopoulos Alternate Emergency Coordinator WCSU Health, Safety, and Environmental Affairs Specialist	
WCSU Old Main, Room 014 181 White Street Danbury, CT 06810 Pager (203) 224-7032 Office phone (203) 837-9352	190 Great Hollow Road Woodbury, CT 06798 (203) 263-7149

The implementation of this Plan in the event of an emergency is the responsibility of the emergency coordinator. This emergency coordinator is thoroughly familiar with all aspects of the Facility's Contingency Plan, all operations and activities at the Facility, the location and characteristic of waste handled, the location of records within the Facility, and the Facility layout. In addition, this person has the authority to commit the resources needed to carry out the Contingency Plan.

5.2 Roles, Responsibilities, and Other Requirements of the Emergency Coordinator

As stated above, the emergency coordinator is responsible for the implementation of this Plan in the event of an emergency at the Central Hazardous Waste Storage Area. Specific duties once an emergency is identified are described in Section 7.0.

In general, the emergency coordinator is in charge of all initial actions taken in response to an emergency. The emergency coordinator continues in this lead role

until the Danbury Fire Department arrives, as which time he relinquishes control to the Danbury Fire Department's Incident Commander. Once control is relinquished, the emergency coordinator acts as a liaison between the Incident Commander and university personnel.

The emergency coordinator inspects the emergency equipment on a monthly basis (see Section 8.0) to ensure that items are present and operational. The emergency coordinator also reviews this Contingency Plan annually (see Section 10.0) to ensure that it is kept current.

6.0 ARRANGEMENTS WITH LOCAL AUTHORITIES

Under 40 CFR 265.37, a facility must attempt to make the following arrangements, where applicable:

- Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;
- Agreements with state emergency response teams, emergency response contractors, and equipment suppliers; and
- Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

WCSU has attempted to make the abovementioned arrangements with the list of local authorities provided in Section 9.0. Letters were written in 2002, and are maintained on-file at the Environmental Health and Safety Office. Contracts are in place with two firms to provide spill cleanup/emergency response services.

7.0 EMERGENCY PROCEDURES

7.1 Initial Response – Emergency Coordinator

In order to comply with the applicable regulations and minimize the hazards associated with an emergency situation, the emergency coordinator must take the following actions upon discovery of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the Facility:

1. Immediately activate internal Facility alarms or communications systems to notify potentially affected personnel. The alarm communicates directly to University Police dispatch, who in turn dispatch the Danbury Fire Department. Assist in evacuation of affected persons, following the evacuation plan included in Attachment 1.
2. Immediately notify the CTDEP Oil and Chemical Spill Response Division (860-424-3338) and the Danbury Fire Department (911 or 203-796-1555, as

appropriate). It is not necessary to separately notify the SERC or the Danbury LEPC at this time.

3. Immediately identify the character, exact source, amount, and real extent of any released materials. This may be done by observation or review of Facility records/manifests and, if necessary, by chemical analysis.
4. Assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion.
5. If it is determined that human health or the environment *outside* of the Central Hazardous Waste Storage Facility is threatened:
 - a. Immediately notify the Danbury Fire and Police departments if evacuation of local areas may be advisable. Also, be available to help appropriate officials decide whether local areas should be evacuated. If additional evacuation is deemed necessary, evacuation should follow the plan included in Attachment 1.
 - b. Immediately notify the National Response Center (800-424-8802). This notification must include the following information:
 - Name and telephone number of the reporter (i.e., emergency coordinator)
 - Name and address of the Facility
 - Time and type of incident (e.g., release, fire)
 - Name and quantity of material(s) involved, to the extent known;
 - The extent of injuries, if any
 - The possible hazards to human health or the environment outside of the facility

7.2 Continued Response – Emergency Coordinator

During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other areas of the Facility. These measures must include collecting and containing released waste and removing or isolating containers. As stated in Section 5.2, the emergency coordinator continues in the lead role until the Danbury Fire Department arrives, at which time he relinquishes control to the Danbury Fire Department's Incident Commander. Once control is relinquished,

the emergency coordinator acts as a liaison between the Incident Commander and university personnel during the continued emergency response phase.

