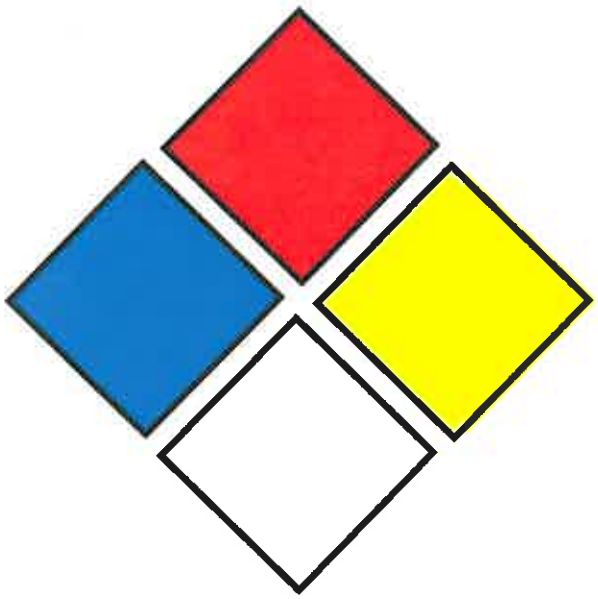
J.H. BAXTER & CO.
EUGENE, OREGON

HAZARDOUS MATERIALS MANAGEMENT PLAN
EMERGENCY RESPONSE/CONTINGENCY PLAN

Flammability
4 extremely flammable
3 highly flammable
2 flammable
1 low flammability
0 not flammable

Health Hazard
4 extremely hazardous
3 moderately hazardous
2 hazardous
1 slightly hazardous
0 not hazardous



Reactivity Hazard
4 Severe explosion risk
3 explosion risk
2 potentially explosive
1 not violently reactive
0 normal stability

Specified Hazard

OXY	oxidizer
ACID	acid
ALK	alkali
COR	corrosive
W	Use no water

Rev 07/23/2013

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Revision Date: 07-26-2012

I. GENERAL PLAN INFORMATION

This Plan, prepared for the J. H. Baxter & Co. Eugene Facility, incorporates all federal, state and local requirements for Hazardous Materials Management, Emergency Release Planning and Notification and Contingency Plans.

1.0 The plan fulfills 29 CFR 1910.38 requirements for an Emergency Action Plan by:

- 1.1 Establishing procedures for an emergency evacuation of the plant.
- 1.2 Establishing procedures to follow for emergency operation of critical equipment before evacuation.
- 1.3 Explaining procedures to account for all employees after evacuation.
- 1.4 Explaining employee responsibilities for emergency rescue and medical aid.
- 1.5 Establishing procedures for reporting a fire or any other emergency.
- 1.6 Giving names and titles of people who can be reached for further information.

2.0 29 CFR 1910.39 requirements for a fire prevention plan is also covered in this plan by:

- 2.1 Identifying fire hazards at the plant.
- 2.2 Explaining procedures used to control accumulation of flammable materials.
- 2.3 Explaining procedures for maintaining heat-producing equipment.
- 2.4 Listing job-titles of employees responsible for maintaining equipment used to prevent and/or control sources of ignition and fire.
- 2.5 Listing job-titles of employees responsible for control of fuel source hazards.

3.0 The plan also incorporates all federal, state and local requirements for Hazardous Materials Management, Emergency Release Planning and Notification and Contingency Plans.

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
CERCLA regulations require facilities to immediately notify the National Response Center, in accordance with 40 CFR 302, when there is a release of a hazardous substance in an amount greater than the reportable quantity for that hazardous substance.

Emergency Planning and Community Right-to-Know Act (EPCRA)
EPCRA regulations require facilities to notify State Emergency Response Commissions and Local Emergency Planning Committees of releases of hazardous and extremely hazardous substances greater than or equal to the reportable quantity, in accordance with 40 CFR 355.

Contingency Plan
The contingency plan, incorporating written plans and procedures, shall describe the actions that will be taken by the facility, in the event of an emergency.

