

SECTION 5

**PLAN OF OPERATIONS IS DESIGNED TO
MINIMIZE DANGER TO SURROUNDING
AREA FROM FIRES, SPILLS, OR OTHER
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5

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Overview

Criterion 5 of Section 39.2 of the Illinois Environmental Protection Act and of the City of Zion Pollution Control Facility Siting Ordinance requires the plan of operations for the facility be designed to minimize the danger to the surrounding area from fire, spills, or other operational accidents.

Veolia ES Zion Landfill, Inc. (Veolia) has developed a comprehensive site operating plan described in Section 2.6 of this application which is designed to ensure safe operations and to protect the public health, safety and welfare. In addition to the operating plan, Veolia has developed an Emergency Preparedness Program, an Emergency Response Plan, and numerous Health and Safety policies that emphasize site safety training and proper safety procedures during day-to-day operations and during emergency situations. The Emergency Preparedness Program and site policies are included in Appendix T of this application. The Veolia plans, policies, and programs in Appendix T are subject to change to improve operational health and safety. These plans, programs, and policies have been developed to minimize the potential for fires, spills, and other accidents, and outline the responses and procedures to be followed in the event that such incidents do occur.

Site Safety Procedures

Veolia is committed to promoting health and safety awareness. Veolia has developed its health and safety programs to ensure that employees, contractors, and visitors are trained and are aware of safe construction, operating, and emergency procedures at the site. They also enable employees, contractors, and visitors to recognize potential site hazards and minimize the possibility for accidents. Supervisors, and employees, contractors, and visitors will be required to follow proper safety procedures while at the Facility. Veolia regularly conducts safety and compliance inspections to ensure that its policies are followed at the Facility. A copy of the Safety and Compliance Inspection Policy is included in Appendix T.

Safety Training

Employees will be made aware of specific hazards associated with the position they maintain at the Facility. Each employee will be provided with information explaining site safety measures. Training for new positions will provide the employee with an overview of site and work hazards, as well as a means to help control those hazards. The following list describes information to be provided during a typical training program.

- Safe work practices;
- Nature of anticipated hazards;
- Handling of emergencies;
- Appropriate vehicle, machinery and equipment use;



Veolia will establish and communicate the corporate safety policies throughout the company and provide the leadership necessary for the continuation of proper safety techniques to

minimize the risk of hazards in the workplace. Safety meetings will be held on a regular basis to ensure that the safety plan is being followed. Veolia's Employee Safety Observation Policy is provided in Appendix T.

Machinery Safety

Employees who are in contact with operating machinery will be aware of proper operating procedures for the safe use of the equipment. Employees will be required to follow the proper operating procedures while maintaining and operating the equipment on site in a safe manner. Unsafe equipment will not be used and will be repaired or replaced as soon as possible. Veolia employees will be trained in the importance of minimizing driver/operator distractions and the use of seatbelts. The Driver/ Operator Distraction Policy and Seatbelt Use Policy are provided in Appendix T.

Personal Protective Equipment

The use of appropriate personal protective equipment will be required for personnel involved in operations where exposure to dangerous conditions could occur or where such equipment is needed to reduce hazards. Employees performing work near the active face of the landfill or within the tipping area will wear the following equipment as necessary: steel-toed work shoes or boots, high visibility clothing, appropriate hearing protection (when work environment noise levels require protection), and appropriate protective attire (such as head, eye and hand protection). Veolia's Personal Protective Equipment Policy is provided in Appendix T.

Confined Space Entry

In the event that a confined space entry must occur, proper notification procedures will be followed to help ensure that accidents do not occur at the Facility. Potential confined spaces at this site include leachate riser vaults and leachate storage tanks and manholes. The Confined Space Entry Safety Program is provided in Appendix T.

Lockout/Tagout Program

The Facility will maintain a program and procedures for affixing appropriate lockout devices or tagout devices to energy isolating components and equipment in order to prevent unexpected energization, start-up or release of stored energy to prevent injury to employees. During shift changes, these procedures will apply to verify the continuity of lockout or tagout protection when continued maintenance, repair, or testing will be performed on equipment. The Lockout/ Tagout Program is included in Appendix T.

Vandalism

In the event that vandalism occurs, Veolia will determine if the vandalism will adversely affect any machinery or process associated with the object vandalized. If the machinery will not run safely as a result of the vandalism, the object will be locked out of use until properly repaired.

Materials Handling and Use

Veolia will maintain materials on-site for use in the maintenance and cleaning of the site, equipment, and office areas. Materials will be stored and secured as necessary to prevent them from blowing, falling, sliding, or collapsing. Walkways and aisles will be kept clear, and boundaries of lay down areas will be neat and orderly. Materials used at the facility for maintenance and cleaning will be located in a safe manner so that leaks, spills, and



accumulated precipitation is prevented. Veolia maintains a Hazard Communication Written Program to inform employees of the potential hazards associated with the materials that may be utilized on-site. A copy of the Hazard Communication Written Program is included in Appendix T.

Liquid containers may be situated either on a sloped base or elevated (such as on pallets) to protect the container base from wear. Spills or leaks of oil, cleaning material, etc. will be cleaned up and properly disposed of in a timely manner. If the container is not in good condition (e.g., severe rusting, corrosion, etc.) or if it is not operational, the material will be transferred to a container in good condition.

Materials stored in tiers will be stacked, racked, blocked, interlocked or otherwise secured to prevent toppling of the material. Aisles and passageways near these areas will be kept clear. Incompatible materials will be separated in storage. General housekeeping will be completed on a regular basis to keep areas free of materials to lessen the potential for accidents. Flammable or combustible liquid storage shall comply with applicable regulatory requirements. Equipment will be fueled through funnels or spouts to prevent spills and equipment motors will be shut off during fueling operations.

Spill Prevention and Control

The Facility has developed a written Spill Prevention Control and Countermeasures (SPCC) Plan. This plan identifies materials at the site which have the potential to spill and outlines the responses and procedures to be followed in the event of a spill at the Facility. A copy of this SPCC Plan is provided in Appendix R.

Load Checking Program

A detailed program describing the inspection of incoming loads is provided in the Load Checking portion of Section 2.6 of this application. The program will be implemented at the beginning of site operations to increase site safety by preventing the disposal of unauthorized waste at the Facility. Unauthorized waste includes any hazardous and/or unpermitted solid or liquid wastes. The daily load checking program will include an inspection of waste prior to being deposited within the Facility. Load checking will occur to varying degrees at the curbside, scalehouse, and active face, as well as during waste compaction activities.

In addition to inspections at the regular checkpoints, inspections will occur in three random loads of solid waste delivered to the Facility on a random day each week, or as approved by the IEPA. Employees involved in the daily load checking program will be trained for the identification of hazardous and unauthorized waste. Furthermore, personal protective equipment will be available for use as necessary in order to ensure personal safety and prevent direct contact with any hazardous substances. Incoming loads will also be observed for flames, smoke, or odor typical of a "hot" load (a load with burning or smoldering waste). Early detection prior to unloading at the waste site will prevent the "hot" load from spreading to the active area.



Fire Prevention

Numerous design features and operating procedures will be employed at the Facility to decrease the potential for fires. Smoking will be restricted to designated areas. A load checking program will be implemented to detect and prevent the disposal of unauthorized wastes including "hot" loads of waste. Cleaning and maintenance materials used at the site will be appropriately labeled and stored, and adequate separation will be provided from heaters or other potential ignition sources. Routine maintenance will be performed on equipment to assure that it is in good working order. Adequate setbacks will be provided between fuel tanks and buildings.

Additionally, the Zion Fire Department conducts site visits to review the facility layout, contingency plans, and possible evacuation routes. The Zion Fire Department is sufficiently equipped, staffed, and trained to handle fires, spills, and operational accidents which might occur at the Facility. Documentation of the most recent visit and topics discussed is provided in Appendix T.

General Landfill Development Procedures

The three basic phases of developing a landfill consist of construction, operation, and post-closure care. Applicable safety procedures will be strictly followed through each phase of landfill development. The following provides a number of steps designed to help minimize hazards that may be present during the three phases of the landfill development.

Site Construction

Initial site construction and development includes such projects as the excavation of disposal areas, construction of earth berms, erection of buildings, installation of roads, fences, monitoring points, culverts, landscaping, and various other tasks in preparation for waste acceptance. This work will be completed by Veolia site personnel and possibly in part by contractors hired to perform specific services. Below is a list of steps that will be taken during development to increase site safety:

- Access will be controlled by a perimeter fence with locking gates at entrances, as well as natural barriers such as trees, berms, ditches, wetlands and other landscaping. These natural and constructed barriers will discourage unauthorized access to the facility;
- Electrical and telephone service will be available to provide security lighting and emergency communications;
- Mud tracking off site will be minimized by providing all weather access roads within the Facility. Site personnel will keep the paved portions of the road clean and/or a street sweeper will be used to keep paved roads clean and clear of mud; and
- Loading or unloading of trucks will be performed in a safe manner.



Site Operations

The active site operating period extends from commencement of waste acceptance through the date of final closure. During this time, vehicles bearing waste materials will enter and leave the site. Precautions will be taken so that accidents do not result from the traffic and regular operations occurring at the Facility. Section 2.6 of this application provides a detailed description of the operating procedures at the site. Below is a list summarizing steps to take to help ensure safe operations at the Facility.

- During dry weather, unpaved roads will be watered as necessary to minimize dust from operations;
- Signs describing site access, directional information, and speed limits will be posted along access roads to control traffic at the Facility;
- Vehicles entering the Facility will be observed by the operator for any unsafe conditions;
- Load inspections will be performed by the operator to identify unacceptable material (see Load Checking portion of Section 2.6);
- Unauthorized pedestrian traffic over uncovered areas will not be permitted. Vectors will be controlled by compacting the waste material and placing soil or an approved alternate cover material over completed portions of the working area;
- Smoking will not be permitted at the Facility, except within designated areas; and
- A courtesy drop off area is provided for smaller vehicles to dispose of wastes without having to drive onto the active face of the landfill.

Post-Closure

The site operator is required to maintain and monitor the site under current regulations for a period of at least thirty (30) years after closure of the landfill. During this period, the site will occasionally require work by end loaders, trucks, dozers, and other pieces of heavy equipment. The site safety and operating procedures in place during the site's operating life will be followed during the post-closure period as well.

Emergency Preparedness Program

Veolia has developed an Emergency Preparedness Program that describes procedures to respond to workplace emergencies. A workplace emergency is an unforeseen situation that threatens employees, customers, or the public; disrupts or shuts down operation; or causes physical or environmental damage. Types of workplace emergencies are outlined in the Emergency Preparedness Program. The program also addresses general emergency response measures including first-aid and evacuation. A copy of the Emergency Preparedness Program is provided in Appendix T.



Emergency Response

Medical Services and First-Aid

First-aid supplies will be located at the main office and maintenance building. Kits will be checked on a regular basis to ensure that they are adequately supplied.

In case of personal injury, the General Manager will be notified as soon as possible. If the injury is minor, first aid or emergency medical treatment will be applied as necessary. Professional assistance will be requested in cases where more than simple first aid is required by dialing 911. The injured party will be taken to a hospital or other medical facility for observation, if warranted. If the injury is major or indeterminate, the hospital or other medical facility will be immediately notified and an ambulance or other emergency unit will be summoned. A person will be designated to stand to flag emergency vehicles at the entrance and direct them to the injured person. The Accident and Claim / Safety Reporting Policy is provided in Appendix T.

Fires

Each piece of heavy equipment will be equipped with a multi-purpose fire extinguisher. Soil and heavy equipment is also readily available onsite to extinguish small fires that cannot be controlled with fire extinguishers. Multi-purpose fire extinguishers will also be strategically located within each on-site building. The Portable Fire Extinguishing Training policy is provided in Appendix T.

In the event of a fire, employees will extinguish the fire if possible without risk of personal injury. Operators will be notified by the Emergency Response Coordinator to take appropriate action. Notification procedures are outlined in the Emergency Preparedness Program.

Explosions

The Emergency Preparedness Program provides guidelines to follow in the unexpected event of an explosion. These guidelines include following instructional warnings, taking appropriate shelter, and minimizing contact with debris. Explosions from the disposal of waste are not expected due to the types of wastes received at the Facility and the Facility load checking program. Fuels are also maintained in approved tankage systems and are kept in small quantities, further reducing the risk.

Severe Weather

Response actions for severe weather conditions are highly variable and depend on the nature and severity of the event. In the event that the Facility has received warning of a potential severe weather, the Emergency Response Coordinator will warn site personnel and proper shelter will be taken immediately. The Emergency Response Coordinator will also notify employees with an all-clear weather condition.

Chemical and Hazardous Waste Spill

Should a spill occur at the Facility, employees will be trained in proper reaction procedures. If safe to do so, the source of the spill will be stopped to the extent possible. Small quantities of oil products, fuel, anti-freeze, and paint may be cleaned using floor-dry or other absorbent material.



If necessary, containment structures will be constructed. The spilled material will be collected and containerized to the extent possible, and any contaminated soil will be removed and properly disposed of.

In the event that a reportable quantity of hazardous substance is spilled at the Facility, the landfill operator will complete the notification requirements in accordance with 40 CFR 302.6. Veolia will also notify the community Emergency Response Coordinator, IEPA and City personnel of any adjacent areas which could be affected by the release. A complete copy of the Facility's SPCC Plan is included in Appendix R.

Terrorist Attacks

While a terrorist attack is unlikely at the Facility, terrorism by its nature is unpredictable. Due to the wide range of threats that terrorism may include, Veolia has only developed general shelter and survival techniques for such an activity. It is important that employees monitor television or radio news reports for information or official instructions as they become available.

Refer to the Emergency Preparedness Program on shelter techniques that may be implemented in the event of a nuclear blast, dirty bomb, chemical threat, and blackout.

Bloodborne Pathogen Exposure

Veolia will maintain bloodborne pathogen spill kits and sharps containers. Only employees trained in the use of these kits and containers will be permitted to use them. Veolia maintains a Bloodborne Pathogen Exposure Control Program, which is included in Appendix T.

Conclusion

Considering the design and plan of operations for the Facility described under Criterion 2 of this Application, as well as the additional procedures outlined in the plans, programs, and policies identified above, the plan of operations for the Facility is designed to minimize the danger to the surrounding area from fires, spills, or other operational accidents, meeting the requirements of Criterion 5.