Within 24 hours of the emergency, the emergency coordinator must complete a written "Report of Petroleum or Chemical Product Discharge, Spillage, Seepage, Filtration" form (Attachment 2) and mail it to CT DEP, the SERC, and the Danbury LEPC.

7.3 Post-Response Actions – Emergency Coordinator

Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil, or surface water, or any other material that results from a release, fire, or explosion at the Facility. It should be noted that this waste should be handled according to applicable hazardous waste requirements. The emergency coordinator must also ensure that no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed. Additionally, he must ensure that all emergency equipment used (see Section 8.0) is cleaned and rendered fit for its intended use.

Once the tasks in the above paragraph are completed, the emergency coordinator must notify the EPA Region I and the CTDEP Administrators that the appropriate measures described above have been taken. After this notification, with the Administrators' approvals, normal operations can resume.

The time, date, and details of any incident that requires the implementation of this Contingency Plan will be noted and maintained with the inspection logs for the Facility. Additionally, within 15 days of the incident, the emergency coordinator will submit a written report on the incident to the EPA Region I and the CT DEP Administrators. The report will include:

- Name, address, and telephone number of the owner or operator;
- Name, address, and telephone number of the facility;
- Date, time, and type of incident (e.g., fire, explosion);
- Name and quantity of material(s) involved;
- The extent of injuries, if any;
- An assessment of actual or potential hazards to human health or the environment, if applicable; and
- Estimated quantity and disposition of recovered material that resulted from the incident.

8.0 EMERGENCY EQUIPMENT

A list of all emergency equipment at the Facility is included as Attachment 3. The list also includes the location and a physical description of each item, along with a brief outline of each item's capabilities. The emergency coordinator or his designee will inspect the presence and condition of emergency equipment on a monthly basis, using the inspection sheet in Attachment 3.

9.0 PLAN DISTRIBUTION

A copy of this Contingency Plan and all revisions to the Plan is maintained at the Central Hazardous Waste Storage Facility and at the Environmental Health and Safety Office. In addition, a copy has been submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. Specifically, this Contingency Plan for the Facility at WCSU has been provided to the following parties:

Danbury Police Department

120 Main Street
Danbury, CT 06810
203-797-4614
Attn: Chief of Police

Danbury Fire Department

19 New Street
Danbury, CT 06810
203-796-1555
Attn: Fire Marshall

Danbury Hospital

24 Hospital Avenue
Danbury, CT 06810
203-797-7000
Attn: Emergency Coordinator

Danbury LEPC

20 West Street
Danbury, CT 06810
203-797-4625
Attn: Jack Kozuchowski

Connecticut SERC

79 Elm Street
Hartford, CT
860-424-3373
Attn: Joe Pulaski

Fleet Environmental Services LLC

(Spill cleanup contractor)
3 Trowbridge Drive
Bethel, CT 06801
203-744-3477
Attn: Doug Brittingham

Environmental Services, Inc.

(Spill cleanup contractor)
9 Brookfield Street
South Windsor, CT 06704
860-528-9500
Attn: Seb Cannata

10.0 PLAN AMENDMENTS AND REVIEW

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

- Applicable regulations are revised;
- The Plan fails in an emergency;
- The emergency coordinator changes, or an alternate emergency coordinator is added;
- The list of emergency equipment changes;

- The Facility changes (in its design, construction, operation, maintenance, or other circumstances) in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents; or
- The Facility changes (in its design, construction, operation, maintenance, or other circumstances) in a way that changes the response necessary in an emergency.

Minor revisions (i.e., affecting only a few pages) will be indicated by a letter after the revision number (e.g., Revision 1a), accompanied by the date of the revision. Major revisions will be assigned the next sequential revision number (e.g., Revision 2), accompanied by the date of the revision. Amendments will be distributed to all parties listed in Section 9.0 of this Plan. In the case of minor revisions, only affected pages (with instructions on how to replace the revised sections) will be sent. All amendments will be mailed with a transmittal form letter (Attachment 4), requesting a return response to indicate receipt of the amendments.

In order to ensure that this Contingency Plan is amended as necessary, the Plan will be reviewed annually by the emergency coordinator. The annual review will be documented on a checklist (Attachment 5) and kept on-file as documentation. Any required revisions identified will be made and distributed as described above.