II. SITE INFORMATION

Business Name:	J.H. Baxter & Co.
Business Address:	85 N. Baxter Road Eugene, OR 97402
Business Phone:	(541) 689 - 3801
Business Fax:	(541) 689 - 8303
Primary Contact:	Jeanne Olson Plant Manager
Secondary Contact:	Scott Thielke Environmental Manager
Type of Business:	Wood Preserving
SIC Code:	2491
EPA ID Number:	ORD009032400

CORPORATE INFORMATION

Business Owner Name:	J.H. Baxter & Co.
Owner Address:	1700 South El Camino Real PO Box 5902 San Mateo, CA 94402
Owner Phone:	(650) 349 - 0201
Owner Fax:	(650) 570 - 6878
Primary Contact:	RueAnn Thomas Owner-Representative
Secondary Contact:	Georgia Baxter President

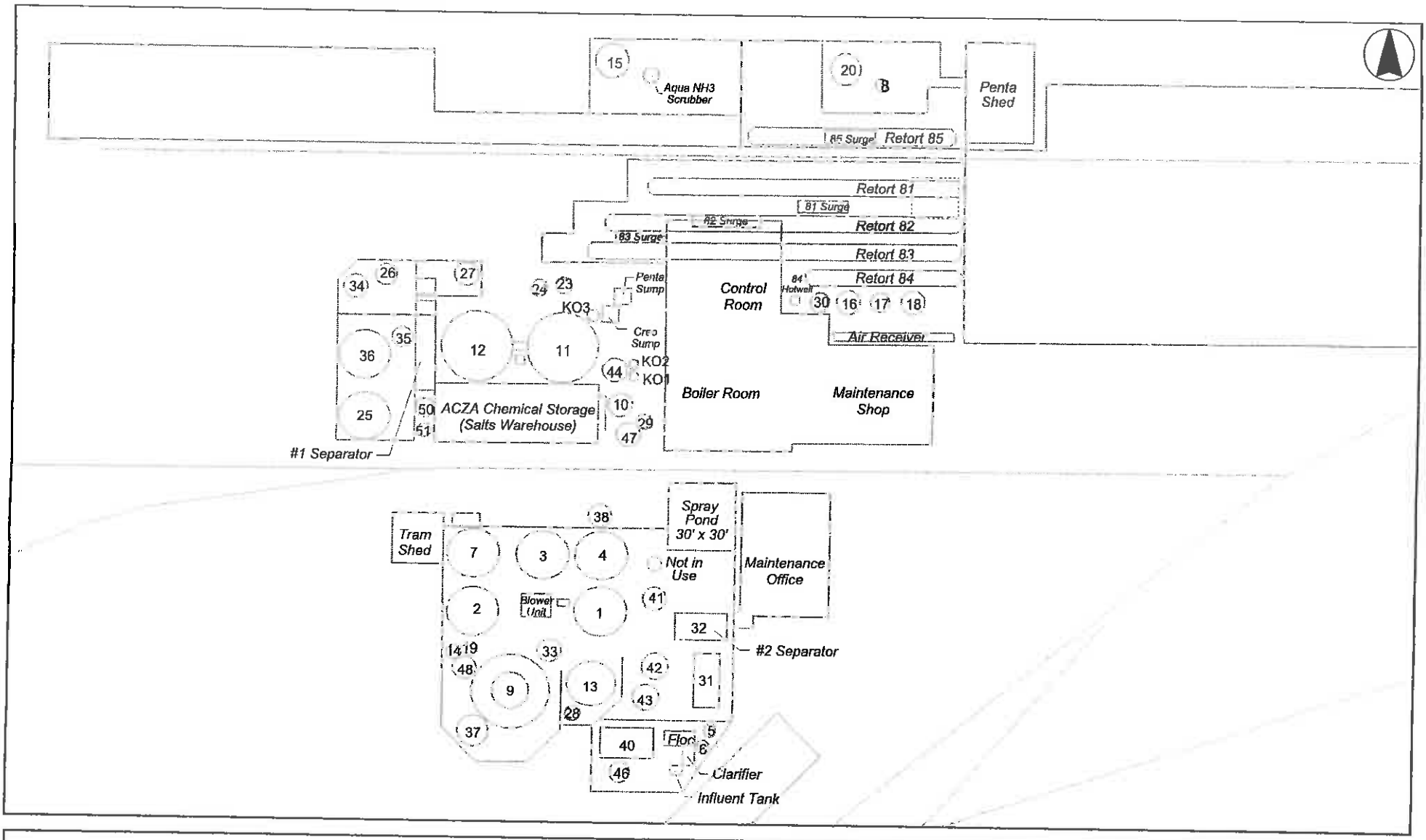
III. HAZARDOUS MATERIALS INVENTORY

- TANK INVENTORY
- TANK FARM MAP

Revised 9/1/09

Chemical Tank Inventory
Eugene, OR

Tank No.	Capacity (gals)	Contents
1	32,740	Penta Base Oil or PCP-A
2	53,116	Creosote/50-50
3	56,134	Creosote/50-50
4	74,845	Creosote/50-50
5	500	Aluminun Sulfate
6	500	Sodium Hydroxide
7	53,977	Creosote/50-50
9	71,561	PCP-A solution
10	11,630	ACZA Mix Tank
11	57,422	ACZA Work solution
12	57,178	ACZA Work solution
13	80,540	Tank Farm Rainwater
14	5,000	Tank Farm Rainwater
15	13,915	Aqua Ammonia
16	14,708	ACQ Work solution
17	14,676	ACQ Work solution
18	14,931	Copper Oxide solution (ACQ)
19	6,943	Tank Farm Rainwater
20	63,079	Not in Use
21	10,196	Fiberglass (boneyard)
22	10,203	Fiberglass (boneyard)
23	4,901	ACZA Recovery water
24	19,225	ACZA Closed Steam Tank
25	58,764	ACZA Work solution
26	19,225	PCP-A Recovery
27	19,225	50/50 Recovery
28	3,000	J-Press Discharge (penta floc)
29	1,018	City Water Storage (wooden tank)
30	1,500	ACQ Scrubber Water
31	12,325	Not in Use
32	12,447	#2 Separator
32-A	825	#1 Separator
32-B	3,000	Oil Water Separator
33	23,110	Penta Base Oil/Diesel
34	12,150	ACZA Work solution
35	5,454	Arsenic Acid
36	58,776	ACZA Concentrate
37	12,195	Diesel (for equipment)
38	7,668	Not in Use
39	2,700	Not in Use
40	6,100	Evaporator Water Tank
41	20,000	Recovery Water (A) floc
42	20,000	Recovery Water (B) floc
43	20,000	Recovery Water (C) floc
44	20,000	clean water for scrubber
45	8,000	Tank Farm Rainwater
46	7,500	Tank Farm Rainwater (Apollo 13)
47	15,000	Boiler Makeup Water
48	5,000	Lignon Sulfonate (dust control)
49	240	ACZA Vac Pump Knockout
50	N/A	Washing Ring Scrubber Tank (ACZA mixing)
51	2,154	Vapor Phase Carbon Vessel
N/A	30,500	Spray Pond at float level
Clarifier Tank	700	Process Water Treatment
Influent Tank	100	Process Water Treatment
Floc Tank	1,000	Process Water Treatment
#1 Knockout	423	Creo 50/50 Vac Pump
#2 Knockout	423	Penta Vac Pump
3# Knockout	423	Penta Vac Pump
Carbon Tank	575	Treatment System Carbon Vessel #1
Carbon Tank	575	Treatment System Carbon Vessel #2



Facility Process Map - JH Baxter - Eugene, Oregon

IV. FACILITY MAPS

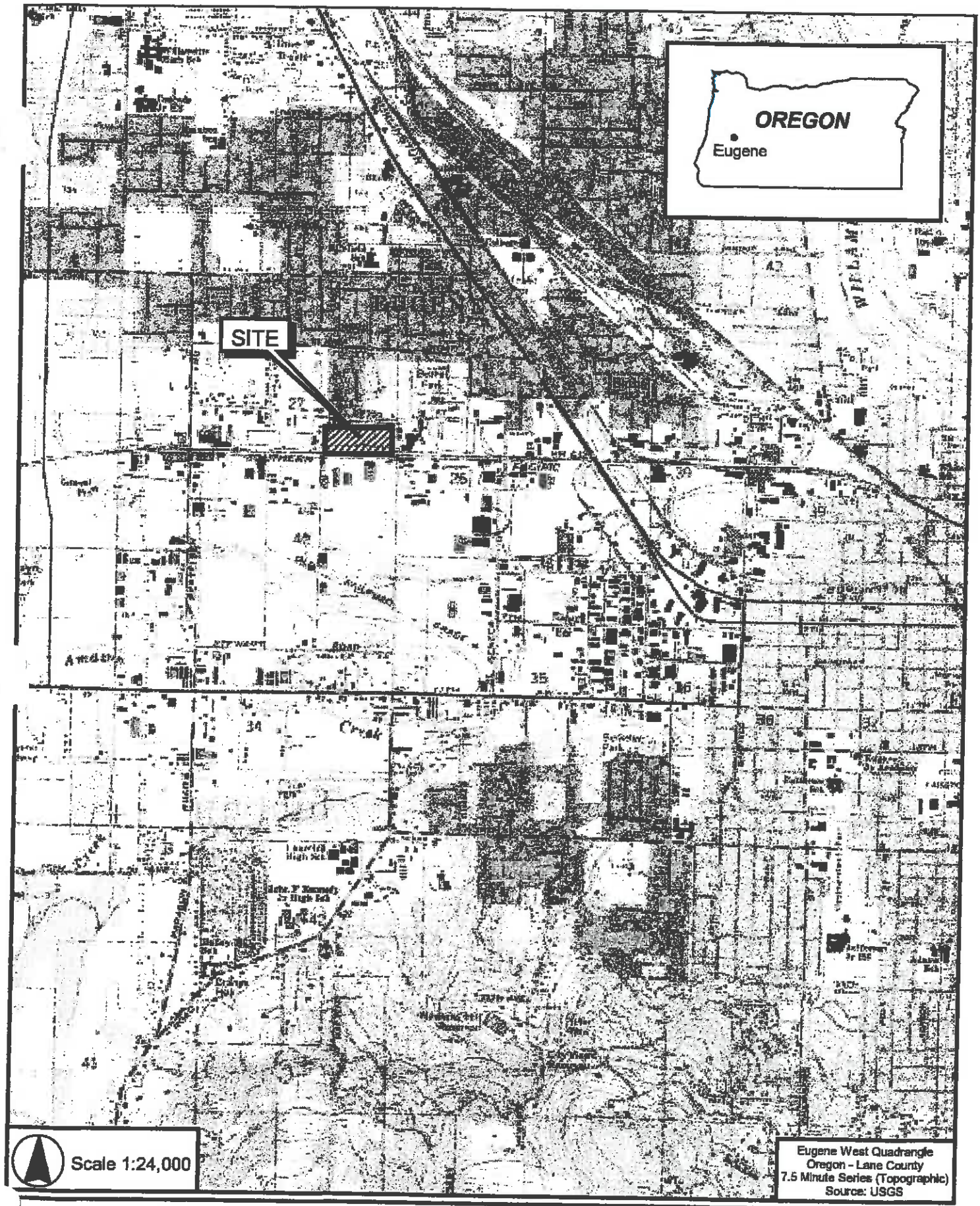


Figure 1. Vicinity Map - JH Baxter - Eugene, Oregon

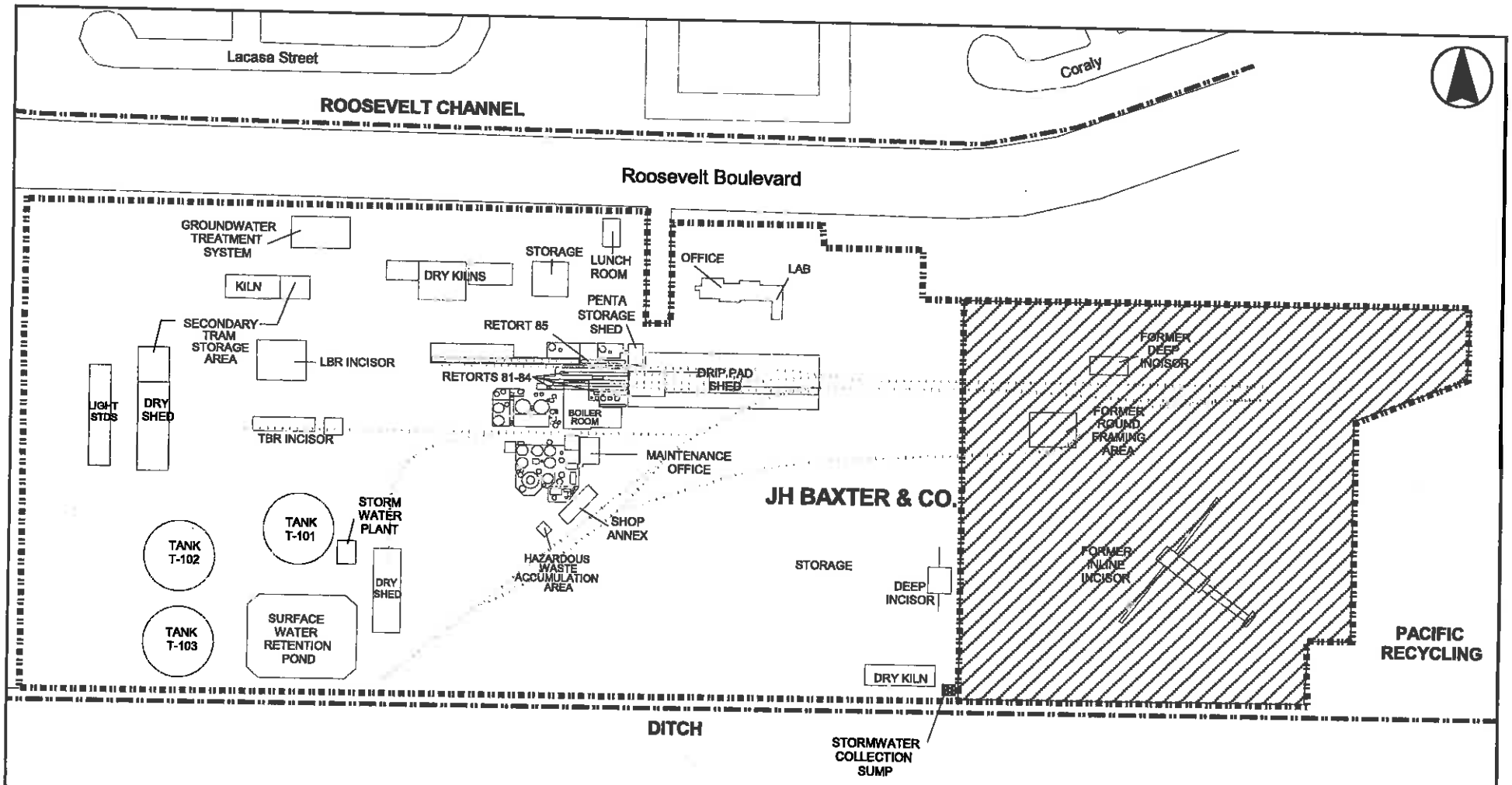


Figure 2. Facility Detail Map - JH Baxter - Eugene, Oregon

IV. HAZARDOUS MATERIALS EMERGENCY RESPONSE PROCEDURES

1.0 Objectives

The objectives of this procedure are to establish an operational emergency response plan in the event of a hazardous materials release or threatened release, and to prevent the release of a hazardous material that may cause harm to human health, safety, property or the environment.

2.0 Definitions and Reportable Quantities

Release: Any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, dumping or disposing into the environment, unless permitted or authorized by a regulatory agency.

Threatened Release: A condition creating substantial probability of harm, when the probability and potential extent of harm make it reasonably necessary to take immediate action to prevent, reduce, or mitigate damages to persons, property or the environment.

Reportable Quantities (RQs):

Hazardous Material	RQ Chemical	Chemical RQ	Concentration of RQ Chemical in Material (wt %)	Hazardous Material RQ
ACQ-C	Ammonium Hydroxide	1000 lb.	10	10,000 lb. 999 gal.
ACQ-Type B Solution	Copper	5000 lb.	5	100,000 lb. 11983 gal.
Ammonium Bicarbonate	Ammonium Bicarbonate	5000 lb.	100	5000 lb.
Aqua Ammonia (24%)	Ammonium Hydroxide	1000 lb.	100	1000 lb. 134 gal.
Arsenic Acid (Chemonite Part A)	Arsenic Acid	1.0 lb.	75	1.3 lb. 0.08 gal.
Chemonite (ACZA) Concentrate	Arsenic Pentoxide	1.0 lb.	3	33.3 lb. 3.8 gal.
Chemonite (ACZA) Work Solution	Arsenic Pentoxide	1.0 lb.	0.50	200 lb. 22.6 gal.
Creosote	Creosote	1.0 lb.	100	1.0 lb. 0.11 gal.
Creosote 50/50	Creosote	1.0 lb.	50	2 lb. 0.23 gal.
Copper Oxide (Chemonite Part B)	Copper	5000 lb.	87	5747 lb.
Pentachlorophenol Blocks	Pentachlorophenol	10 lb.	100	10 lb.
Pentachlorophenol A Solution	Pentachlorophenol	10 lb.	5.25	190.5 lb. 24.4 gal.
Pentachlorophenol C Solution	Pentachlorophenol	10 lb.	6.75	148.2 lb. 21.3 gal.
Sodium Hydroxide	Sodium Hydroxide	1000 lb.	50	2000 lb. 156 gal.
Zinc Oxide (Chemonite Part C)	Zinc	1000 lb.	97	1030 lb.

Hazardous Waste	RQ Chemical	Hazardous Waste RQ
Chemonite (ACZA) Process Waste [F035]	Arsenic	1.0 lb.
Chemonite (ACZA) Wood Debris [F035]	Arsenic	1.0 lb.
Pentachlorophenol & Creosote Process Waste [F032, F034]	Pentachlorophenol & Creosote	1.0 lb.
Pentachlorophenol & Creosote Wood Debris [F032, F034, F035]	Pentachlorophenol & Creosote	1.0 lb.
Used oil	Petroleum product	42 gal.

Reportable quantities (RQs) are referenced by 40 CFR 172.101

3.0 Responsibilities

3.1 The On-Site Emergency Action Team has been created to evaluate the severity of the release or threatened release, notify the appropriate corporate personnel and emergency response agencies and to provide the necessary information and assistance to the responding emergency agencies.

3.2 The On-Site Emergency Action Team shall consist of the Plant Manager, Treating Supervisor and Environmental and Safety Coordinator, and, if necessary, the Maintenance Lead Person and Boiler Room Engineer. The most senior manager on-site will be designated as the Emergency Coordinator.

3.3 All facility personnel are responsible for immediately reporting the release or potential release of a hazardous material to the supervisor.

4.0 Hazardous Materials Emergency Response Procedures

4.1 In the event of a hazardous material release or threatened release, regardless of the amount, the incident shall be reported immediately to the supervisor.

4.2 The material safety data sheet (MSDS) shall be reviewed for each hazardous material of concern before entering any area affected by a release or threatened release and the personnel protective equipment and the accidental release measures shall be strictly followed.

4.3 The On-Site Emergency Action Team shall be notified and assembled to safely confirm and evaluate the incident.

4.4 Depending on the severity of the release or the nature of the threatened release, the affected area shall be evacuated and all personnel should be accounted for.

4.5 Any employee injured by the exposure to the hazardous material released shall be transported to a medical facility. Emergency medical assistance or ambulance shall be contacted by dialing 911. Copies of the appropriate MSDS shall be given to the emergency medical assistance and shall accompany the exposed person to the hospital. OR-OSHA shall also be notified.

4.6 The Emergency Coordinator shall make the necessary notifications to the J.H. Baxter Corporate Office personnel.

4.7 A designated "back-up" person shall be available and present at all times outside the affected area, with radio contact, while the members of the On-Site Emergency Action Team are working inside of the affected area.

4.8 If safely possible and conditions allow, the source of the release shall be secured.

4.9 Temporary berms and dams shall be constructed around a release, not within secondary containment, to prevent the release from spreading, and berms shall be constructed around storm water catch basins and sumps to prevent hazardous materials from entering the treatment system.

4.10 For small releases, the On-Site Emergency Action Team shall proceed with the appropriate clean-up measures as identified in the MSDS. All contaminated soils, liquids, PPE and absorbent materials shall be removed for remediation or disposal in accordance with federal, state and local regulations. All contaminated equipment shall be properly decontaminated.

