IYRS School of Technology & Trades 449 Thames Street and 10 Spring Wharf Newport, RI 02840

RCRA Environmental Compliance Version 2.0 September 2017

IYRS School of Technology & Trades RCRA CONTINGENCY PLAN Newport Campus 40 CFR 265 Subpart D 29 CFR 1910.138 Emergency Evacuation

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IYRS RCRA CONTINGENCY PLAN 40 CFR 265 Subpart D

G.1 GENERAL INFORMATION

The International Yacht Restoration School (IYRS) is located at 449 Thames Street Newport, RI 02840, as shown in Figure 1. This facility operates its own <90 RCRA waste storage facility and some satellite storage areas, as shown in Figure 2. The site manages hazardous wastes in containers and drums for off-site treatment/disposal, as depicted in Figure 3.

G.2 EMERGENCY COORDINATORS

The following personnel are designated as Emergency Coordinators and are authorized to commit necessary resources to implement the Contingency Plan. They are thoroughly familiar with all operations and activities, characteristics of the waste materials handled, and the location of all records pertinent to the facility's operations. All Emergency Coordinators are on call 24 hours a day.

Primary Emergency Coordinator John Cayer, Facilities and Marina Manager

Phone Numbers: Work: 401-848-5777 ext 212 Cell: 401-207-3444

Residence address: 207 Bellevue Avenue Newport, RI 02840

Secondary Emergency Coordinator Bill Kenyon, Instructor

| Phone Numbers: | Work | 401-848-5777 ext 213 |
|----------------|------|----------------------|
| | Cell | 401-742-3091 |

Residence address: 204 Mount View Ave. North Kingston, RI 02852

Additional Emergency Coordinator (Brooks) Scott Monroe, Instructor

Phone Numbers: Work 401-848-5777 ext 225 Cell 401-5854342

Residence address: 430 Fletcher Road North Kingston, RI 02852

G.3 IMPLEMENTATION

Personnel designated as Emergency Coordinators are responsible for coordinating environmental emergency activities. Personnel assigned to hazardous material areas in the facility have been trained in initial emergency response in accordance with 40 CFR 265 Subpart D.

G.4 EMERGENCY RESPONSE PROCEDURES

G.4.1 First Responders

First responders initiate response action and, based on the degree, nature and safety of the situation, attempt to take actions necessary to minimize the environmental effects of a fire, explosion, or release of hazardous waste or materials. Initial actions include:

- 1. Maintain a safe distance from the immediate danger.
- 2. Secure the area and notify IYRS management and nearby work areas which may be affected.
- 3. For emergency assistance call 911 and state the nature and location of the emergency:
- 4. Send someone to meet emergency personnel.

Subsequent initial response actions may require:

- In the event of a fire or explosion, alert the Newport, RI Fire Department by dialing 911 (or 401-846-2211) on a nearby telephone, and by pulling a fire alarm box. In the event of a fire in early stage development, an attempt may be made by area personnel to extinguish using portable fire extinguishers.
- Contain the spill to prevent horizontal and vertical migration, as quickly as possible. Absorbent booms or sand bags may be utilized for containment.

G.4.2 Notification

When an emergency situation occurs, (i.e. fire, explosion or release of hazardous waste constituents that could threaten human health or the environment) the following Emergency Coordination is implemented:

- Internal facility alarms or communication systems are activated as applicable to notify facility personnel of the event. A more detailed discussion of the Evacuation Plan is provided in Section G.7.
- Requirements for regulatory agency notifications are assessed and notification to the appropriate authorities is made based on the situation involved.

G.4.3 Identification of Hazardous Materials

In the event of a release, fire or explosion, emergency coordinators will identify the material, source, amount, and area extent of the release.

If the released material cannot be immediately identified, then the Emergency Coordinators will arrange to have samples collected for chemical analysis at a contract laboratory. Other resources for identifying the release could include manifests, waste characterizations, records review, generator knowledge and/or operation logs.

G.4.4 Assessment

Emergency Coordinators will assess possible hazards, both direct and indirect, to human health and the environment (e.g., toxicity, irritability, generation of asphyxiating gases, heat-induced explosions). Upon evaluation of the incident, appropriate actions will be followed to ensure containment and cleanup of the release.

If the Emergency Coordination assessment determines that the release, fire, or explosion could threaten human health or the environment outside the facility, the following will occur:

- Emergency Coordinators will immediately notify:
 - 1. The National Response Center (1-800-424-8802)
 - 2. The Rhode Island Department of Environmental Management (1-401-222-6800, or 1-401-222-3070 when outside normal works hours) if there is an actual or threatened significant impact to the community or release to the environment in excess of a reportable quantity.

Provide the following information (call is recorded):

- 1. Name and telephone number of the reporter.
- 2. Name and address of the facility including EPA I.D. No. RI5000011866
- 3. Date, time and type of incident.
- 4. Name and quantity of material(s) involved.
- 5. Extent of injuries, if any
- 6. Estimated quantity and disposition of recovered material resulting from the incident.
- 7. Potential hazards to human health and the environment outside the facility
- 8. The initial response action taken.
- In addition, the following agencies will be notified, as required or if their assistance is necessary:

| City of Newport, RI Fire Department | 401-846-2211 Emergency: 9-1-1 |
|-------------------------------------|----------------------------------|
| City of Newport Police Department | 401-847-1212 Emergency: 9-1-1 |

G.4.5 Control Procedures

Controls for designated hazardous waste areas are discussed in Sections G.4.10 below.

G.4.6 Prevention of Recurrence or Spread of Fires, Explosions, or Releases

During an emergency, the Emergency Coordinator will take reasonable measures to ensure that fires, explosions and releases do not occur, recur, or spread to other hazardous waste management areas at the facility. This includes stopping processes and operations, collecting released waste, and recovering or isolating containers. Applicable employees are trained on specific actions to be taken in response to an emergency.

G.4.7 Storage and Treatment of Released Material

As control is established, Emergency Coordinators will make arrangements for treatment, storage, and disposal of recovered waste, contaminated soil, surface water or any other contaminated material as is appropriate based on its characteristics. Samples of contaminated material may be analyzed if needed to determine its characteristics or composition for proper handling and disposal.

G.4.8 Incompatible Wastes

Emergency Coordinators will assess the compatibility of release materials with activities or material storage within the impact area.

G.4.9 Post-Emergency Actions

After an emergency event, emergency equipment is cleaned so that it is fit for use or it is replaced. Before operations resume, an inspection of safety equipment is conducted. Affected containment areas are effectively emptied and washed, capturing residuals and rinses for proper disposal.

Before operations are resumed at the facility, Emergency Coordinators will notify appropriate state and local authorities that the facility response and cleanup are complete in the affected areas. Written report(s) on the incident will be submitted, as required (see Section G.8).

If the incident required the activation of the Contingency Plan, Emergency Coordinators will advise the operator in the area of the release to complete an incident investigation and assign appropriate corrective actions using the facility incident database.

G.4.10 Container Spills and Leaks

Routine inspections of the storage areas for contained wastes to ensure that the containers are in good condition. Prior to storage, all wastes in the <90 day storage areas are determined to be compatible with the drums in which they are contained and with other wastes in the storage area. All container areas for liquid waste provide secondary containment.

If a spill is observed or a leak detected, sand bags or barriers of absorbent material may be used to contain the spilled liquid in the immediate vicinity of the affected container. The Emergency Coordinators will be notified (also notify COO Rebeka Mazzone (401) 644-3075) and implement Emergency Coordination, as needed. Small amounts of spilled liquid may be captured using absorbents and shovels. Materials captured or contaminated absorbent(s) will be characterized, placed in an appropriate container, properly labeled, and either incinerated on site or shipped off site for proper disposal. Salvage drums are maintained in supply if needed to over pack leaking containers.

G.5 EMERGENCY EQUIPMENT

A list of emergency equipment available in the event of an accident or incident resulting in the release of hazardous waste to the environment is provided in Table 1. Location of this equipment can be found in Figures 2 and 3, including the locations of spill kits available in proximity to hazardous waste management areas.

Telephones for internal and external communications are available near each hazardous waste management unit. Additionally, operations personnel routinely carry internal/external communication devices (e.g. cell phones). Telephone communication with the Newport Fire Department would be the first step in activating facility alarms in case of an emergency. Fire alarm boxes that notify the Fire Department automatically are also located near many of the storage areas.

G.5.1 Spill Response Contractors

IYRS has retained the following spill response contractor who is available to respond to spills 24/7:

Clean Harbors Business Telephone: 401-431-1847

The above emergency spill response contractor employs personnel specifically trained in handling hazardous materials. This contractor has a wide range of equipment, including absorbent material, oil booms, vacuum trucks and tankers, bulk tankers, dump trucks, excavation equipment, and mobile treatment and filtration systems.

G.5.2 Fire Extinguishing and Safety Equipment

Emergency Coordinators have the opportunity to be trained in portable fire extinguisher response and are capable of using extinguishing equipment as needed. These extinguishers are inspected monthly, serviced annually, and located so that travel distance to each extinguisher location is kept to a minimum. Additional fire extinguishing capability includes strategically located fire hose hook-up. Figures 2 and 3 show the location of fire alarms and portable fire suppression equipment in proximity to each hazardous waste management area.

G.6 COORDINATION AGREEMENTS

Pursuant to 40 CFR 265.37, arrangements have been made with state and local emergency response groups to address and coordinate emergency response activities of incidents involving IYRS. Copies of this emergency plan have been distributed to the organizations listed below. IYRS will ensure that the following organizations receive the most current version of the Contingency Plan:

- City of Newport, RI Fire Department Wayne Clark, Fire Marshal wclark@cityofnewport.com
- City of Newport Police Department Lieutenant Kevin Moreira, Administrative Services Records Lieutenant <u>kmoreira@cityofnewport.com</u>
- Newport Hospital Pam Crocker, director of facilities and space planning <u>Pamela.Crocker@Lifespan.org</u>, Cc: <u>Heidi.Petrone@Lifespan.org</u>
- Rhode Island Hospital

IYRS has provided these agencies, whose assistance may be needed, with opportunities and/or resource materials to familiarize them with the facility layout, properties and associated hazards of hazardous materials handled at the facility, location of facility personnel, entrances to and from roads inside the facility, and possible evacuation routes.

G.7 EVACUATION PLAN

The facility telephone system may be used to report an imminent emergency or event perceived as a threat to the Emergency Coordinators by dialing the main line (401) 848-5777. The Emergency Coordinators are trained in the recognition of and response to emergency alerts.

When notice is given (audio alerts or verbal intercommunication), personnel are to follow applicable emergency shutdown procedures and evacuate the area as follows:

- 1. Proceed along designated primary exit route, or alternate route as deemed necessary, to the unit assembly point. Do not stop to retrieve personal belongings. Always carry your vehicle keys so a prompt exit is possible.
- 2. If in a different unit during an evacuation event, exit the building with personnel from that area.
- 3. Do not re-enter the building until the ALL CLEAR notice is provided by either the Newport Fire Department, the Newport Police Department or the Emergency Coordinators.

Primary, secondary routing and designated assembly areas are posted throughout the facility.

Evacuation routes, relative to the proximity of hazardous waste management areas, are shown in Figures 2 and 3.

G.8 REQUIRED REPORTS

The facility incident database will include the occurrence of incidents that required implementation of this Contingency Plan.

The Rhode Island Department of Environmental Quality will be notified in writing within 15 days of an emergency incident requiring notification of a hazardous waste release at the facility. The report will include:

- 1. Name, address and telephone number of the facility and owner or operator:
- 2. Date, time and type of incident;
- 3. Type and quantities of materials(s) involved;
- 4. Extent of injuries, if any;
- 5. Assessment of any hazards to human health or the environment, if applicable;
- 6. Estimated quantity of recovered material and its disposition.

G.9 AMENDMENTS TO CONTINGENCY PLAN

This plan will be reviewed and amended, as necessary, under any of the following circumstances:

- •
- If applicable regulations are revised;
- Following an emergency;
- Whenever the facility changes its design, construction, operations, maintenance or other conditions in a way that increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency; or
- Whenever the list of Emergency Coordinators or emergency equipment changes.

Table 1: Facility Response Equipment

INDOOR EQUIPMENT LISTING

| AVAILABLE EQUIPMENT | CAPABILITIES |
|--|--------------------------------|
| Cell Phones | Communication |
| Fire Alarm Pulls & Power Shut Down Pulls | Communication & Fire Control |
| Fire Extinguisher, ABC | Fire Control |
| Fire Hose Connector N. Side Brick Bldg. | Fire Control |
| Emergency Shower & Eye Wash Stations | Rinse Off & Wash Out Eyes |
| Safety Glasses & Goggles | PPE |
| Gloves & Boots | PPE |
| Suit, Coveralls | PPE |
| Disposal Bags | Waste Containment |
| Plastic Shovel | Waste Containment |
| COMMON SPILL KIT CONTENTS | CAPABILITIES |
| Absorbent Pads | Spill Absorption |
| Absorbent Socks | Spill Absorption & containment |

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| AVAILABLE EQUIPMENT | CAPABILITIES |
|---|--------------------------------|
| Cell phones | Communication |
| Fire Extinguishers ABC | Fire Control |
| Drain Plug | Spill Containment |
| Fire Hose Connector N. Side Brick Bldg. | Fire Control |
| COMMON SPILL KIT CONTENTS | CAPABILITIES |
| Safety Glasses & Goggles | PPE |
| Gloves & Boots | PPE |
| Suit, Coveralls | PPE |
| Plastic Shovel | Spill Containment |
| Plastic Sheeting | Spill Containment |
| Absorbent pads | Spill Absorption |
| Absorbent socks | Spill Absorption & Containment |
| Disposable Bags | Waste Containment |

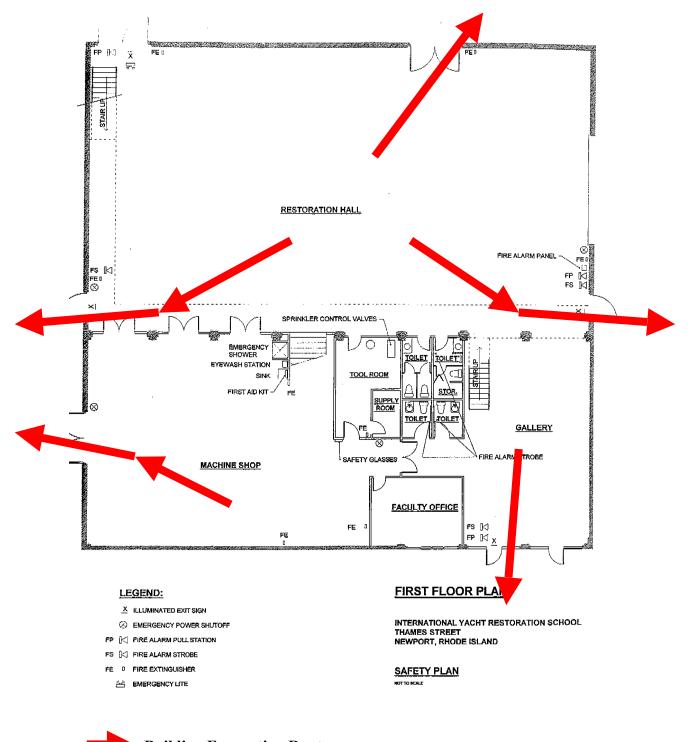
OUTDOOR EQUIPMENT LISTING

Revised: September 2017

Figure 1: Site Location Map IYRS School of technology & Trades 449 Thames Street & 10 Spring Wharf Newport, RI 02840



Figure 2a: Site Map and Evacuation Route Restoration Hall 449 Thames Street Newport, RI 02840



Building Evacuation Routes

Figure 2b: Site Map and Evacuation Route Brooks Building 10 Spring Wharf, 1st Floor Newport, RI 02840

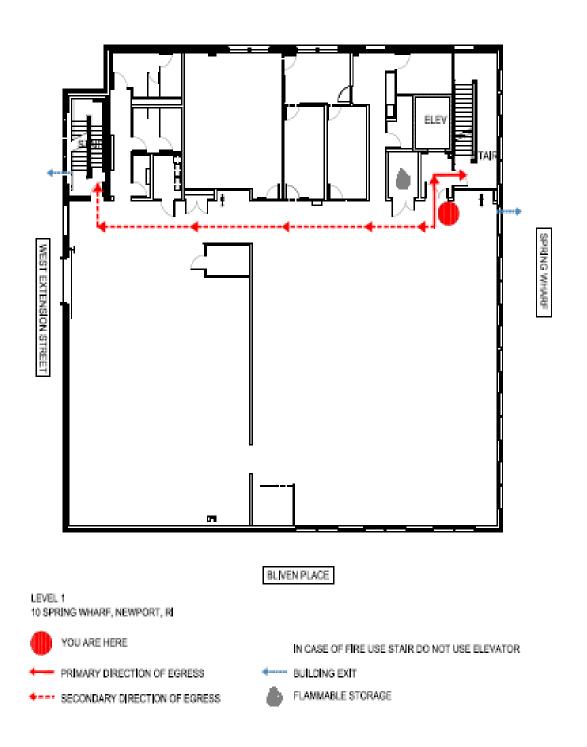


Figure 2c: Site Map and Evacuation Route Brooks Building, 2nd Floor 10 Spring Wharf Newport, RI 02840

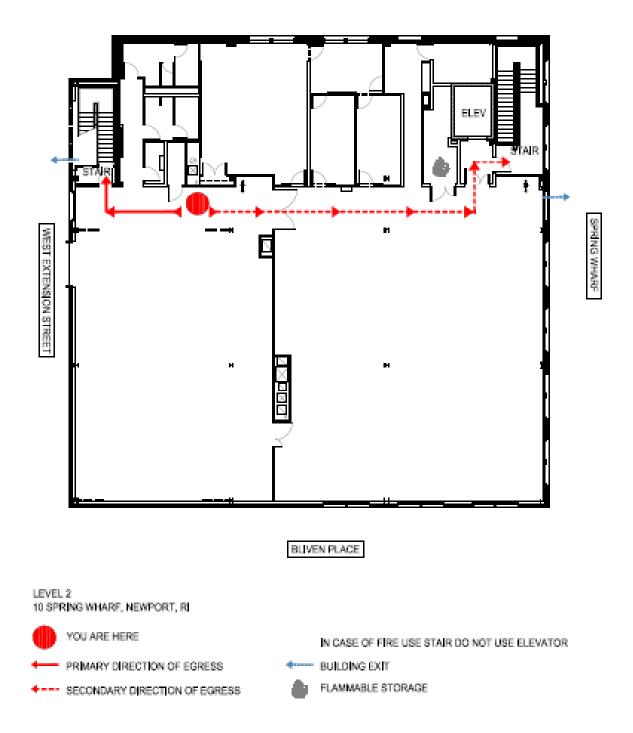


Figure 3 RCRA Waste Management Units & Evacuation Assembly Area

International Yacht Restoration School 449 Thames Street Newport, RI 02840