**ATTACHMENT 1
EVACUATION PLAN**

ATTACHMENT 2
CT DEP'S "REPORT OF PETROLEUM OR CHEMICAL PRODUCT DISCHARGE,
SPILLAGE, SEEPAGE, FILTRATION" FORM
(i.e., SPILL REPORT FORM)

ATTACHMENT 3
LIST OF EMERGENCY EQUIPMENT AT OR NEAR THE CENTRAL HAZARDOUS
WASTE STORAGE FACILITY

List of Emergency Equipment at or Near the Central Hazardous Waste Facility

Date _____ Inspector _____

Time _____ Signature _____

(Describe any inadequate or missing items in "notes" section below)

Item	Quantity	Physical Description / Capabilities	Location	Acceptable Condition	Unacceptable Condition
Chemical sorbent pads	1 roll	Absorb up to 31 gallons of spilled liquid	CHWSF		
Loose sorbent	1 bag	Absorb up to 20 gallons of spilled liquid	CHWSF		
Disposable shovel	1 each	For use in distributing and collecting loose sorbent	CHWSF		
Disposable nitrile gloves	2 boxes	Protect workers during waste handling and/or spill response	CHWSF		
Tyvek suits (with hood and boots)	1 case	Protect workers during waste handling and/or spill response	CHWSF		
Safety goggles	2 each	Protect workers during waste handling and/or spill response	CHWSF		
Mercury absorb jars	2 each	For use in case of mercury spill	CHWSF		
Polyethylene pail	1 each	Hold up to five gallons; for use as emergency secondary containment, or to collect sorbent material	CHWSF		
Fire extinguisher	1 each	10 lb Dry chemical ABC type	CHWSF		
Communications system	1 each	Call box/Direct connection to WCSU PD	CHWSF		
Spill control kit	1 each	Holds spill response supplies	HA Basement		
Spill control kit	1 each	Holds spill response supplies	HA 1 st floor		
Spill control kit	1 each	Holds spill response supplies	HA 2 nd floor		

Notes: _____

CHWSF – Central Hazardous Waste Storage Facility
 HEPA – High efficiency particulate air
 PID – Photoionization detector

Notes:

ATTACHMENT 4
TRANSMITTAL LETTER FOR CONTINGENCY PLAN REVISIONS
(Note: To be sent to those parties listed in Section 9.0 of the Plan)

To: _____

From: Luigi Marcone
Emergency Coordinator
Western Connecticut State University
Danbury, CT 06810

Re: Revision to Western Connecticut State University's (WCSU) Contingency Plan (for the Central Hazardous Waste Storage Facility)

Date: _____

_____ Please insert into your copy of the WCSU Contingency Plan the enclosed page(s), marked Revision ____, and remove and discard the pages they replace.

_____ Please discard your entire copy of the Contingency Plan, and replace it with Revision ____ enclosed.

Please sign the receipt below and return it to us to indicate you have received the material. Thank you. Please contact me at 203-837-9314 if you have any questions.

To: Luigi Marcone
Emergency Coordinator
Western Connecticut State University
Danbury, CT 06810

From: _____

I have received your transmittal number _____, dated _____, providing revisions to the WCSU Contingency Plan.

Print Name

Signature

Date

ATTACHMENT 5
ANNUAL CONTINGENCY PLAN REVIEW CHECKLIST

ANNUAL CONTINGENCY PLAN REVIEW CHECKLIST

Date of this review: _____

Reviewer: _____ (print) _____ (signature)

CRITERIA (i.e., did any of these occur in the past year?)	Yes	No
1. Regulations governing the scope and extent of this Plan were revised.		
2. The Plan failed in an emergency.		
3. The emergency coordinator changed. <i>(This includes address and phone changes, as well as changes in personnel or the addition of an alternate emergency coordinator.)</i>		
4. The list of emergency equipment changed.		
5. The facility changed (in its design, construction, operation, maintenance, or other circumstances) in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents.		
6. The facility changed (in its design, construction, operation, maintenance, or other circumstances) in a way that changes the response necessary in an emergency.		

SUMMARY:

_____ There have been no changes since the last Contingency Plan review.

_____ Changes have occurred, and the Contingency Plan must be modified as follows:
