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February 3, 2016

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Jefferson City, Missouri 65101-4130

Mr. James Aycock
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US EPA Region 7
Air, RCRA, and Toxics Div.
11201 Renner Road
Lenexa, KS 66219-9601

Certified Mail Receipt – MDNR: 7015 0640 0007 6987 4143

Certified Mail Receipt – US EPA: 7015 0640 0007 6987 4150

Re: Class 2 Contingency Plan Update/Modification
Buick Resource Recycling Facility, LLC (BRRF); Boss, Missouri, EPA ID# MOD059200089

Dear Messrs. Nussbaum and Aycock,

BRRF is requesting approval of the enclosed Contingency Plan. The Contingency Plan has been updated to reflect that chlorine monitors are no longer necessary due to the discontinued use of chlorine gas at the facility and has been updated to include other minor changes. BRRF believes this to be a Class 2 permit modification requiring the Director's approval as identified in 40 CFR 270.42 Appendix I B.6.c.

Should you or any of your associates have any questions, please feel free to contact me at the numbers below and we will make arrangements to have their inquiries addressed.

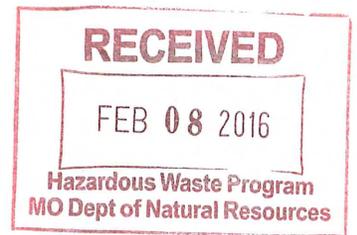
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information is submitted, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,


James M. Lanzafame

cc: Mr. Bill Fanska, MDNR HWP
Mr. Nathan Kraus, MDNR HWP
Ms. Gen Bodnar, The Doe Run Company
Ms. Julie Marks, Barr Engineering

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Hwy KK
Boss, MO 65440
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THE DOE RUN COMPANY

BUICK RESOURCE RECYCLING FACILITY

CONTINGENCY PLAN

(Revised November 2015)

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LIST OF ADDENDA

June 1991 - In Section B, information was added regarding the introduction of emergency coordinators. In Section C.5, information was added regarding the capability of the wastewater treatment system to handle contaminated water. In Section D, information was added regarding communication devices, emergency equipment, and water for firefighting.

July 1992 – MO DNR approved the storage of D008/D004 (lead, arsenic), D008/D006 (lead, cadmium), K002 (lead chromate paint pigment sludge), K003 (lead molybdate paint pigment sludge) and K046 sludges from manufacturing of lead initiating compounds) wastes at the facility. The list of Emergency Coordinators was also modified.

July 1993 – A drum shredder was constructed, under a Temporary Authorization from EPS, in the Palletized Storage Area. The permit modification request also included additional hazardous waste storage in the Covered Material Storage Building in the charging area. The list of Emergency Coordinators was also modified.

Dec. 1993 – Additional revision to Emergency Coordinators List

Sept. 1994 – Revision to Emergency Coordinator's List Chemical S.O.P.s added for spill/release response actions. Headquarter's address change. Emergency equipment list also revised. Third-party spill response agreement added to plan.

Sept. 1995 – HazWoper provisions for plant personnel and other EPA comments added include modifications to spill response and notifications added to chemical S.O.P. sections.

Sept. 1996 – Revision to Emergency Coordinator's List

Sept. 1997 – Process Safety Investigation Form added. Emergency Coordinators list revised.

Sept. 1999 – Chlorine Alarm system added. Meteorological Monitoring System added.

Dec. 2000 – Incorporation of updated HazWoper provisions.

Jan. 2001 – Revision to Emergency Coordinator's List

Oct. 2001 – Revision to Emergency Coordinator's List

Jan. 2003 – Revision Emergency Coordinator's List

May 2004 – Revision to Emergency Coordinator's List, In-Plant Emergency Coordinators List and Emergency Coordinators Home Phone Numbers and Addresses

April 2006 - Revision to Emergency Coordinator's List, In-Plant Emergency Coordinators List and Emergency Coordinators Home Phone Numbers and Addresses

April 2008 - Revision to Emergency Coordinator's List, In-Plant Emergency Coordinators List and Emergency Coordinators Home Phone Numbers and Addresses

May 2008 - Emergency Coordinators Home Phone Numbers and Addresses and Emergency Equipment List

Aug 2008 – Revision to the regulation quoted in the General Information section, revisions to the facility description section, and revisions to Emergency Coordinators Home Phone Numbers and Addresses

March 2009 – Revision to facility description, Emergency Coordinators List, Emergency Coordinators Home Phone Numbers and Addresses, and Chemical Spill SOPs.

April 2010 – Revision to order of Emergency Coordinators

September 2010 – Revision to Emergency Coordinators

May 2010 – Revision to Emergency Coordinator addresses and coordinators

June 2011 – Revision to Emergency Coordinators addresses and added Traffic Office to copies of Contingency Plan.

October 2011 – Revision to Emergency Coordinator phone numbers and added Refinery Supervisor's Office to copies of Contingency Plan.

May 2012 – Deleted reference to chlorine gas, Updated Emergency Coordinators addresses and phone numbers.

October 2012 – Updated emergency coordinators, updated emergency equipment, and removed chlorine tank leak response procedure

June 2013 - Updated emergency coordinators and emergency equipment

November 2013 – Updated General Manager Information

February 2014 – Updated emergency coordinator information

April 2014 – Updated emergency coordinator information and emergency equipment.

May 2014 – Updated emergency coordinator information

August 2014 – Updated emergency coordinator information, Sheriff number, in-plant coordinators.

Sept. 2014 – Modify language on new-hire training in section A-1. Re-format pages.

May 2015 – Update emergency coordinators. Update references to MSDS to read “SDS,” in compliance with new GHS and OSHA Hazcom. Added 3E Company contact information.

August 2015 – updated emergency coordinators

October 2015 - Corrected typographical errors, updated emergency equipment descriptions, updated notification text,

CONTINGENCY PLAN

A. GENERAL INFORMATION

The information provided in this section is included as required by 40 CFR 266.80(b)(2), which incorporates by reference 40 CFR 264 Subpart D – Contingency Plan and Emergency Procedures. The regulation requires that all permitted lead-acid battery facilities that reclaim batteries through methods other than regeneration have a contingency plan for the facility. The plan presented herein is designed to minimize hazards to human health and 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. The provisions of this plan will be carried out immediately whenever there is a threat to human health or the environment from this type of emergency situation.

FACILITY DESCRIPTION

The Buick Resource Recycling Facility is located at 18594 Highway KK in Boss, Missouri. The facility is owned and operated by The Doe Run Resources Company d/b/a The Doe Run Company, 1801 Park 270 – Suite 300, St. Louis, Missouri, 63146.

The Buick Facility was designed as a model resource recycling facility. The facility has been designed to receive spent lead acid batteries (both automotive and industrial) and battery manufacturing plant scrap for recovery of lead metal and polypropylene. Waste streams such as miscellaneous plant trash and blast furnace slag are generated during the recovery process.

The incoming recyclable materials are received at the unloading docks. From there, the starting, lighting and ignition (SLI) batteries are brought into the recovery process in the BSN. A special area has been designed for handling the industrial batteries. The battery plant scrap, hazardous wastes and other lead contaminated materials also enter into the recovery process at this point.

The lead metallics (grids and posts) and lead paste, recovered at the battery processing facility, are feed for the Blast Furnace or Reverberatory Furnace. The remaining feed materials are stored in the Palletized Storage Area and directed to the BSN process, the Reverberatory Furnace or the Blast Furnace for recovery.

A personnel training plan, which includes instruction in safe work standards and emergency response training, minimizes the potential for emergency situations. A general inspection plan minimizes potential hazards. In the event a situation does arise which requires emergency response, the procedures described in this contingency plan will be followed.

All employees that will be responsible for responding to an emergency spill situation will be required to be trained in the appropriate OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) standards required for RCRA TSD facilities. All management personnel associated with emergency spill response responsibilities as outlined in this plan, including in-plant coordinators, will have a minimum of 24 hours training dedicated to HAZWOPER, meeting the qualifications as a Level 3 “hazmat technician” responder. Additionally, all new-hire employees working at the Buick site have general awareness of HAZWOPER training.

COPIES OF CONTINGENCY PLAN

A copy of this contingency plan and all revisions will be maintained at the Buick facility, on the \\drcbrd01\ server in the BRRD Environmental folder, and at Corporate headquarters in St. Louis. Additional copies at the Buick facility include: the training room in changehouse, right to know binder location across from lunchroom, offices, Traffic Office, Refinery Supervisor’s office and the Administration office.

AMENDMENT OF CONTINGENCY PLAN

The contingency plan will be reviewed and amended as soon as practical, if necessary, whenever:

- a. The facility permit is revised;
- b. The plan fails in an emergency;
- c. The facility changes – in its design, construction, operation, maintenance, or other circumstances – in a way that materially changes the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- d. The list of emergency coordinators changes; or
- e. The list or emergency equipment changes.

A debrief will be conducted with all affected plant and regulatory personnel after an incident occurred that resulted in implementing the contingency plan and the plan may be revised should recommendations for improvement derive from the debriefing session.

B. EMERGENCY COORDINATORS

At all times at the Buick Resource Recycling Facility there will be at least one employee on the facility premises available to respond to an emergency. Those persons designated as emergency coordinators will have the responsibility for coordinating all emergency response measures. They are familiar with all aspects of this contingency plan, all operations and activities at the Buick facility, and the facility layout. In addition, those individuals serving in this capacity have been trained in accordance with the OSHA HAZWOPER provisions and have the authority to commit the resources needed to carry out the contingency plan.

The actual responsibilities of the Emergency Coordinator are detailed in subsequent sections. Table 1 lists the names, addresses, and telephone numbers (office and home), in order of highest authority, of those persons qualified to act as emergency coordinators at the Buick facility. A letter introducing the emergency coordinators has been sent to the Director of the Missouri Department of Natural Resources – Waste Management Program, within 30 days of initial operation of the facility.

C. IMPLEMENTATION

The potential for significant release from the Buick facility into the environment from sudden and/or accidental causes is minimal. The following breakdown lists the possible causes of a sudden and/or accidental release:

- Releases due to fire in the plant;
- Releases due to plant disruption from utility failure (water or electricity);
- Plant disruption due to process explosion;
- Sabotage resulting in fire or explosion;
- Spills of oil, acid, hazardous waste or contaminated wastewaters; or
- Natural disasters (i.e., tornado, flood, etc.).

The decision to implement the contingency plan depends upon whether or not an imminent or actual incident could threaten human health or the off-site environment. The employee first discovering an actual or potential emergency situation will inform his/her supervisor. The supervisor will notify one of the on-site Emergency Coordinators. The Emergency Coordinator will collect as much information as necessary to determine the seriousness of the situation and the correct response measures.

The coordinator will determine the nature and source of any spilled or leaking material. A check of meteorological conditions (wind, temperature, precipitation, visibility, cloud cover, forecast) which might

affect emergency response procedures will be made by the Emergency Coordinator and logged accordingly in Table 5.

The Emergency Coordinator will make the following evaluations:

- Public health hazards (respiratory, groundwater, surface water, etc.);
- Downwind/downstream hazards;
- Whether or not outside assistance will be required;
- Potential fire and explosion hazards;
- Feasibility and risk involved in cleanup;
- Feasibility of mitigation, i.e., neutralization, berming;
- Suitability and availability of protective clothing and respirator protection;
- Possibility of chemical reactions with incompatible materials.

If the Emergency Coordinator determines that the facility is experiencing an emergency situation which could threaten human health, or impact the environment outside the facility boundaries, the Emergency Coordinator will report finding as follows:

1. If the Emergency Coordinator's assessment indicates that evacuation of local areas may be advisable, the coordinator will immediately notify appropriate local authorities. The Emergency Coordinator will be available to help appropriate officials decide whether local areas should be evacuated; and
2. The Emergency Coordinator will immediately notify either the government official designated as the on-scene coordinator for Iron County Missouri, or the National Response Center (see Table 2) as to the need for an evacuation.
3. Should the release occur from the emergency incident with the potential to cause off-site threats to human health and safety or environmental damage the local fire department has the authority to become the Incident Commander for the emergency situation. When reporting an emergency condition to the above-mentioned authorities, the information listed in the report form as illustrated in Table 3 will be conveyed.

Additionally, the Emergency Coordinator will set up a communications network with all concerned parties. If the situation requires, the Emergency Coordinator will arrange for a qualified person to obtain samples for analysis.

The Emergency Coordinator in coordination with the Incident Commander will determine the optimum cleanup techniques such as neutralization, absorption, mechanical removal, etc. Cleanup efforts will also be monitored by the Emergency Coordinator. Where practical, attempts should be made so that material can be recovered, managed appropriately to regulations and reused in the facility processes.

NOTIFICATION

Whenever there is an imminent or actual emergency situation, the employee first discovering the situation will immediately inform the his/her supervisor.. The supervisor will notify the on-site Emergency Coordinator who will call senior management either directly or through the main office or traffic office. The Emergency Coordinator will then evaluate the situation to determine the need to implement the contingency plan.

If the plan is implemented, the Emergency Coordinator will immediately:

- a. Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel.
- b. Designate an individual, to notify appropriate State or local agencies with designated response roles as needed (see Table 2).

- c. Notifications must be made as soon as practical after discovery of the incident to local emergency responders and to the National Response Center (NRC). While time is limited, at the minimum provide information that an incident has occurred and request an *incident release number* from the NRC. If they will not give you one without a confirmed release, document who you spoke to and when. Inform them additional information will be provided as soon as it can be confirmed.

IDENTIFICATION OF HAZARDOUS MATERIALS

Whenever there is a release, fire, or explosion, the Emergency Coordinator and/or designated representative will immediately attempt to identify the characteristics, exact source, amount, and aerial extent of any released materials. This will be done by observation or review of facility records or manifests, and, if necessary, by chemical analysis. The amount of release may be quantified by known throughput rates of the material (i.e. propane) and reported based on the time elapsed while the material is being released. If this cannot be determined then the entire containerized vessel holding this material may be assumed to have been released and reported accordingly.

ASSESSMENT AND CONTROL PROCEDURES

At the same time, the Emergency Coordinator and/or a designated representative will assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment will consider both direct and indirect effects (e.g., the effects of any toxic, irritating, or asphyxiating gases or fumes that are generated or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions).

The Emergency Coordinator will also ascertain the type of emergency situation by utilizing a “buddy system” approach during this evaluation. At least two individuals must be involved in the hazard assessment of the emergency and assume similar roles as if following confined space entry procedures. If the incident involves a fire or explosion, extreme caution will be used in approaching the scene. Approach to the area will be from the upwind direction so that exposure to vapors, fumes, etc. is minimized and vision is not hampered by drifting smoke. The best approach will be determined and will allow for safe exit from the area by emergency response personnel. A visual survey for downed power lines and live wires will be made. The Emergency Coordinator will make a mental note of debris that might obstruct access by emergency response equipment. Constant communication between the Emergency Coordinator and facility personnel will be maintained.

Plant personnel will be evacuated from the immediate area as necessary to protect their health and welfare. Any casualties will be identified by the Emergency Coordinator, and first aid rendered as soon as possible. Entrance into the affected area will be restricted to those persons equipped with proper protective equipment. Only those persons responding to the emergency will be allowed in the area.

If emergency response equipment is required, a route upwind from the scene will be determined by the Emergency Coordinator. The coordinator will maintain control over the situation to the best of his ability until further assistance arrives as necessary.

The following paragraphs describe general assessment and control of potential emergency response conditions.

Releases Due to Fire in the Plant

While there is potential for fire throughout the plant, the most susceptible areas are the baghouses, the propane storage tank, furnace processes, battery storage and coke storage. Because the BSN process can be shut down without advance notice, interference from processes in these departments is greatly reduced. The furnaces, conversely, may take several hours to bring down safely and efficiently.

If a fire is detected in the baghouse, trained plant personnel should **NOT** open the doors for visual inspection as this allows air into the system and “feeds” the fire. The dampers to the section will be shut to suffocate the fire. In most cases, the fire will die out on its own when the dampers are closed, or at least be greatly reduced by the time a fire fighting crew arrives.

In the event there is a fire in the proximity of the propane tank, the Emergency Coordinator would direct the proper response including wet spraying of the propane storage tank to reduce its temperature. However, priority must be given to a potentially explosive situation. If a propane line were ruptured, the excess flow valve would shut and prevent uncontrolled discharge of propane. In the unlikely event that the propane tank itself were to ignite, the Emergency Coordinator should evacuate the immediate area of response personnel and allow for the fire to burn itself out in the most controlled manner possible.

When a fire is detected, trained plant personnel will immediately contact the Emergency Coordinator and a determination will be made as to whether or not it is safe to use fire extinguishers, or the fire protection system, or whether outside assistance will be necessary. Only those fire situations which can be controlled by fire extinguishing equipment should be used by in-plant personnel. Fires requiring use of high-volume water suppression hoses should be handled by those who have had firefighting training.

The most immediate community concern in potential fire at the Buick facility is airborne toxic material dispersing toward Bixby. The Buick facility maintains appropriate fire suppression systems. Responses to major fires would be conducted by the Quad County Fire Department and other departments as required or their representatives. In the unlikely event that the situation warranted enlisting outside assistance, the Emergency Coordinator would contact the designated local authorities.

Releases Due to Plant Disruption from Utility Failure (Water or Electricity)

The most vulnerable department to utility failure is the blast furnace area since this would result in a loss of power to the ventilation system. In this situation there is a possibility for heat, dust, and gas to accumulate. However, the problem of power loss occurs occasionally and the procedures for orderly shutdown are understood by furnace personnel. There should be no significant impact on the nearby community.

Plant Disruption Due to process Explosion

Most likely location for explosions are in the furnace department or refinery would not affect the community. Damage would be contained within the plant. The Emergency Coordinator will determine and call for the equipment needed to contain any released material.

Sabotage Resulting in Fire or Explosion

See the above paragraphs regarding releases due to fire and plant disruption due to explosion. The response would be no different than if the fire or explosion were due to accidental causes.

Spills of Oil, Acid, or Contaminated Wastewater

The Buick facility has a Spill Prevention Control and Countermeasures Plan which details oil spill response and control. In the event of a spill or leak, the Emergency Coordinator will determine and call for that equipment necessary to contain any released material.

Acid (battery electrolyte) is liberated during battery breaking operations. The acid is collected and stored in one of two tanks designed for this purpose, and is either used in the process or neutralized to produce gypsum. The battery breaking facility has been designed with acid resistant floors and drains (secondary containment). The potential for acid to escape to the environment is extremely low. There is no threat to the local community. Any fugitive spilled acid would be contained within the battery breaking facility. In the event that the acid cannot be contained in a specified area, sand, neutralizing agents, and front-end loaders are readily available. Clean-up water is directed to the wastewater treatment plant. Contaminated materials would be properly containerized, labeled and reprocessed on-site.

. Any stormwater will be captured by upgraded yard drains and routed to the existing wastewater treatment facility for subsequent treatment and discharge. Any run-off generated during emergency response procedures would be captured by yard drains and routed to the wastewater treatment facility.

Natural Disasters (e.g., tornadoes, floods, etc.)

Buick plant personnel are instructed in the proper safety procedures to take in the event of severe weather conditions. The first priority of the Emergency Coordinator will be to check for downed power lines, and other disruptions of utilities. Once the situation allows for safe movement in the plant, response to power outages, fires, or explosions would be the same as outlined above.

PREVENTION OF RECURRENCE OR SPREAD OF FIRES EXPLOSIONS OR RELEASES

During an emergency, the Emergency Coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, reoccur, or spread to other hazardous materials stored at the facility. These measures include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers. If an area of the facility stops operations in response to a fire, explosion, or release, the Emergency Coordinator will designate a specific person to be responsible for monitoring leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

STORAGE AND TREATMENT OF RELEASED MATERIAL

As soon as practical after an emergency, the Emergency Coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from an emergency situation at the Buick facility. Where feasible, the recovered material will be processed through the furnace/refinery operations. Otherwise, a determination will be made as to whether or not the recovered waste, contaminated soil, etc. is classified as a hazardous waste. If so, the material will be disposed of at a licensed hazardous waste landfill.

Any contaminated surface water will be captured and routed to the existing wastewater treatment facility. This facility is designed to handle the 10-year storm runoff in addition to normal plan effluents and its rated capacity is 500 gpm. Firewater, by comparison, will comprise a negligible contribution to the system. Additionally, sufficient freeboard is regularly maintained within the equalization tank to contain firewater. The surge capacity of the wastewater collection system may be up to six million gallons.

INCOMPATIBLE WASTES

During an emergency situation, the Emergency Coordinator will ensure that the affected area(s) of the facility having reactive waste will be properly segregated and protected throughout response and cleanup procedures. The spill procedures and specific SDS identify incompatible materials. For an up-to-date SDS, contact 3E Company, **800-451-8346**.

POST-EMERGENCY EQUIPMENT MAINTENANCE

Any emergency equipment that has been utilized during an emergency response at the Buick facility will be properly cleaned and decontaminated prior to returning to service.

Any equipment used during emergency response procedures will be washed down at designated decontamination stations. These locations will capture and direct rinsate to the existing wastewater treatment facility.

CONTAINER SPILLS AND LEAKAGE

Certain recyclable materials are received at the Buick facility in drums. The material received can be generally described as battery plant manufacturing scrap and may include formed and unformed plates, unused battery oxides, baghouse dust, sump muds, pot drosses (antimony and calcium), and wastewater treatment sludge. These materials are stored in designated areas and pose little or no risk. The only exception would be antimony pot drosses which could be water-reactive. These drums are appropriately labeled and would normally be processed without holding for more than two or three days.

These drums will be stored in a segregated area. Plant personnel are trained in the proper care and handling of these materials. The drums will be stored in an enclosed building with an acid resistant floor. The building is designed with floor drains and sumps so that there is no run-on or run-off from the area. The

potential for a spill or release to the environment or an emergency situation involving these containers which would require implementation of the contingency plan is virtually non-existent.

Any drum that is found to be in poor condition (i.e., severe rusting, apparent structural defects) or found to be leaking will have its contents removed and placed into an appropriate container or processed immediately when appropriate. The materials described above are either chemical reagents or recyclable battery plant scrap (which is exempt from classification as a hazardous waste).

Refining reagent products are also received at the Buick facility in containers. These may include sodium hydroxide, metallic calcium, sodium, antimony, arsenic, and red phosphorous. There is no threat to the local community from the use or storage of these materials due to the storage quantities. Spill response for these chemicals is identified under the *Chemical S.O.P.* sections.

TANK SPILLS AND LEAKAGES

Acid is drained from spent lead-acid batteries and stored in one of two specially designed above-ground tanks for subsequent use or neutralized into gypsum. The tanks are situated within a concrete floor and dike wall so that if there were a leak, rupture or tank failure, the material would be captured and reclaimed through the BSN building. The threat to human health and the environment from these tanks is minimal and would not likely require implementation of the contingency plan. The acid concentration is typically in the range of 15 – 20%.

In the event that there is a leak or spill from the acid tanks or secondary containment dike, or it is determined that a tank is unfit for use, the tank in question would be removed from service by closing appropriate valves and/or locking/tagging out. Necessary repairs would be made before returning the tank to service.

In the event that acid did escape the diked area, absorbent material and/or earth moving equipment would be utilized to prevent further migration. Should this situation arise, any contaminated absorbent material would be properly containerized and reprocessed on-site. Any contaminated run-off from emergency response procedures would be contained by yard drains and routed to the wastewater treatment plant.

For any off-site contamination, notification will be made immediately to the appropriate authorities and property owners depending on the amount released. Additionally, soil and/or water samples may be collected to evaluate the impact from the spill/release.

SURFACE IMPOUNDMENTS

The existing surface impoundment and tank associated with the plant operations are fully designed, built and operated to contain on-site any material spill. Water collected within these structures is either transferred to or captured by the six million gallon equalization tank and then processed in the water treatment plant.

D. EMERGENCY EQUIPMENT

Table 4 lists emergency equipment available at the Buick facility. Equipment available for emergency response includes communication devices, firefighting equipment, emergency showers, eye wash stations, first aid supplies, ambulance (provided by Quad County Rescue Service located in Viburnum, Missouri), earth moving equipment, spill neutralizers, decontamination equipment, and personal protective equipment.

COMMUNICATION DEVICES

A siren is used at the Buick facility as a signal to plant personnel that an emergency situation exists. It is the “muster” signal that alerts the guardhouse staff to be at the ready to request the Quad County Fire Protection District. The siren is manually activated at the in-plant offices.

Hand-held two-way radios allow internal communication within the plant at all times. At a minimum, the following personnel will be assigned a radio: Production & Maintenance Supervisors, Safety Department,

Medical Technician, Traffic Department and Security Guard. The base station of this network is located at the Buick Smelter traffic office. Additional base units may be located in an alternate location(s).

The telephone system at the Buick Facility is used for internal as well as external communications. The telephones are installed at easily accessible locations throughout the plant. The internal phone line system is backed up by a secondary battery source in the event of a power failure and is designed to last 8 to 12 hours on its own. Additionally, the following locations are connected to a dedicated outside line: phone closet, traffic office, and conference room (administration office) and security guard office which could be utilized for outside calls. Supervisors and various salaried employees are allowed to carry cell phones on their person as well.

EMERGENCY WASH STATIONS

Emergency shower and eye wash station locations are listed in Table 4 and should be used for emergency personal use.

FIRE EXTINGUISHERS

Numerous fire extinguishers are placed in appropriate locations throughout the facility. These are 10 and 20-pound models. These models are effective on A, B, and C, type fires. Class D Fire Extinguishers are provided in the Refinery and Drum Shredder areas. The facility's maintenance procedures for fire extinguishers will apply to all fire extinguishers. Each department head has a list of fire extinguishers in that department and they are responsible for inspecting their fire extinguishers on a monthly basis. Monthly inspection reports are submitted to the safety department. A copy of the inspection log is kept at the facility. Each fire extinguisher is checked for proper seal, hose, nozzle, sign, tag, and mounting. Repair parts are kept in stock.

WATER AT REQUIRED VOLUME AND PRESSURE

There are numerous fire hydrants and fire hose boxes located within the Buick facility, with the most recent additions located at the battery receiving and processing facility. Each department is responsible for the fire hydrants and fire hose boxes in each area. A weekly inspection is also conducted. Each hose box contains the following:

- Five lengths of 2-1/2 inch hose (250 feet)
- One hydrant wrench
- Two spanner wrenches
- One straight and one adjustable nozzle

Plant process water is drawn from the adjacent Cominco-American – Magmont Mine to a 250,000-gallon tank located just north of the battery receiving and processing building. By design, 100,000 gallons of this tank are reserved for firefighting. The firewater pump is tested monthly.

The safety department trains employees in the proper use of fire extinguishers and firefighting equipment.

SPILL CONTROL EQUIPMENT

Absorbent material for incidental spills of oil or acid is available in the warehouse, garage and maintenance shop. Absorbent blankets (located in the main lunchroom) and large volumes of sand are also available for larger spills.

For major spills, two large front-end loaders are available for emergency response. These loaders may be located in the operating departments, adjacent to the in-plant lunchroom, near the garage, or near the lab.

Neutralization chemicals will be available at the BSN receiving/warehouse dock. All other spills will be washed with water into the acid recovery system, or to a portion of the plant wastewater collection system for treatment.

E. COORDINATION AGREEMENTS

Arrangements with local authorities regarding potential emergency situations that may arise at the Buick Resource Recycling Facility have been made. Several fire and/or rescue squad members are plant employees and are already familiar with plant operations at the Buick facility. Local authorities, including Salem Memorial Hospital and Quad County Fire Department have toured the facility since the contingency plan was revised in 1994. Additionally, many employees are associates with local volunteer fire departments.

The local authorities are provided with a copy of the contingency plan and have been invited to visit the plant to familiarize themselves with the facility layout and potential emergency situations. Emergency situations will be addressed by trained plant personnel. In the event that a situation arises which requires outside assistance, the Emergency Coordinator, or designate, will contact the appropriate authorities.

F. EVACUATION PLAN

In the event that evacuation from the facility would be necessary, plant personnel would assemble at the changehouse, at the south side of the plant and remain for a head count and further instructions. A continuous audible siren will indicate that the plant should be evacuated. The primary evacuation route to the changehouse is via the main road leading directly to the changehouse. Alternate evacuation routes are via periphery roads on the east and west side of the plant. The attached diagram shows these routes.

G. REQUIRED REPORTS

Within 15 days after an incident requiring implementation of the contingency plan, a written report will be submitted to MDNR and recorded in the operating record accordingly.

LIST OF TABLES

TABLE 1

EMERGENCY COORDINATORS

EMERGENCY COORDINATORS		
NAME/ADDRESS	PHONE NUMBERS	
	OFFICE	HOME
<i>PRIMARY CONTACT</i>		
Genevieve Bodnar Environmental Compliance Supervisor - Metals 2739 County Road 856 Bunker, MO 63629	573-244-8107	573-689-2108
<i>FIRST ALTERNATE</i>		
Justin Province EHS Programs Supervisor 11843 Hwy M Irondale, MO 63648	573-626-3481	573-749-3537
<i>SECOND ALTERNATE</i>		
Vince Wisdom Environmental & Health Technician 2853 Hwy AC Boss, MO 65440	573-626-3340	573-626-4288
<i>THIRD ALTERNATE</i>		
Maggie Crocker EHS Analyst 1256 CR 6080 Salem, MO 65560	573-626-3499	573-453-0114

For 24-hour SDS information, call 3E Company:
1-800-451-8346

IN-PLANT EMERGENCY COORDINATORS

Name	Street Address	City	State	Zip	Office Telephone	Home Telephone #
Joey Crocker	PO Box 251	Lesterville	MO	63654	573-626-3385	573-631-1253
Brad Pryor	98 County Rd 5043	Salem	MO	65560	573-626-3385	573-729-5079
Ted Pryor	PO Box 292	Boss	MO	65440	573-626-3341	573-626-1121

TABLE 2

LOCAL AUTHORITIES

Iron County Deputy Sheriff Viburnum, Missouri	(573) 546-4000
Quad County Volunteer Fire Protection District Viburnum Volunteer Fire Department Highway 49 Viburnum, Missouri 65566	(573) 244-5220
Quad County Ambulance (573) 244-5220 Highway 49 Viburnum, MO 65566	
Salem Memorial District Hospital Highway 72 West Salem, Missouri 65560	(573) 729-6626

GOVERNMENT OFFICIALS

Missouri State Emergency Response Coordinator	(573) 634-2436
Local Emergency Planning Commission	(573) 547-8357
National Response Center	(800) 424-8802
EPA Region VII Emergency Planning and Response Branch	(913) 281-0991

TABLE 3: EMERGENCY RESPONSE REPORT FORM

When reporting an emergency situation at the Buick facility to any of the authorities listed in Table 2, have the following information ready:

- (1) Your name and phone number: _____
- (2) Facility name and address:
The Doe Run Company – Buick Resource Recycling Facility (573) 626-4813
18594 Highway KK, Boss, Missouri
- (3) Time of incident: _____
- (4) Type of incident (e.g. fire, explosion, release): _____
- (5) Name and quality of material(s) involved, to the extent known, report in pounds (For liquids, convert to pounds as follows: gallon amount x specific gravity (refer to SDS) x 8.34): _____

- (6) Extent of injuries, if any:

- (7) Possible hazards to human health or the environment outside the facility: _____

TABLE 4: EMERGENCY RESPONSE EQUIPMENT

- Pea gravel, plastic sheeting and/or absorbent (bulk or in standard size bags)
 - Pea gravel is located at the furnace charging area
 - Absorbent materials and plastic sheeting are stored in the warehouse
 - PPE stored in warehouse and BSN dock area
 - Serve as berms or neutralizing agents
- Front-end loaders
 - Stored at night either in front of garage, in the operating department, or near the lab.
 - * Move large quantities of material for controlling spills or movement of materials
- Dump trucks
 - Parked near lab or in operations area.
 - * Same capabilities as front-end loaders but on a larger scale
- First aid supplies/fire blankets
 - Fire blankets and first aid supplies are located in the first-aid room at the in-plant offices.
- Shower/eye wash stations
 1. Laboratory
 2. Industrial Battery Line
 3. BSN Basement
 4. BSN Filter Press
 5. BSN Paste Separator
 6. Electrolyte Tanks
 7. Antimony Treatment Building Ground Floor
 8. Top of Tanks
 9. East side of Antimony Treatment building (Outside) (2)
 10. Blast Furnace Control Room
 11. Refinery Control Room
 12. Changehouse Respirator Cleaning room.
- Drench Shower
 1. Refinery casting
 2. Reverb control room
 3. In-Plant Offices Foyer
 4. Changehouse
- Portable pumps/hoses
 1. WWTP
 2. Refinery
 3. Warehouse
 - * Transfer of spill/release to a controlled area
- Self-contained breathing apparatus (1 unit each location)
 1. Blast Furnace Feed Floor
 2. Blast Furnace Control Room
 3. First Aid Room (old in-plant lunchroom)
- Portable 4-gas monitor
 1. Blast Furnace Feed Floor
 2. BSN Supervisor Office
 3. Scrubber Control Room
 4. In Plant Supervisors Offices (aka, old main in-plant lunchroom)
 - * Monitors oxygen, CO, H₂S, and Flammability to check for breathable air.

The following equipment is located throughout the facility:

- Hand tools (picks, shovels, etc.)
- Telephones
- Hand-held two-way radios
- Fire extinguishers
- Flashlights
- Portable welders which can be used as 110 V generators in event of power failure

TABLE 5: CONTINGENCY PLAN REPORT FORM

OWNER: The Doe Run Resources Company (314) 453-7142
 1801 Park 270 Drive, Suite 300
 St. Louis, Missouri 63146-4236

FACILITY: Buick Resource Recycling Facility, LLC (573) 626-4813
 18594 Highway KK
 Boss, Missouri 65440-9501

DATE OF
INCIDENT: _____

TIME OF
INCIDENT: _____

TYPE OF
INCIDENT: _____

NAME AND QUANTITY OF MATERIALS

EXTENT OF INJURIES, IF ANY:

ACTUAL OR POTENTIAL HAZARDS TO HUMAN HEALTH OR THE ENVIRONMENT:

WEATHER CONDITIONS TO BE RECORDED:

Wind Direction	Wind speeds
Temperature	Precipitation
Cloud conditions	Visibility
Forecast	

TABLE 6: OSHA PROCESS SAFETY INVESTIGATION REPORT FORM

FACILITY: Buick Resource Recycling Facility, LLC (573) 626-4813
18594 Highway KK
Boss, Missouri 65440-9501

DATE/TIME OF
INCIDENT: _____

INCIDENT INVESTIGATION
DATE: _____

TYPE OF
INCIDENT: _____

DESCRIPTION OF INCIDENT AND CONTRIBUTING FACTORS:

RECOMMENDATIONS, IF ANY:

- * To be completed within 48 hours following the incident.
- * Investigation team shall include refinery, engineering, health, and safety personnel.

CHEMICAL S.O.P.s

ACID SPILLS – PROCEDURE 1

- Sulfuric Acid

CAUSTIC SPILLS – PROCEDURE 2

- Sodium Hydroxide (Caustic Soda)
- Calcium Hydroxide
- Sodium Carbonate

REACTIVE/OXIDIZER SPILLS – PROCEDURE 3

- Oxygen
- Potassium Nitrate
- Sodium and Sodium Compounds
- Red Phosphorous
- Sulfur
- Calcium

FLAMMABLE/COMBUSTIBLE LIQUID SPILLS – PROCEDURE 4

- Solvents
- Fuel Oils

FLAMMABLE/COMBUSTIBLE GAS RELEASES – PROCEDURE 5

- Propane

PCB RELEASES – PROCEDURE 6

IN-PLANT SPILL RESPONSE CHEMICAL S.O.P.s

FOR RESPONSE TO: _____ GO TO: _____

ACID SPILLS	PROCEDURE 1
CAUSTIC SPILLS	PROCEDURE 2
REACTIVE/OXIDIZER SPILLS	PROCEDURE 3
FLAMMABLE/COMBUSTIBLE LIQUID SPILLS	PROCEDURE 4
FLAMMABLE/COMBUSTIBLE GAS RELEASES	PROCEDURE 5
PCB RELEASES	PROCEDURE 6

*** FOR ALL SPILL RESPONSE SITUATIONS, THE FOLLOWING GENERAL CRITERIA SHOULD BE FOLLOWED:**

- 1. Protect Personnel**
- 2. Evaluate Risks (Refer to SDS on 3E website or call 800-451-8346)**
- 3. Stop Source**
- 4. Control Spill Area**
- 5. Notify Authorities if potential to harm human health or the environment exists**
- 6. Notify an Outside Spill Response Contractor, if potential to harm human health or the environment exists**
- 7. Process Spill Material On-Site**

ACID SPILLS – PROCEDURE 1

EMERGENCY ACTION

- Isolate hazard area with yellow tape or orange cones.
- Maintain minimum 500 ft. Distance from spill/leak area – wear butyl rubber suits and SCBA, if necessary, while evaluating situation. Refer to SDS for specific information. Contact 3E Company website or call number below.
- Dike and/or berm spill area with clay soil or absorbents and maintain within plant boundaries. Divert to stormwater collection tank, where feasible.
- When using dilution/neutralization water, do not spray directly on spill, instead allow water to flow with the acid on the ground or apply a light water spray. Discontinue if gassing is visible!!
- Neutralize with lime, caustic soda, or sodium carbonate.

*** IF SPILL/RELEASE CANNOT BE CONTROLLED OR IF SOMEONE HAS BEEN INJURED BY THE RELEASE, INITIATE THE CONTINGENCY PLAN BY THE FOLLOWING:**

- Initiate plant alarm/make radio contacts
- Contact security to stop off-site entrances into the plant
- Evacuate downwind areas where necessary
- If **release exceeds 1000 lbs (~65 gallons) of sulfuric acid** off-site via air, water or land media, or anyone is affected off-site by the incident, verbally contact the following phone numbers within 15 minutes of incident to local responders and within 1 hour to all others (use table 3 for the report):

– 3E Company (24-hr SDS service)	800-451-8346
– Local Emergency Planning Commission	573-547-8357
– State Emergency Response Center	573-634-2436
– National Emergency Response Center	800-424-8802

POTENTIAL HAZARDS

- Corrosive to skin
- SO₂ may be generated at high temperatures
- Adding water may generate hydrogen gas – flammable gas
- Contact with metal or metal containers may also release hydrogen
- Poisonous if swallowed or inhaled

FIRST AID PROCEDURES

- Move individual to fresh air – flush skin/eyes for at least 15 minutes at eye-wash/shower station
- Do not induce vomiting
- **Contact 9-1-573-244-5220 for emergency medical assistance**

CAUSTIC SPILLS – PROCEDURE 2

EMERGENCY ACTION

- Isolate hazard area with yellow tape or orange cones.
- Maintain minimum 500 ft. Distance from spill/leak area. – Wear butyl rubber suits and SCBA, if necessary, while evaluating situation. Refer to SDS for specific information. Contact 3E Company website or call number below.
- Dike and/or berm spill area with clay soil, sand or other absorbents and maintain within plant boundaries. Minimize wind blown caustic powders as much as possible. **Do not use water or caustic powders!!!**

*** IF SPILL/RELEASE CANNOT BE CONTROLLED OR IF SOMEONE HAS BEEN INJURED BY THE RELEASE, INITIATE THE CONTINGENCY PLAN BY THE FOLLOWING:**

- Initiate plant alarm/make radio contacts
- Contact security to stop off-site entrances into the plant
- Evacuate downwind areas where necessary
- **If release exceeds 1000 lbs of sodium hydroxide (caustic soda)** off-site via air, water, or land media, or anyone is affected off-site by the incident, verbally contact the following phone numbers within 15 minutes of incident to local responders and 1 hour to all others (use table 3 when making the report):

– 3E Company (24-hr SDS service)	800-451-8346
– Local Emergency Planning Commission	573-547-8357
– State Emergency Response Center	573-634-2436
– National Emergency Response Center	800-424-8802

POTENTIAL HAZARDS

- Corrosive to skin – phosgene may be generated when mixed with phosphorous = highly toxic
- Adding water may generate heat
- Contact with metals may generate hydrogen gas = flammable
- Poisonous if swallowed or inhaled
- Mixing with acids may cause violent reaction

FIRST AIR PROCEDURES

- Move individual to fresh air – flush skin/eyes for at least 15 minutes at eye wash/shower station
- Do not induce vomiting
- **Contact 9-1-573-244-5220 for emergency medical assistance**

REACTIVE/OXIDIZER SPILLS – PROCEDURE 3

EMERGENCY ACTION

- Allow gas cylinders to release contents before approaching area.
- Dike and/or berm spill area with absorbents/sand and maintain within plant boundaries. Divert to stormwater collection tank, where feasible.
- For a fire spray tanks with water to prevent explosions, if no leak has occurred.
- Use water spray, fog, or regular foam to fight a fire
- Wear SCBA and butyl rubber suits when fighting fires if a leak has occurred.
- Continue spraying tanks with water well after a fire has occurred.
- Once any fire is out, treat as spill and continue using SOP guidelines.
- Refer to SDS for complete fire hazard data. Contact 3E website of phone number below.
- **Do not use water on sodium.** – isolate or reduce temperature on heat sources (i.e. Kettles, torches).
Remove flammable liquid/gas sources (i.e. Propane).
- Ventilate away from plant personnel, evacuate where necessary. Use sodium hydroxide (caustic soda) or lime as a neutralizing agent for liquid sodium bicarbonate as extinguishing media for sodium fire.

*** IF SPILL/RELEASE CANNOT BE CONTROLLED OR IF SOMEONE HAS BEEN INJURED BY THE RELEASE, INITIATE THE CONTINGENCY PLAN BY THE FOLLOWING:**

- Initiate plant alarm/make radio contacts
- Contact security to stop off-site entrances into plant
- Evacuate downwind areas where necessary
- If **release exceeds 10 lbs of sodium or any gas release** off-site via air, water, or land media, or anyone is affected off-site by the incident, verbally contact the following phone numbers within 15 minutes of incident to local responders and within 1 hour to all others (use table 3 for the report):

– 3E Company (24-hr SDS service)	800-451-8346
– Local Emergency Planning Commission	573-547-8357
– State Emergency Response Center	573-634-2436
– National Emergency Response Center	573-424-8802

POTENTIAL HAZARDS

- Corrosive to skin
- Poisonous if swallowed or inhaled
- Sodium mixed with water generates hydrogen gas = explosive
- Strong oxidizer

FIRST AID PROCEDURES

- Move individual to fresh air
- Flush skin/eyes for at least 15 minutes
- Do not induce vomiting
- **Contact 9-1-573-244-5220 for emergency medical assistance**

FLAMMABLE/COMBUSTIBLE LIQUID SPILLS – PROCEDURE 4

EMERGENCY ACTION

- Isolate hazard area with yellow tape or orange cones
- Maintain minimum 500 ft. Distance from spill/leak area
- **Shut off all ignition sources** – wear butyl rubber suits and SCBA, if necessary, while evaluating situation
 - refer to SDS for specific information, see 3E website or call number below.
- Dike and/or berm spill area with clay soil, sand, or absorbents and maintain within plant boundaries. **Do not** divert to stormwater collection tank.
- Use ABC fire extinguishers and/or #150 units for fire suppression

*** IF SPILL/RELEASE CANNOT BE CONTROLLED OR IF SOMEONE HAS BEEN INJURED BY THE RELEASE, INITIATE THE CONTINGENCY PLAN BY THE FOLLOWING:**

- Initiate plant alarm/make radio contacts
- Contact security to stop off-site entrances into the plant
- Evacuate downwind areas where necessary
- Contact **fire department 573-244-5220** for outside assistance – if anyone is affected off-site by the incident, verbally contact the following phone numbers within 15 minutes of incident for local responders and within 1 hour for all others (use Table 3 when making the report):

- | | |
|---------------------------------------|-------------------------------------|
| – 3E Company (24-hr SDS service) | 800-451-8346 |
| – Local Emergency Planning Commission | 573-547-8357 |
| – State Emergency Response Center | 573-634-2436 |
| – National Emergency Response Center | 800-424-8802 |
| – U.S. Forest Service | 573-364-4621 or 573-364-6394 |

POTENTIAL HAZARDS

- Skin Burns
- Smoke Inhalation
- Chemical Inhalation

FIRST AID PROCEDURES

- Do not apply ointments, ice, or salt water directly to burns
- Do not remove adhered clothing from burn area
- Keep wound covered and clean
- **Contact 9-1-573-244-5220 for emergency medical assistance**

FLAMMABLE/COMBUSTIBLE GAS RELEASES – PROCEDURE 5

EMERGENCY ACTION

- Evacuate hazard area (propane tank farm) to minimum 2000 ft. Distance
- Evacuate building area where propane line is disconnected
- Observe wind conditions and patterns
- De-energize all potential ignition sources (i.e. Electrical wires, vehicles, transformers)
- Use combustion gas indicators to detect propane leaks beyond 2000 ft. Distance or building areas

- **IF SPILL/RELEASE CANNOT BE CONTROLLED OR IF SOMEONE HAS BEEN INJURED BY THE RELEASE, INITIATE THE CONTINGENCY PLAN BY THE FOLLOWING:**

- Initiate plant alarm/make radio contacts
- Contact security to stop off-site entrances into the plant
- Evacuate downwind areas where necessary
- If anyone is affected off-site by the incident, verbally contact the following phone numbers within 15 minutes of incident to local responders and within 1 hour to all others (use table 3 when making the report):

– 3E Company (24-hr SDS service)	800-451-8346
– Local Emergency Planning Commission	573-547-8357
– State Emergency Response Center	573-634-2436
– National Emergency Response Center	800-424-8802

*** FOR MINING OPERATIONS WHICH COULD POTENTIALLY BE IMPACTED DIAL THE FOLLOWING NUMBERS:**

- SEMO SECURITY - (Westfork) 573-244-4200

POTENTIAL HAZARDS

- Violent Explosion = Metal Projectiles
- Severe Burns
- Building Collapse

FIRST AID PROCEDURES

- Do not apply ointments, ice, or salt water directly to burns
- Do not remove adhered clothing from burn area
- Keep wound covered and clean
- **Contact 9-1-573-244-5220 for emergency medical assistance**

PCB SPILLS – PROCEDURE 6

EMERGENCY ACTION

- Isolate hazard area with yellow tape or orange cones
- Maintain minimum 500 ft. Distance from spill/leak area
- Wear butyl rubber suits and SCBA, if necessary, while evaluating situation. Refer to SDS for specific information.
- Dike and/or berm spill area with clay soil, sand, or absorbents and maintain within building area
- Contact environmental compliance supervisor, if not available, contact Reidel Environmental Services (St. Louis) at 314-532-7660 or 1-800-334-0004 and report PCB spill using Table 3 Form.

*** IF SPILL/RELEASE CANNOT BE CONTROLLED OR IF SOMEONE HAS BEEN INJURED BY THE RELEASE, INITIATE THE CONTINGENCY PLAN BY THE FOLLOWING:**

- Initiate plant alarm/make radio contacts
- Contact security to stop off-site entrances into plant
- Evacuate downwind areas where necessary
- If release exceeds 1-lb off-site via air, water, or land media, or anyone is affected off-site by the incident, verbally contact the following phone numbers within 15 minutes of incident to local responders and within 1 hour to all others (use Table 3 when making the report):

- | | |
|---------------------------------------|---------------------|
| – 3E Company (24-hr SDS service) | 800-451-8346 |
| – Local Emergency Planning Commission | 573-547-8357 |
| – State Emergency Response Center | 573-634-2436 |
| – National Emergency Response Center | 800-434-8802 |

POTENTIAL HAZARDS

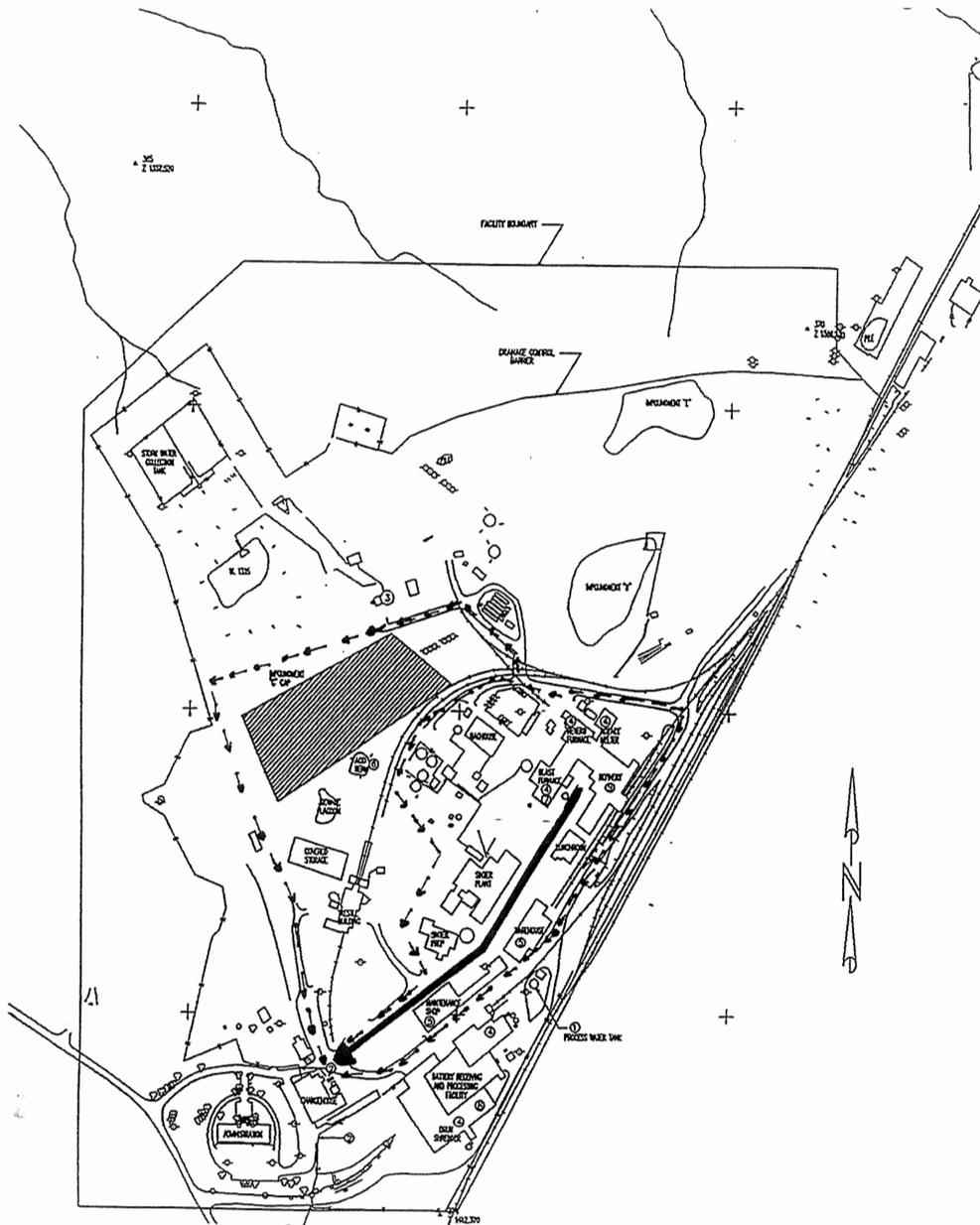
- Poisonous if swallowed or inhaled
- Skin irritation

FIRST AID PROCEDURES

- Move individual to fresh air
- Contact **9-1-244-5220** for emergency medial assistance

EVACUATION ROUTES

 = Primary
 = Secondary



- LEGEND**
- | | | | |
|---|-----------------------------------|---|---------------------------|
|  | Sidewalk |  | Spot Elevation |
|  | Building |  | Single Tree |
|  | Foundation |  | Located Object |
|  | Fence |  | Catch Basin |
|  | Wall |  | Manhole |
|  | Sluice |  | Pole |
|  | Index Contour |  | Spot |
|  | Guard Rail |  | Railroad |
|  | Swamp Symbol |  | Paved Road |
|  | Control Point |  | Unpaved Road |
|  | PROCESS WATER TANK |  | Inlet |
|  | EMERGENCY FIRE ALARM, DIESEL PUMP |  | Fire Hydrant |
|  | ACCESS GATES |  | Light Pole |
|  | WASTE WATER TREATMENT FACILITY | | |
|  | RESOURCE RECOVERY UNIT | | |
|  | SPILL CONTROL EQUIPMENT | | |
|  | ACID SPILL CONTAINMENT BERM | | |
|  | HAZARDOUS WASTE PROCESSES | | |
|  | HAZARDOUS WASTE STORAGE | | |
|  | RECLAIMED PRODUCT STORAGE |  | RECLAIMED PRODUCT STORAGE |

NOTE: Plan detail (auto plot) from photogrammetric digital data. Contours were compiled as digital string data directly from the stereo plotter (string formed by X, Y, Z coordinates).

PHOTODIAMETRIC MAP	
Prepared for:	
Doe Run Company	
Scale: 1=200	Contour Int.: 5'
Control Datum: Hor.	Photo Date: 3-28-85
	Ver. 2

THE
DOE RUN
COMPANY
 RESOURCE RECYCLING DIVISION

FIGURE 2 BUICK FACILITY DRAWING