Romic Environmental Technologies Corp.

AZD 009015389

Chandler, Arizona

TSD Facility

Section G

Contingency Plan

January 2005

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G HAZARDOUS WASTE CONTINGENCY PLAN AS REQUIRED BY 40 CFR 264.50-56

G1 PURPOSE AND IMPLEMENTATION OF CONTINGENCY PLAN

The purpose of the Contingency Plan is to minimize hazards to human health or the environment from fire, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. The provisions of the plan are 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. Copies of the Contingency Plan are located in the facility's Emergency Response Manual located at the reception areas of the west and east sides of the facility. Transmittal letters for submitting the Contingency Plan to response agencies are located in Appendix G-2.

Responses to incidental releases of hazardous materials or hazardous waste where the material can be contained, pumped, absorbed, neutralized or otherwise controlled at the time of release by employees in the release area are not considered to be emergency responses and do not activate the Contingency Plan. Table G-3, Emergency Response Categories, gives recommendations to the levels of emergency response for various categories of emergencies and is a guidance tool for use by the Emergency Coordinator for determining when off-site assistance and/or evacuation is required

Romic is designed and operated to minimize the possibility of a spill, fire, or explosion. However, if it should ever become necessary to implement the Contingency Plan, personnel are trained to act immediately. The Contingency Plan is designed to minimize hazards to human health and the environment from fires, explosions, or any sudden or non-sudden release of hazardous wastes, hazardous waste constituents or hazardous materials to the air, soil, or surface water.

G2 ARRANGEMENTS WITH LOCAL AUTHORITIES

Romic is located on Indian land within the Gila River Indian Reservation, and is required to contact Gila River Emergency Services dispatch at 9-911 to obtain and coordinate the services of the fire and police departments, Hazmat team, paramedics and ambulance that would respond to an incident at the facility. These arrangements are described in Section F. Memoranda of Agreement with local agencies are provided in Appendix G-2 and F-3.

G3 CONTENT OF CONTINGENCY PLAN

In accordance with §§ 264 Subpart D, and 270.14(b)(7), the contingency plan must include specific information concerning the following:

- Actions facility personnel take to comply with §264.51 and §264.56 in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

- Spill Prevention, Control, and Countermeasures (SPCC) Plan. This facility does not have a SPCC Plan; therefore, it is not incorporated into this plan.

- Response agreements with outside emergency response agencies (refer to Section F and Appendix F-3 and G-2).

- List of persons qualified to act as emergency coordinator and relevant information (listed in Table G-1).

- List of emergency response equipment including type, location, physical description, and capabilities of the equipment (listed in Table G-2). The location of key equipment is provided in Figure G-3.

Copies of the Contingency Plan and all reference materials will be maintained at the facility.

G4 EVACUATION PLAN

In the event that there is an emergency situation in which the Emergency Coordinator determines that employees should evacuate the premises, the following plan provides the process for notifiying employees the need to evacuate, evacuation routes, and alternate evacuation routes should the main route be blocked by a releases of hazardous waste. Primary and secondary evacuation routes are detailed on Figures G-1 and G-2.

G4.1 SIGNALS

The primary signal to evacuate the hazardous waste facility is by air horn. A continuous blast from any air horm is the signal to evacuate to the designated evacuation staging area (Figures G1 and G2).

The secondary signal to evacuate is by hand-held radios. Supervisors, department managers, and emergency coordinators carry 2-way radios to communicate for operational or emergency purposes. The primary emergency coordinator, or one of the designated alternate emergency coordinators, gives the command to evacuate in accordance with the nature of the emergency situation.

The tertiary signal to evacuate a specific area are short bursts from the air horn.

G4.2 EVACUATION ROUTES

The facility is divided by a rail road spur into two areas, the west, or hazardous waste operations and storage area, and the east, or administrative and trucking area. In the event of an evacuation from the waste storage area, the evacuation staging area is in the parking lot.

G4.3 EVACUATION PROCEDURES

The type of incident determines which of the following evacuation procedures are utilized.

- Spill or Fire with NO Imminent Danger – Evacuation of immediate area only

  Supervisor and/or Emergency Coordinator ensure all unnecessary personnel are out of the immediate area. Area personnel, properly protected and equipped, may enter the area to control and mitigate the situation.

- Spill with Potential/Imminent Danger – Evacuation of immediate area and alert to surrounding areas

  Supervisor and/or Emergency Coordinator ensure all unnecessary personnel are out of the immediate area. Area to be roped, barricaded, or otherwise secured by personnel to prevent entry of uninvolved personnel. Area personnel, properly protected and equipped, may enter the area to control and mitigate the situation.

- Fire with Potential/Imminent Danger – Evacuation of immediate and surrounding areas

  Supervisor and/or Emergency Coordinator ensure all unnecessary personnel are out of the immediate area. Area to be roped, barricaded, or otherwise secured by personnel to prevent entry of uninvolved personnel while awaiting fire department arrival.

G4.4 EVACUATION ASSEMBLY AREAS

All non-emergency (untrained or undesignated by emergency coordinator) personnel will immediately heed the evacuation signal by proceeding to one of following predesignated evacuation assembly areas. See Figures G1 and G2 for evacuation routes and assembly areas.

Once at an evacuation assembly area, personnel will await further instructions from the Evacuation Coordinator(s) (see below).

G4.5 PERSONNEL ACCOUNTABILITY

Once assembled at the evacuation assembly area, the Emergency Coordinator will designate an Evacuation Coordinator(s) who will take a head count and communicate either directly or via radio with the Emergency Coordinator. Current personnel lists are maintained by the facility Human Resources Department.

A copy of the current list is maintained in the Emergency Document Tube at the West Pedestrian Gate.

Laboratory personnel, or the Manifest Coordinator in this order are responsible for taking the guest book to the evacuation area in order to account for visitors to the operational (west) side of the facility. The

Human Resources Department performs these same duties for the east (Administrative) side of the facility.

G4.6 EVACUATION OF THE FACILITY

If necessary, evacuation of the facility will proceed through the west side front entrance gate (Gate 1), the west side front exit gate (Gate 2), or through the Building 2 exit onto W. Allison Road, and through either appropriate gate from the east side of the property. Depending upon wind direction, the evacuation will proceed either east or west on W. Allison Road to a safe distance to be determined by the Emergency Coordinator. Once there, all personnel will await further instructions from the Evacuation Coordinator.

G4.7 EVACUATION OF OFFSITE AREAS

Evacuation of offsite areas is highly unlikely. However, any decision to evacuate offsite areas will be made by the responding agencies Incident Commander and the evacuation will be the responsibility of local (tribal) law enforcement.

G5 EMERGENCY COORDINATOR

The key person responsible for coordinating all emergency response measures in implementing the Contingency Plan is the Emergency Coordinator (EC). The emphasis on immediate response to hazard conditions requires the Emergency Coordinator be free to use his/her judgment in an emergency. Therefore, the Emergency Coordinator has the authority to commit all necessary resources in the event of an emergency.

G5.1 EMERGENCY COORDINATOR DUTIES

The Emergency Coordinator will comply with the requirements of 40 CFR Part 264.56 whenever there is an imminent or actual emergency according to the following guidelines:

- Alert all facility personnel and oversee all actions taken by plant personnel to deal with the emergency.
- Within fifteen minutes of an incident resulting in an imminent or actual emergency situation requiring activation of the Contingency Plan, notify appropriate tribal response agencies via the 911 telephone network, and federal authorities by telephone as required.
- Determine the extent of the emergency and dedicate the resources needed to remedy the situation.
    - Note if a fire is involved or potential for one exists. The Emergency Coordinator or his designee will call 9-911 immediately for fire department assistance in the event of a fire, explosion or generation of toxic, irritating or asphyxiating gasses that may be generated in sufficient quantity to leave the site.

- Note the exact location of the incident. The location within a process, tank or storage area may be sufficient to determine the materials involved.

- Note any injuries requiring medical attention and arrange for care of the injured.

- Determine the character and quantity of involvement.

- Attempt to identify materials involved via labels, placards, bills of lading, manifests, production control papers, profiles, etc.

- Determine if any tribal response agency help is necessary (see above) and arrange for assistance by calling 9-911. During the hours of 8:00 a.m.-5:00 p.m., this can be done by notifying the onsite operator via radio to call 9-911, or dialing 9-911 from any in-plant phone. Gila River Emergency Services include the Fire Department, HazMat Team, Police, Paramedics, Ambulance, Tribal Emergency Response Commission, and Department of Environmental Quality. Gila River Emergency Services can obtain additional assistance from the greater Phoenix area emergency response agencies.

- Evaluate situation to determine if evacuation of the plant is necessary. Evacuations are discussed in Section G4. Evacuation signals are described in Section G4.1, evacuation routes are discussed in Section G4.2, evacuation procedures, including partial or full evacuations, are discussed in Section G4.3, evacuation to off-property is discussed in Section G4.6, and evacuation of the surrounding area is discussed in Section G4.7. Sheltering in place is also an option in an emergency situation not involving a fire or explosion.

- If an airborne release is involved, the Emergency Coordinator determines wind direction and directs all personnel upwind of the release, or to shelter in place if appropriate. Wind direction can be determined by looking at the flags located in front of the office building and the wind socks on the distillation column and overhead pipe rack at the south end of the facility.

- Assist response agency Incident Commander in evaluating the situation to determine if evacuation of surrounding areas is necessary.

- Direct efforts of internal response and/or act as a liaison with the outside response agency if one is summoned.

- Whenever there is a release, fire, or explosion immediately identify the character, exact source, amount and extent of any released materials and make an assessment about direct and indirect effects of the emergency and necessary remedial action to prevent further deterioration of the situation. Air evaluations may be based upon computer dispersion modeling and ground and/or water evaluations (although they should be unnecessary because of site containment provisions).

- If it is assessed that the emergency could threaten human health or the environment offsite, report it as follows:
  - Notify local (tribal) authorities immediately (no longer than 15 minutes) and call the National Response Center (1-800-424-8802). The report must include:
    - Full name and phone number of the reporter.
    - Name and address of the facility.
    - Time and type of incident.
    - Name and quantity of materials involved.
    - Injuries, if any.
    - The possible hazards to health and the environment outside the facility.
  - If it is assessed that evacuation of local areas may be advisable, call (9-911) and notify appropriate local (tribal) authorities, and assist the authorities in deciding whether local evacuation is necessary. In certain instances, such as gas clouds that may quickly dissipate within a short distance from the facility, sheltering in place may be recommended rather than evacuation.
- During the emergency, take all reasonable precautions to insure that additional fires, explosions or releases do not arise or occur or spread to other areas in the facility. This can be done by stopping distillation processes, collecting, containing and removing released waste, and removing or isolating containers.
- If the facility stops process operations in response to a fire, explosion or release, the Emergency Coordinator must monitor for leaks, pressure buildup, gas generation, and ruptures where appropriate. Romic's distillation processes operate under vacuum or at atmospheric pressure and cannot generate vapors without a steam supply. The operation is shut down by terminating the steam supply and turning off pumps. The vent system is open to the atmosphere through the carbon beds. The distillation processes are all batch, with manual feed. There is no danger of overfill during an emergency because fills are done prior to starting the distillation processes. Therefore, it is unlikely that there would be be leaks, pressure buildup, gas generation or ruptures in the system. The distillation units can be monitored by facility personnel if it is safe to enter the distillation area during an emergency.

- Follow-up Procedures after an emergency:
  - Ensure that all emergency equipment is cleaned and fit for use before operations are resumed. A list of personal protective equipment (PPE) is provided in Table G-5.
  - Determine that the facility is in full readiness to resume normal operations prior to restart.
  - Handle waste material involved in the emergency as follows:
    - Return recovered waste to normal operations for recycling, supplementary fuel, destructive incineration, and/or water treatment.
    - Place contaminated soil in open-head drums or other appropriate containers for disposal as permitted by regulations.
    - Collect contaminated surface water, if any, in drums or other appropriate containers for disposal or treatment as permitted by regulations.
    - Before operations resume, notify the Regional Administrator and the Gila River Department of Environmental Quality that no released material is incompatible with the wastes stored or processed in the area or that cleanup has been completed; and that all emergency equipment listed in the contingency plan has been cleaned and is fit for its intended use.
- Submit report to EPA Regional Administrator and the Gila River Department of Environmental Quality within 15 days of the incident. The report must include:
  - Name, address and telephone number of the owner/operator.
  - Name, address and telephone number of the facility.
  - Date, time 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 environemt, where this is applicable.
  - Estimated quantity and disposition of recovered material that resulted from the incident.
- Ensure the facility has, at a minimum, equipment required by 40 CFR 264.32. An emergency equipment list is located in Table G-2.

G5.2 QUALIFICATIONS AND TRAINING OF EMERGENCY COORDINATORS

G5.2.1 REQUIRED QUALIFICATIONS

An Emergency Coordinator must be thoroughly familiar with the following:

- All aspects of the facility's Contingency Plan (trained and tested according to Training Plan).
- All operations and activities at the facility.
- Location and characteristics of waste/chemicals handled.
- Location of all records, especially **current** tracking records, within the facility.
- Facility layout, including utilities.

Frequent inspections and active participation on a regular basis by the Emergency Coordinator maintains his/her familiarity with the aforementioned and minimizes the chance of a major accident.

G5.2.2 ADDITIONAL PREFERRED QUALIFICATIONS

- Personality Traits
  - Leader who can take charge
  - Quick thinker - logical
  - Cool under pressure
  - Dedicated
- In a current leadership role of personnel
- Experience with a response to a fire and/or chemical release
- One year minimum length of employment and or environmental management experience

G5.2.3 TRAINING

Romic's philosophy is to train a variety of personnel to ensure enough qualified individuals are available to respond to an emergency. Shift Supervisors/Leaders and Process Management Personnel will receive at least RCRA and HAZWOPER refresher training. Emergency Coordinators will receive additional specialized training according to the Training Plan.

G5.3 AVAILABILITY OF EMERGENCY COORDINATORS

An Emergency Coordinator always will be available to facility personnel. The designated primary and alternate emergency coordinators will coordinate their schedules (business trips, vacations, holidays, etc.) so that at least one qualified emergency coordinator will be able to respond to the site quickly.

G5.3.1 PRIMARY AND ALTERNATE EMERGENCY COORDINATORS

Romic Environmental Technologies, Inc. Primary and Alternate Emergency Coordinators are designated in the following sequence:

Primary Emergency Coordinator

Mike Therrien	Office: (520) 796-1040
6563 W. Ivanhoe Ct.	Home: (480) 753-1442
Chandler, AZ 85226	Cell: (602) 478-3947

Alternate Emergency Coordinators

Ashok Jain	Office: (520) 796-1040
1601 W. Corona Drive	Home: (480) 899-4038
Chandler, AZ 85224	Cell: (480) 540-2131
Martin Keller	Office: (520) 796-1040
13454 N. 88th Place	Home: (480) 314-2572
Scottsdale, AZ 85260	Cell: (602) 361-2972
Micki Schultz	Office: (520) 796-6250
4186 W Corona Drive	Home: (480) 730-1749
Chandler, AZ 85226	Cell: (480) 797-1607

G6.0 EMERGENCY RESPONSE TEAM STRUCTURE

Romic does not have an official emergency response team, but all operations and field services personnel are trained to respond to spills and releases as part of their normal training. If an emergency occurs while a designated emergency coordinator is not at the facility, immediate notification (by phone or 2-way radio) will be made to all emergency coordinators to respond to the facility. The senior management individual on site at the time will act as the interim Emergency Coordinator. This person's primary objective is the safety of personnel on site. This person will direct all available personnel as to actions to be taken and will assist any outside emergency personnel. This senior management individual will remain the acting emergency coordinator until relieved by a designated emergency coordinator or a better-qualified person.

The emergency coordinator (EC) will immediately try to establish the most effective Incident Command Structure (ICS) for response based on factors such as the nature/type of emergency, the location of emergency, and the number of qualified responders present. The ICS will use a manageable span of 3-7 persons reporting to one individual (whether an EC or team leader). Additionally, Romic's teams will parallel External Incident Command Structure (Fire Department/Outside Teams) as much as possible. Romic's Primary EC will be directed by the Overall Incident Commander once outside emergency services are established at the site.

Communication between the Primary Emergency Coordinator and Response Team Leaders will be by portable radio while communication between the Response Team Leaders and their teams will be verbal or by portable radio.

G7 EMERGENCY RESPONSE CATEGORIES

G7.1 SPILL OR MATERIAL RELEASE

In the case of a spill or material release, the Contingency Plan will be implemented when any of the following events occur:

- The spill could cause the release of hazardous liquids and/or vapors which could threaten human health or the environment outside the facility.
- A contained spill threatens contamination of groundwater or surface water.
- The spill cannot be contained.

G7.2 FIRE OR EXPLOSION

In the case of fire or explosion, the Contingency Plan will be implemented when any of the following events occur:

- Fire or explosion causes the release of toxic gases and vapors which may affect the surrounding area.
- Fire could spread offsite.
- Use of water and/or chemical fire suppressant could result in contaminated runoff or discharges to waters of the United States.
- An imminent danger exists that an explosion could occur, causing flying fragments or shock waves.
- An imminent danger exists that an explosion could ignite other waste materials at the facility.
- An imminent danger exists that an explosion could result in release of toxic materials affecting the surrounding area.

For a breakdown of types/categories of emergency responses levels, see Table G-3. Based upon this breakdown, tables G-4, Notification Requirements, and G-5, Personal Protective Equipment, will be used as a guide in responding to such events at this facility.

G7.3 CONTINGENCY PLAN – CHEMICAL SPILL

Spills or releases of material are not expected to occur; however, spills could occur due to rupture of hoses, or hose fittings, or leaking containers. Secondary spill containment is, therefore, essential, and the facility operations take place on concrete surfaces with secondary containment capabilities. Spills will be contained on concrete surfaces until personnel can respond with appropriate pumps, absorbent, neutralizing agent, etc. Spill clean up kits are placed in working areas throughout the site. Should a release occur during a tank truck transfer, the operator will immediately close the appropriate valve to shut down the flow of material from the vehicle, and contain the spill with the absorbent materials in the spill kits.

G7.3.1 Leaking Containers

Leaking containers, or containers in poor condition, may be managed by placing the entire container into an overpack container. Spill or leak residues may be cleaned up with absorbent from the spill kits. Contents of a container in poor condition may also be repackaged into another container of similar type, or consolidated in a larger container with materials of the same type. If the container is too large to overpack, such as a tote, the contents may be pumped into another tote, tank or tanker truck.

G7.3.2 Leaking Tanks

If a tank leak is discovered through an inspection (see Section F for inspection information) or other means, the tank will immediately be taken out of service. No additional material may be placed into the

tank until repairs are made. Within 24 hours after detection of the leak, as much of the waste as necessary to prevent further release of hazardous waste must be removed to allow inspection and repair of the tank. The contents of a leaking tank may be pumped into another tank or tanker truck(s) until repairs can be made on the tank. Any pumpable liquid resulting from a tank leak may be pumped from the tank secondary containment area into the same reveiving tank as the tank contents, or a tanker truck, within 24 hours, or in as timely a manner as possible, of discovery. Any required notification to the Regional Administrator will be made within 24 hours.

G7.3.3 Spill Response Procedures

Note: In addition to RCRA-regulated waste materials, the facility has non-RCRA regulated materials that would not cause the Contingency Plan to be activated in the event of a spill. The following actions, whether or not the Contingency Plan is activated, will be taken in the event of a large spill or leak:

- If an employee discovers a release, he/she will immediately report it to the area supervisor, who reports it to the Emergency Coordinator. This can be done via 2-way radio or phone.
- If possible to do so without personal risk, facility personnel should stop the flow and attempt to determine the cause of the release.
- To determine the nature and extent of the spill, the Emergency Coordinator or his designee will investigate the spill and may check the analytical records and inventory data. He/She will evaluate the hazard potential and assign trained personnel to employ the appropriate emergency response equipment to contain and clean the spill.
- Regulatory agencies and emergency assistance teams will be contacted if necessary by dialing (9-911). Note: In addition to RCRA-regulated waste materials, the facility has non-RCRA regulated materials that would not cause the Contingency Plan to be activated in the event of a spill, and regulatory agencies would not need to be contacted if a spill involved those materials. However, the Gila River Fire Department could be contacted to provide standby support with their HazMat Team or paramedics if the situation warrants it.
- All personnel who are not assigned to cleaning the spill will be excluded from the area.
- All waste shipments will be postponed until the spill has been properly handled.
- Freestanding liquids will be pumped and returned to an available tank, tank truck, or container wherever practical. Once the pumpable liquids have been removed, absorbent materials will be applied. The absorbent materials will be transferred to drums and stored for proper disposal as hazardous or non-hazardous waste, in accordance with the nature of the material spilled.
- Decontaminate area.

- Document spill in an incident report, and report spill to appropriate authorities if required to do so.
- Emergency coordinator will certify that final clean-up has been accomplished.
- Resume normal activities.

G7.4 CONTINGENCY PLAN – FIRE

When the Emergency Coordinator is notified of an emergency situation involving a fire or potential of a fire, he will immediately investigate the event and order the appropriate emergency response. If the incident requires emergency assistance, appropriate local (tribal) agencies will be contacted by dialing 9-911, and federal agencies will be contacted as required.

Employees trained in fire response and prevention will concentrate on preventing the fire from spreading to nearby areas until outside assistance has arrived. Firefighting will not be done at the risk of injury to the employees involved. If the fire is beyond the capabilities of employees (greater than Level 1), the Fire Department will respond, and these trained employees will be on standby to assist as requested.

If a fire should occur, Romic Chemical personnel should immediately perform the following:

- Initial Response
  - **DON'T** enter any area which jeopardizes your safety.
  - Assess the extent and magnitude of the event.
- Fire Fighting Procedure and Notification
  - Immediately notify plant personnel by utilizing internal communication system (airhorn alarms, two way radios, voice, etc.).
  - Plant personnel should immediately call 9-911 from any plant phone and notify Gila River Emergency Services of the emergency by giving the caller's name, location, nature of event, and any injuries. Gila River Emergency Services will dispatch appropriate response agencies.
  - Try to prevent fire from spreading, if it can be done at no personal danger.
  - The Emergency Coordinator should assume his role as described in Section G5.1 and direct the response personnel accordingly.
  - When the Fire Department arrives. Romic personnel will drop back into an advisory mode. The Emergency Coordinator will be the liaison and assist in the determination of evacuation of surrounding areas and also the determination of notifying additional agencies or resources.

- Containment and Clean-up
  - After fire is out, start clean up.
  - Remove all contained water and debris and perform remediation if necessary.
  - All areas affected by the fire and all equipment used will be decontaminated prior to returning to service.
  - The Emergency Coordinator must declare the area satisfactorily decontaminated and the emergency equipment must be returned to its ready position before operation may resume.
- The Emergency Coordinator must document the incident in an incident report and provide notification to appropriate agencies as required.

G7.5 CONTINGENCY PLAN – EXPLOSIONS

The likelihood of an explosion occurring at the facility is small. All areas where flammable liquids are handled are designed with explosion-proof equipment and grounding procedures for solvent transfers are followed to avoid the generation of sparks.

All drums are stored under roofs to prevent pressure build-up due to direct sun. All storage tanks are equipped with appropriate venting to avoid an explosive situation. If, however, conditions develop which cause an explosion, the tanks are designed so that the top will blow off the tank.

If explosions do occur, the Emergency Coordinator will sound the evacuation alarm and initiate a call to 9-911. At no time will any employee attempt to control a situation where explosions are occurring.

G7.6 CONTINGENCY PLAN – EARTHQUAKE

The first jolt will be the worst and will determine if the quake is minor or major. There may be after shocks which will generally be less severe.

<u>Minor Quake</u>

- Immediately leave the production area.
- Stay clear of stacked drums, overhead objects, and glass that can shatter.
- If inside building, then get under something sturdy (e.g. doorway, desk) and evacuate building once ground movement stops.
- Turn off power to operating equipment, and natural gas to the boiler. (See Site Plans)

- Assess damage to buildings and facilities.
- If damage is noted, notify the Emergency Coordinator or his/her designee so that appropriate repairs can be made.
- If no damage is discovered, then restart the plant staying alert to anything unusual.

Major Quake

- Immediately leave the production area.
- Stay clear of stacked drums, overhead objects, and glass that can shatter.
- If inside building, then get under something sturdy (e.g. doorway, desk) and evacuate building once ground movement stops.
- Assemble in open area in front of office buildings.
- Turn off power to operating equipment, and natural gas to the boiler. (See Site Plans)
- Assess damage to buildings and facilities.
- If damage is noted, notify the Emergency Coordinator or his/her designee so that appropriate repairs can be made.
- If no damage is discovered, then restart the plant staying alert to anything unusual.
- In the event of a fire or injuries resulting from the quake, contact Gila River Emergency Services by calling 9-911 from any plant phone. Notify all Emergency Coordinators.
- Should there be a fire, follow the plan outlined under "Fire" but realize that Fire Department may not be able to respond.
- If fire cannot be controlled, evacuate personnel to safe area.
- The Emergency Coordinator will notify, record, and document developments as is reasonably possible.

G8 REPORTING

It is essential to provide timely and accurate information about an emergency to all interested parties. Therefore, communications after an emergency is brought under control should be referred as follows:

- Regulatory to the General Manager or the EHS Manager
- Customers to the Customer Service Representative
- All others to the General Manager or his/her designee.
- Romic employees to the General Manager or his/her designee.

Before operations resume, the Emergency Coordinator is responsible for ensuring notification of the EPA Regional Administrator and the Gila River Department of Environmental Quality that no released material is incompatible with the wastes stored or processed in the area or that the cleanup has been completed; and that all emergency equipment listed in the contingency plan has been cleaned and is fit for its intended use.

The incident shall be reported on a Romic Incident Report form, signed by applicable personnel, and retained on site in the EHS files for a minimum of three years. The forms may then be placed in long-term storage. A copy of this form is provided as Appendix G-1.

Additionally, the Emergency Coordinator is responsible for ensuring the prompt submission (within 15 days of the incident) of a written report to:

Director, Department of Environmental Quality
Gila River Indian Community
P.O. Box 97
Sacaton, AZ 85247

EPCRA Coordinator, Chemical Tribal Emergency Response Committee (CTERC)
Gila River Indian Community
P.O. Box 97
Sacaton, AZ 85247

Regional Administrator
U.S. EPA
Region IX
75 Hawthorne Street
San Francisco, CA 94105

containing the following details of the incident:

- Name, address, and phone number of owner
- Name, address, and phone number of facility
- Date, time, and type of incident
- Name and quantity of materials involved
- Extent of injuries, if any
- Extent of potential hazards to health and environment, if any
- Quantity and disposition of recovered material

TABLES

TABLE G-1
EMERGENCY COORDINATORS, IN ORDER

Primary Emergency Coordinator		
Michael Therrien	6563 W. Ivanhoe Ct Chandler, AZ 85226	Offfice: (520) 796-1040 Home: (480) 753-1442 Cell: (602) 478-3947
Alternate Emergency Coordinators		
Ashok Jain	1601 W. Corona Drive Chandler, AZ 85224	Office: (520) 796-1040 Home: (480) 899-4038
Martin Keller	13454 N. 88th Place Scottsdale, AZ 85260	Office: (520) 796-1040 Home: (480) 314-2572 Cell: (602) 361-2972
Micki Schultz	4186 W. Corona Drive Chandler, AZ 85226	Office: (520) 796-6250 Home: (480) 730-1749 Cell: (480) 797-1607

TABLE G-2
EMERGENCY RESPONSE EQUIPMENT

Equipment	Quantity	Location	Purpose
Internal Communication			
Hand Held Two way Radios	23	Supervisors, Managers and key employees (portable)	Communicate operational information; relay emergency response information
Fire Alarms			
All Sprinkler heads	483	Throughout processing, warehouses, maintenance shops, laboratory.	Alert ADT to notify fire responder call; provide fire suppresion
Alarm Boxes	34		Alert ADT to notify fire responder
Air Horns	12	At each main operational area, including vehicle maintenance	Notify spill response team; signal evacuation.
Telephones	21	Offices; Lab; maintenance shops; process control center	Notify spill response team; EHS; management
External Communication			
Telephones	37	Offices, Lab, maintenance shops, process control center	Notify emergency responders.
Emergency Equipment			
30 lb. Portable fire extinguishers	35	Each structure (warehouse, tank farm, office/lab building, maintenance shops) – throughout facility per UFC codes	For immediate response on same BC type fires; coverage 120 ft^2 (novice) to 300 ft^2 (expert); discharge time: 27 seconds; range: 20-30 ft.
Fire control equipment - AFFF Sprinkler System	1	Main fire pump station	Provide foam up to 800 gallons to sprinklered facility
Twin Agent Fire Control Equipment – AFFF/Dry Chemical (AFFF80/ANSUL PKP)	2	East and west sides of the center tank farm area (C&D)	Provide foam and PKP to rail car area or can be wheeled to wherever it is needed – 300 lbs ea. stream.
Wheeled Fire Extinguisher (ANSUL A 350-C 40A: 240BC)	2	East and west sides of the center tank farm area (C&D)	Covers 480 ft^2 (novice) to 1200 ft^2 (expert); Discharge time: 67 seconds; Range: 30 ft.

Equipment	Quantity	Location	Purpose
Spill Control Equipment			
Absorbent	15	55 gal. drums throughout facility	Contain, absorb, clean up local spills
Open head drums (DOT 1A2)	varies	Throughout the facility, and the new drum storage area	Contain contaminated absorbent.
Brooms, shovels, scoop	varies	Throughout the facility, in operations areas and with spill kits	Work with absorbent to clean up spills
Dikes, berms	18	All tank farms and drum storage areas	Secondary containment.
Emergency Acid Spill Kits (inside 85 gallon salvage drum) Non-sparking tools: Flat nose shovel, push broom, 50 lb bag absorbent, 5-gal bucket w/lid, roll 4 mil. Plastic sheeting, tube-leak plug material, 4 emply 30 gal plastic bags, duct tape, 3-17H drum gasket, tube silicone caulking w/gun, 2 pr chemical gloves, crescent wrench, bung wrench, 2 XL tyvek suits, 2 small and 2 large bung gaskets – Trisure and Reike, 3 lb. can acid neutralizer.	2	One by the East Bay Processing Area and one in warehouse #2	To Control/Collect Acid Spills
Emergency Base Spill Kits (inside 85 gallon salvage drum) Non-sparking tools: Flat nose shovel, push broom, 50 lb bag absorbent, 5-gal bucket w/lid, roll 4 mil. Plastic sheeting, tube-leak plug material, 4 emply 30 gal plastic bags, duct tape, 3-17H drum gasket, tube silicone caulking w/gun, 2 pr chemical gloves, crescent wrench, bung wrench, 2 XL tyvek suits, 2 small and 2 large bung gaskets – Trisure and Reike, 3 lb. can acid neutralizer.	2	One by the East Bay Processing Area and one in warehouse #2	To Control/Collect Base Spills

Equipment	Quantity	Location	Purpose
Emergency Oil/Solvent Spill Kits (inside 85 gallon salvage drum) Non-sparking tools: Flat nose shovel, push broom, 50 lb bag absorbent, 5-gal bucket w/lid, roll 4 mil. Plastic sheeting, tube-leak plug material, 4 emply 30 gal plastic bags, duct tape, 3-17H drum gasket, tube silicone caulking w/gun, 2 pr chemical gloves, crescent wrench, bung wrench, 2 XL tyvek suits, 2 small and 2 large bung gaskets – Trisure and Reike, 3 lb. can acid neutralizer.	2	One in the processing area and one in Building #1	To Control/Collect Oil/Solvent Spills
Decontamination Equipment			
Emergency Eye Wash Shower - Stationary	10	Main lab, blending area (2), west side maintenance shops, east side hazardous waste drum storage, Pad SW maintenance shops	Immediate treatment to flush chemicals from employee's eyes
Emergency Eye Wash - Portable	2	As needed	Immediate treatment to flush chemicals from employee's eyes
Showers	4	Men's change room; women's change room in the cafeteria building	Provide immediate full body flush, or after removing personal protective equipment, to ensure that contaminents are not carried out of facility or remain on employee's body.
Personal Protective Equipment	varies	Safety Gear storage room in cafeteria building; storage unit East side	Equipment to prevent employee contamination by vapors, splashes, spills and dusts: Coveralls, boots, booties, gloves, safety glasses, face shields, hard hats; respirator cartridges. Respirators are individually assigned to qualified employees.

Equipment	Quantity	Location	Purpose
Personnel			
Field Services Department	9	Field Services Department provides emergency response services to offsite customers as well as onsite operations.	Field Service perrsonnel are HAZWOPER trained to contain, control, clean up and decontaminate hazardous waste incidents and in operations at hazardous waste sites. Decontamination stations can be set up and operated by Field Service personnel. (plastic sheeting, tubs, sprayers, etc. as used in a "warm zone" decontamination operation).

TABLE G-3
EMERGENCY RESPONSE CATEGORIES *

CATAGORIES	LEVEL 1	LEVEL 2	LEVEL 3	LEVEL 4
Spill	no imminent danger[1], < 100 gallons, in containment, stable situation	no imminent danger[1], > 100 gallons, in containment, stable situation	potential/imminent danger(out of containment, unstable situation, etc.)	See Note 2
Fire	no imminent danger[3](isolated fire)	potential or imminent danger - any other fire	NA	NA
Injury	near miss, first aid only	stable condition needing offsite medical attention(broken bones)	unstable condition needing immediate offsite medical attention(2^{o} and 3^{o} burns)	death
Natural/Unnatural Accident/Catastrophe	no imminent danger[4](earthquake w/o major damage, heavy rains with available storage)	potential/imminent danger(earthquake w/ major damage, heavy rains with available storage capacity running out, riots, power line down, airplane crash)	NA	NA
Vehicular accident	Onsite	Offsite	NA	NA

*Determine each applicable category and corresponding level. If in doubt as to level, be conservative and choose the higher one.

Notes:

1. Spill Categories 1 and 2 not considered an “Implementation of Contingency Plan” which requires specific reports to regulatory agencies - recorded in operating record.
2. Based upon acceptable wastes and design of facility no offsite threat from a spill is deemed probable.
3. Fire Category 1 not considered an “Implementation of Contingency Plan” which requires specific reports to regulatory agencies; recorded in operatin record.
4. Not considered an "Implementation of Contingency Plan" which requires specific reports to regulatory agencies - recorded in operating record

TABLE G-4
NOTIFICATION REQUIREMENTS*

Categories*	Level 1	Level 2	Level 3	Level 4
Spill[1]	Supervisor, Spill report to EHS Mgr. by end of work shift	Supervisor, EHS Mgr.	Supervisor, EC, EHS Mgr, Call 911.	General Manager, Operations Mgr, Outside Help.
Fire	Supervisor, EC	**Hit a Fire Alarm**, Supervisor, ALL EC, Call 911 for Fire Dept.,		
Injury[2]	Supervisor, Injury report to EHS Mgr. by end of work shift	Supervisor, EHS Mgr.	Supervisor, Call 911 EHS Mgr., General Mgr., Operations Mgr., Family	Supervisor, Call 911 EHS Mgr. General Manager, Operations Mgr., Corporate – Health and Safety Manager (USL), Family
Natural/Unnatural Accident/Catastrophe	Supervisor, EC	Supervisor, ALL EC, Call 911 for Outside Help		
Vehicular accident	Transportation Mgr	TransportationMgr., Operations Mgr., EHS Mgr.		

* Check requirements of each applicable category and corresponding level.

No response/entry should be made until **ALL** members are available for preliminary assessment.

[1]Notify Supervisor of area in which spill occurred.

[2]Notify Supervisor of the injured employee.

Notes: Initial person contacted will make the decision for any additional contact requirements. In the case of Outside Help, be sure to give the site address in addition to the company name.

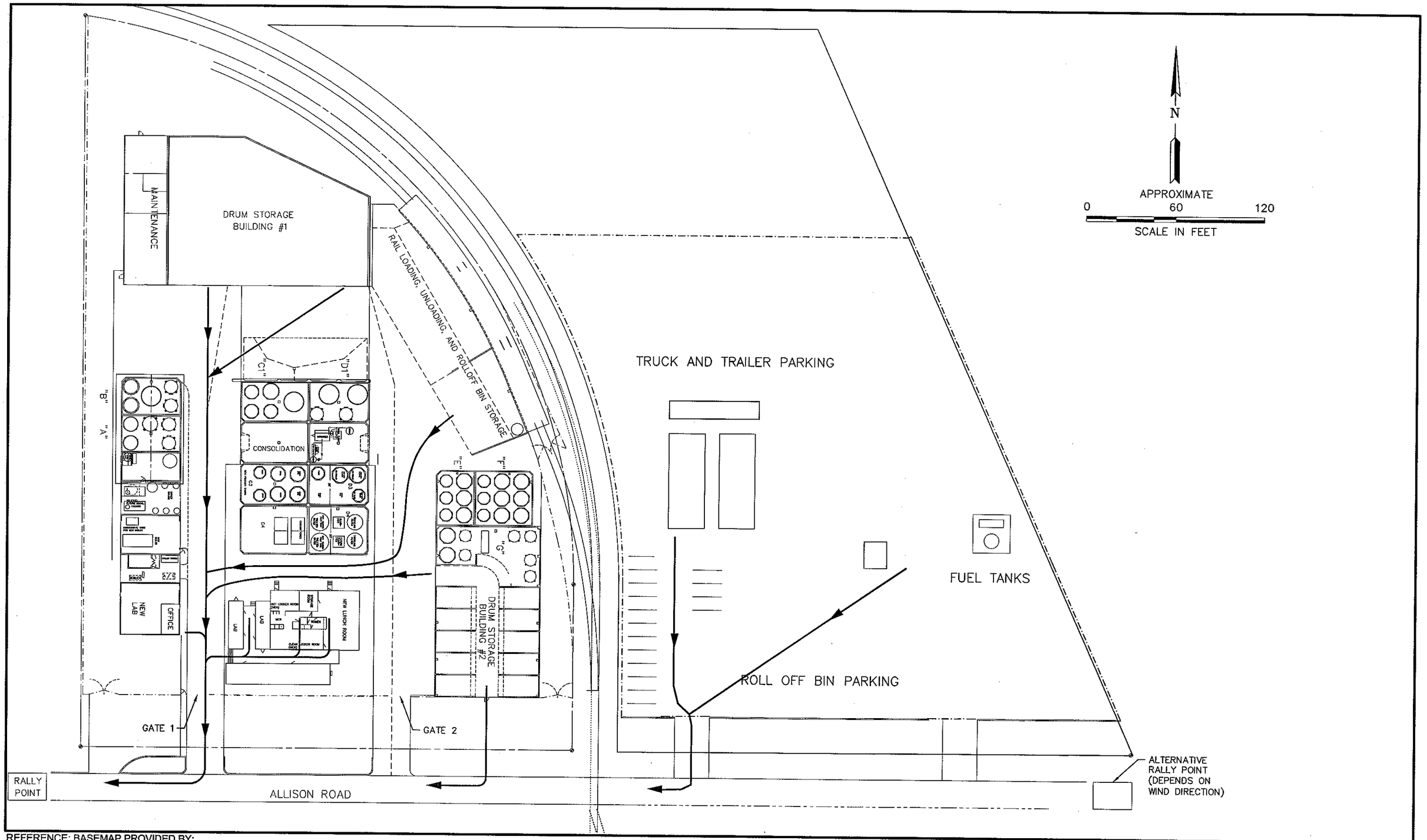
TABLE G-5
PERSONAL PROTECTIVE EQUIPMENT*

Catergories	Level 1	Level 2	Level 3
Spill	Hard Hat (If Applicable); Goggles; Half-face Respirator required unless upwind with sufficient air throughput (ventilation); Apron/Saranex Body Suit/ PVC Rainsuit optional[1]; Chemical Resistant Gloves; Chemical Resistant Boots	Hard Hat (If Applicable); Goggles Half-face Respirator; minimum unless air sampling for O_2, organic vapors, etc reveals no requirement; Apron/Saranex level B Coverall/ PVC Rainsuit optional[1]; Chemical Resistant Gloves; Chemical Resistant Boots	Hard Hat (If Applicable); SCBA minimum unless air sampling for O_2, organic vapors, etc. reveals less stringent requirement; Apron/Saranex Level B coverall/ PVC Rainsuit REQUIRED; Chemical Resistant Gloves; Chemical Resistant Boots
Fire	None required, but avoid fume/smoke inhalation by staying upwind if possible	Hard Hat; SCBA; Turn-out Coat; Chemical Resistant Gloves; Chemical Resistant Boots	

* Use PPE required for the highest applicable level for each applicable category.

Notes: 1 Tyvek okay

FIGURES



REFERENCE: BASEMAP PROVIDED BY:
ROMIC
ENVIRONMENTAL TECHNOLOGIES CORP.
ROMIC SOUTHWEST, CHANDLER, ARIZONA

URS

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Part "B" RCRA Permit Primary Evacuation Route

Romic - Southwest
Chandler, Arizona
Figure G-1

N

APPROXIMATE
0 60 120
SCALE IN FEET

DRUM STORAGE BUILDING #1

MAINTENANCE

RAIL LOADING, UNLOADING, AND ROLLOFF BIN STORAGE

TRUCK AND TRAILER PARKING

"A"

"B"

"C1"

"D1"

CONSOLIDATION

"E"

"F"

"G"

NEW LAB

OFFICE

DRUM STORAGE BUILDING #2

FUEL TANKS

ROLL OFF BIN PARKING

RALLY POINT

ALLISON ROAD

ALTERNATIVE RALLY POINT (DEPENDS ON WIND DIRECTION)

REFERENCE: BASEMAP PROVIDED BY:
ROMIC
ENVIRONMENTAL TECHNOLOGIES CORP.
ROMIC SOUTHWEST, CHANDLER, ARIZONA

URS

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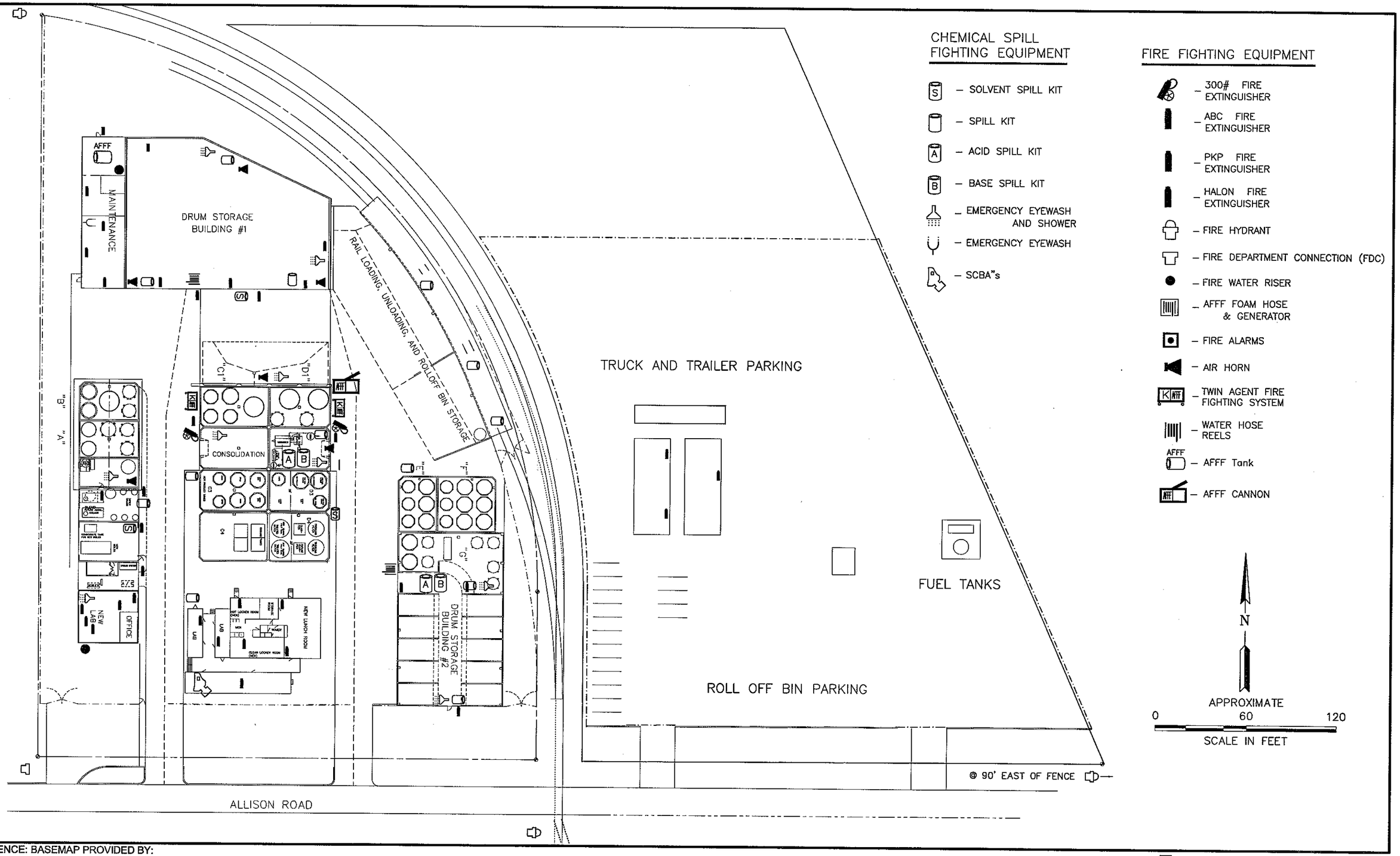
Part "B" RCRA Permit Secondary Evacuation Route

Romic - Southwest
Chandler, Arizona
Figure G-2



REFERENCE: BASEMAP PROVIDED BY:
ROMIC ENVIRONMENTAL TECHNOLOGIES CORP.
ROMIC SOUTHWEST, CHANDLER, ARIZONA

URS

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Emergency Equipment
Romic - Southwest
Chandler, Arizona
Figure G-3

APPENDICES

APPENDIX G-1

INCIDENT REPORT FORM

ROMIC ENVIRONMENTAL TECHNOLOGIES CORP.	Location: Department:

INCIDENT REPORT

Employee completes the first section by the end of the shift in which the event occurred; supervisor by the end of the next shift worked; department manager, within one workday of supervisor's report. Submit to EHS Manager when completed.

Date of Event: _____ Time of Event _____ AM PM

Employee Injury/Property Damage ☐ YES ☐ NO Incident/Near Miss ☐

EMPLOYEE SECTION

Briefly describe the incident/near miss: Equipment, material, location, response, notification, and circumstances contributing to the event.

LOCATION:	
EQUIPMENT/MATERIAL INVOLVED and/or DAMAGED:	
PERSON(S) INVOLVED	
HOW did it happen:	
WHY did it happen?	
At this time I **do not** need medical attention as a result of this accident.	Yes or No
At this time I **want** to be seen by the designated company physician.	Yes or No

The above incident description is true and accurate. I understand that signing this form does not in any way effect my eligibility for Workers' Compensation Benefits if applicable.

Employee Signature _____ **Date/Time** _____

SUPERVISOR SECTION

Extent of damage:						
What response was made:						
Who responded:						
Policy or regulation violation	☐	No	☐	Yes	Specify	
Disciplinary/Coaching Action:						

Witness reports (attach as statement):
Initial recommendations to prevent future occurrence:
Implementation of initial recommendations to date:

Supervisor Signature _____ **DATE/TIME** _____

DEPARTMENT MANAGER SECTION
Coaching and/or Disciplinary action status:
Comments, further recommendations:

Department Manager _____ **DATE/TIME** _____

HEALTH, SAFETY MANAGER SECTION		
Drug Test Administered	YES	No
If no, reasons:		
Cause/Effect analysis completed?	Yes, Attach Report	No, why not?

H&S Program/Procedure Review (H&S Committee Review)

List Program(s) policies, procedures that should have prevented accident and/or incident? Identify Program Revision and/or Application Improvements to prevent reoccurrence.

Program/Policy/Procedure	**Action Required**

Health/Safety Manager _____ **Date** _____

General Manager Review & Signature: _____

Supervisor's Incident Investigation Report

GENERAL INFORMATION

Employee Name _____
Last First MI

Date of Incident _____ **Time of Incident** _____ am / pm
Month Day Year

S M T W T F S
☐☐☐☐☐☐☐

Date of Hire _____
Month Day Year

Location _____

Job Title _____

Employee's History
Is this the employee's first incident?
Yes:____ No:____
If not, how many?: ____
Date of last incident

Location of Incident
____ On Company property?
____ In transit to/from job
____ On Customer property
____ Another location
other _____

Hrs. on Duty Prior
____ 0 - 3 Hours
____ 3 - 6 Hours
____ 6 - 9 Hours
____ 9 - 12 Hours
____ Over 12 Hours

(circle category)
NEAR MISS
FIRST AID ONLY
MEDICAL TREATMENT
RESTRICTED WORKDAYS
LOST WORKDAYS
VEHICLE INCIDENT
PROPERTY DAMAGE
SPILL

For Human Resources Use Only
1. Date report received
2. Department
3. Functional Area
4. Employee Status
5. Job
6. Cause
7. Source
8. Nature of Injury
9. Part of Body
10. OSHA Injury (Y or N)
11. Illness (Y or N)
OSHA Indicators (Circle)
CTD - Objective Findings
Dr. Diagnosis
Second/Third Degree Burn
Fracture
Hospitalization
Loss of Consciousness
Medical Treatment
Cold/Hot Packs, 1-1 Application
Physical Therapy
Sutures/Steri-Strips
Rx Brace (loss of motion)
Job Change
Other
First Aid Indicators (Circle)
Abrasions - Minor
Bruise
Cuts/Punctures - Minor
Elastic Bandage
First Degree Burn
Ointments to Abrasions
Single Application of Ice
Other

DESCRIPTION OF INCIDENT (Who, What, and How)

INCIDENT DATA

Operation:
____ Inadequate guards or barriers
____ Inadequate or improper protective equipment
____ Defective tools, equipment, or materials
____ Congested area
____ Restricted movement
____ Inadequate warning system
____ Uncontrolled fire and explosion hazards
____ Hazardous atmosphere (e.g., gases, dusts, fumes, vapors, lack of oxygen, etc.)

Possible Unsafe Conditions:
____ Poor housekeeping
____ Noise exposure
____ High or low temperature exposure
____ Inadequate or excess illumination
____ Inadequate ventilation
____ Other: _____

Body Part Injured:
____ Eye(s)
____ Head/Neck
____ Face
____ Arm
____ Elbow
____ Wrist
____ Hand
____ Finger(s)
____ Foot
____ Back
____ Lungs/Throat/Mouth
____ Chest/Ribs
____ Abdomen
____ Groin/Genitals
____ Leg
____ Knee
____ Ankle
____ Toe(s)

Protective Equipment:
____ Required but NOT in Use
____ Required and IN Use
____ Not required (may have reduced injury)
____ Not required (would NOT have effect inj.)
____ Specify Protective Equipment in Use

Possible Unsafe Acts:
____ Operating equipment without authority
____ Failure to follow procedures
____ Failure to warn
____ Failure to secure
____ Operating at an unsafe speed
____ Operating at an unsafe capacity
____ Removing or making safety devices inoperable
____ Using defective equipment
____ Failure to use personal protective equipment
____ Using equipment improperly
____ Improper loading
____ Improper placement
____ Improper lifting
____ Improper position for task
____ Servicing equipment in operation
____ Horseplay
____ Under the influence of alcohol or drugs
____ Other: _____

Nature of Injury:
____ Foreign Object
____ Cut
____ Bruise/Contusion
____ Sprain/Strain
____ Fracture
____ Burn (Chemical)
____ Burn (Thermal)
____ Chemical Irritation
____ Amputation
____ Puncture Wound
____ Hernia
____ Dermatitis
____ Smashed/Pinched
____ Abrasion
____ Infection
____ Other: _____

Incident Type:
____ Struck By/Against
____ Caught In/Out/Between
____ Fall (same level)
____ Fall (different level)
____ Slipping/Tripping
____ Vehicle Incident
____ Other: _____
____ Temp. Exposure
____ Repetitious Trauma
____ Over Exertion
____ Chemical Exposure
____ Skin
____ Inhalation

(Continued on Backside)

ACTIONS TO PREVENT INCIDENT RE-OCCURRENCE

___ Revise Pre-Job Instructions
___ Reevaluate Job Safety Analysis
___ Revise Standard Operating Procedure
___ Improve Design or Re-Engineer
___ Improve Construction
___ Improve Worksite Layout
___ Replace or Repair Equipment
___ Install Guard or Safety Device
___ Reevaluate PPE
___ Retrain Person(s) Involved
___ Request Safety Observations
___ Improve Inspection/Monitoring Methods
___ Improve training program
___ Discipline Person(s) Involved
___ Other_____

Required Information

Possible Root Cause(s)

1 _____

2 _____

3 _____

4 _____

Possible Indirect Cause(s)

1 _____

2 _____

3 _____

4 _____

All actions checked above MUST be explained how reoccurrence will be prevented.

Recommended Corrective Action(s)

1 _____

2 _____

3 _____

4 _____

Individual assigned responsibility for carrying out measures for preventing recurrence.

_____ _____
Name Title

Date corrective action to be completed: _____
Date

Signature_____ _____
General Manager Date

(Attach all additional pages if needed)

APPENDIX G-2

MEMORANDA OF AGREEMENT

CONTINGENCY PLAN TRANSMITTALS

GILA RIVER INDIAN COMMUNITY

SACATON, AZ 85247

LAW OFFICE
Post Office Box 97
(520) 562-3311 or (602) 963-4323
Fax: (520) 562-3433

July 23, 1996

Gregory Hedger
Regulations Affairs Manager
ROMIC
6760 W. Allison Road
P.O. Box 5004
Chandler, Arizona 85226

RE: Jurisdiction over lands located within the Lone Butte Industrial Park

Dear Mr. Hedger

As you know, the Lone Butte Industrial Park (the "Park") is located within the exterior boundaries of the Gila River Indian Community (the "Community") and thus on reservation lands. Any incidents that occur within these boundaries, including within the Park are subject to the jurisdiction of the Community and those governmental services the Community provides. In the event of an emergent situation at your facility or within the Park, the responding agency would be the Gila River Indian Community Fire Department or other emergency personnel serving the Gila River Indian Community. Because the Park is located on the reservation the City of Chandler would not have jurisdiction to respond to emergency situations at the Park. I hope this clarifies any questions you may have regarding the party that would be responding to emergency calls at your facility. Should you require further clarification or have additional questions, please do not hesitate to contact me.

Sincerely,

Charlene D. Jackson
Assistant General Counsel

xc: Gila River Fire Department
file

ecology
and
economy
through
reclamation

ROMIC
CHEMICAL CORPORATION
SOUTHWEST

Reclamation of Solvents, Chemicals for All Industries

6760 W. ALLISON RD. • P.O. BOX 5004 • CHANDLER, AZ 85226 • PHONE (602) 961-1040 • FAX: (602) 961-7944

Romic Chemical Corp. Southwest may contact you for assistance regarding an emergency situation. This letter will function as acknowledgement of the service requested.

In compliance with the Resource Conservation and Recovery Act (RCRA) and U.S.E.P.A. we are notifying you that our contingency plans address emergency services (please see enclosed) and according to RCRA 40 CFR 265.52 we must describe arrangements agreed to.

Please read the attached agreement and sign the acknowledgement below. Return this acknowledgement by return mail for our files and maintain our plan in your files for possible reference.

Thank you for your expedient response to this request.

Anne Grace, RN
Paramedic Coord.
821-3206

Very Truly Yours,
ROMIC CHEMICAL CORP. SOUTHWEST

Richard McIver

Richard McIver
Regulatory Affairs Supervisor

This acknowledgement serves as notice that the undersigned, a representative of Chandler Regional Hospital Company has received a copy of the Romic Chemical Corp. Southwest contingency plan and arrangements requested by Romic. We acknowledge agreement to provide specific services requested and bill for those services accordingly.

SIGNED BY Kenneth A Brown

PRINT NAME Kenneth Aaron Brown

TITLE Medical Director

COMPANY Chandler Regional Hospital

ADDRESS 475 S. Dobson

Zip 85224

SERVICE REQUESTED Emergency Medical Assistance.

DATE OF RECEIPT 4-6-89

ecology
and
economy
through
reclamation

ROMIC
CHEMICAL CORPORATION
SOUTHWEST

Reclamation of Solvents, Chemicals for All Industries

6760 W. ALLISON RD. • P.O. BOX 5004 • CHANDLER, AZ 85226 • PHONE (602) 961-1040 • FAX: (602) 961-7944

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Please read the attached agreement and sign the acknowledgement below. Return this acknowledgement by return mail for our files and maintain our plan in your files for possible reference.

Thank you for your expedient response to this request.

Very Truly Yours,
ROMIC CHEMICAL CORP. SOUTHWEST

Richard McIver
Regulatory Affairs Supervisor

This acknowledgement serves as notice that the undersigned, a representative of Arizona D.P.S. Company has received a copy of the Romic Chemical Corp. Southwest contingency plan and arrangements requested by Romic. We acknowledge agreement to provide specific services requested and bill for those services accordingly.

SIGNED BY _____ COMPANY ARIZONA DEPT. OF PUBLIC SAFETY

PRINT NAME STEVE HERMANN ADDRESS P.O. Box 6638, Phoenix, Arizona 85005-6638

TITLE HAZ. MAT. UNIT COMMANDER SERVICE REQUESTED Coordinator D.P.S. responses,pertaining to I-10.

DATE OF RECEIPT APRIL 17, 1989