

SUMMARY

HYDE PARK LANDFILL REQUISITE REMEDIAL TECHNOLOGY (RRT) PROGRAM SECTION 12.0, ENVIRONMENTAL HEALTH AND SAFETY PLANS

INTRODUCTION:

The Environmental Health and Safety Plan (RRT Safety Plan) is designed to protect the health and environment of the adjacent community and the health of workers during the RRT Program. The RRT Safety Plan applies to both Survey Activities (e.g. installation of wells) and Special Construction Activities (remedial construction such as the installation of the overburden barrier collection system). The RRT Safety Plan will be developed through the submission of plans and specifications to the EPA/STATE for review and approval. The plans and specifications must be consistent with the Section 12.0, Environmental Health and Safety Plan requirements.

The community and on-site workers are both protected through the development and implementation of air monitoring plans, an emergency plan and a particulate dispersion (dust suppression) control program. In addition the community is further protected by the development and implementation of site security and material access and removal control programs. Workers are further protected by Occupational Safety and Health Administration (OSHA) requirements, protective clothing and equipment and periodic medical examinations.

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General Components of RRT Safety Plan

Air Monitoring Program

The air monitoring plan focuses on the potential source of vapors or dust at survey and working sites (e.g. well installations or trenching work). Air monitoring begins at the survey or working site and proceeds towards the community. This allows for early identification of a potential problem at the survey or working site and therefore the immediate initiation of corrective action. If the corrective action does not reduce or eliminate the problem, the drilling or construction activity will be stopped until proper corrective action can be completed successfully.

The type and location of air monitoring for Survey and Special Construction Activities are listed below:

Survey Activities

- (1) organic vapors - downwind perimeter of each survey site
- (2) particulate levels - at each survey site
- (3) flammability - at each survey site (downwind)

Special Construction Activities (remedial construction)

(1) organic vapors - at each working site

- downwind of each working site

(2) particulate levels - at each working site

- downwind of each working site

- at the perimeter of the site

(includes the measurement of
associated semi-volatile
organics, if required)

- beyond the perimeter of the

site in the community (in-
cludes the measurement of
associated semi-volatile
organics, if required)

(3) flammability - at the working site

Site Security

Site Security is required for both Survey and Special Construction Activities. The highlights of each are listed below:

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Survey Activities

- (1) survey site-temporarily fenced
- (2) regularly patrolled during non-working hours
- (3) access limited to authorized personnel

Special Construction Activities

- (1) fenced or otherwise secured to prevent unauthorized access
- (2) patrolled on a 24 hour basis
- (3) access limited to authorized personnel

The above actions minimize the occurrence of unauthorized persons from entering the survey or working site.

Particulate Dispersion Control/Material Access and Removal

To control dust emissions, the following must be done:

- (1) Excavated areas must be kept moist by a water misting system.
- (2) Soils transported from the working site to the landfill must be transported in tightly covered watertight containers.
- (3) Haul roads must be treated with appropriate dust control agents.

All vehicles used at any survey site or working site must be cleaned before they can be removed or driven from the site. Survey vehicles can, however, be driven from the survey site (after loose mud and debris removal) to the cleaning station. These procedures minimize the potential for contaminated soils being tracked through the community.

Emergency Plan

An emergency plan will be developed for both Survey and Special Construction Activities. The emergency plan provides a means to rapidly respond to on-site emergencies, should they occur. The emergency plan is part of the RRT Safety Plan and establishes procedures that must be implemented during defined emergencies at the site. Emergencies include occurrences such as:

- (1) personal injury

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- (2) hazardous materials spill (such as non-aqueous phase liquids)
- (3) fire/explosion
- (4) vapor emissions

The plan includes a listing of emergency personnel and organizations, and their telephone numbers. These people are contacted should an emergency occur. Emergency organizations include for example, the local police and fire agencies, hospitals, ambulance, and local industrial emergency response teams. Copies of the emergency plan must be provided to local hospitals, fire departments and police agencies. Emergency equipment such as fire extinguishers and emergency eye-wash/shower units are required. Personnel trained in first-aid techniques must be present at the site at all times.

Compliance with the RRT Safety Plan

The Occidental Chemical Corporation (OCC) Safety Officer is responsible for maintaining compliance with the RRT Safety Plan. This individual has the authority to suspend work. The EPA/STATE will oversee OCC's implementation of the RRT Safety Plan requirements through the presence of an on-site representative.