4.11 For large releases, the facility shall employ a clean-up contractor to perform all clean-up activities.

4.12 The Emergency Coordinator shall confirm the clean-up project is complete by inspecting the affected area, surrounding areas and equipment used in the clean-up process.

5.0 Emergency Action Team

1.0 An onsite Emergency Action Team has been created to evaluate the severity of an emergency, notify the appropriate corporate personnel/emergency response agencies and to provide necessary information and assistance to the responding emergency agencies.

2.0 The Emergency Action Team shall consist of the Production Manager, Environmental Manager and if necessary the Maintenance Lead and Boiler Room Engineer. The Environmental Manager will be designated as the Emergency Coordinator.

Emergency Coordinator (or most senior manager available):

Scott Thielke – Environmental Manager	(541)285-0697

Onsite Emergency Action Team:

Jeanne Olson	Plant Manager	(541)225-7984
Scott Thielke	Environmental Manager	(541)285-0697
David Duchi	Treating Supervisor	(530)859-1828

VI. NOTIFICATION AND REPORTING

1.0 In the event of a hazardous material release or threatened release, regardless of the amount, the incident shall be reported immediately to the supervisor.

2.0 The On-Site Emergency Action Team shall be notified and assembled to safely confirm and evaluate the incident.

Facility Office daytime number:	(541) 689-3801
Jeanne Olson – Plant Manager	(541) 225-7984
Scott Thielke – Environmental Manager	(541) 285-0697

3.0 The Emergency Coordinator shall notify the following J.H. Baxter corporate office personnel (call in this order until someone is reached):

San Mateo Office daytime number:		(650) 349 - 0201
Rue Ann Thomas	Owner-Representative	(541) 968 - 9768
Georgia Baxter	President	(650) 938 - 8814

4.0 The Emergency Coordinator, in conjunction with the other members of the On-Site Emergency Action Team, shall determine the approximate amount in pounds or gallon of the release and make the appropriate notifications.

5.0 If the release or threatened release **equals or exceeds** the reportable quantity (RQ) for each hazardous material of concern, the following emergency agencies must be notified immediately:

5.1	National Response Center	(800) 424 - 8802
5.2	Oregon Emergency Response System	(800) 452 - 0311
5.3	Fire Department	911

6.0 If the release or threatened release is **less** than the reportable quantity (RQ) for each hazardous material of concern, the following emergency agencies must be notified immediately:

6.1	Office of Emergency Services	(800) 852 - 7550
6.2	Fire Department	911

7.0 As necessary, the following agencies may be called:

7.1	Police	911
7.2	Medical Assistance/Ambulance	911

8.0 Oregon OSHA (OR-OSHA) shall be notified in the event that an employee is injured from over-exposure to the hazardous material released.

8.1	Eugene District Office	(541) 686 - 7562
8.2	Central Office, Salem	(800) 922 - 2689

9.0 Immediate notification shall be provided as soon as:

9.1 The facility has knowledge of the release or threatened release
9.2 Notification can be provided without impeding immediate control of the release or threatened release
9.3 Notification can be provided without impeding immediate emergency medical measures

Note: Immediate notification to the response agencies shall not be required if there is reasonable belief that the release or threatened release poses no significant present or potential hazard to human health and safety, property, or the environment.

10.0 All notification reports to the emergency agencies shall include, at a minimum, the following information:

10.1 Name and title of J.H. Baxter personnel making the notification
10.2 Facility name, address and phone number
10.3 The name of the hazardous material released
10.4 The estimated quantity of the hazardous material released
10.5 The time and date the hazardous material was released

11.0 All verbal reports and phone calls to emergency agencies shall be documented, including the following information:

11.1 Name and title of J.H. Baxter personnel making the notification
11.2 Name of contact person, title, response agency and phone number
11.3 Time and Date of the notification
11.4 Summary of the conversation

12.0 Within 15 days after the release event, a written report shall be submitted to EPA, state and local hazardous waste agencies with the following information:

12.1 Facility name, address and phone number
12.2 Owner name, address and phone number
12.3 The time and date the hazardous material was released
12.4 The name and quantity of the hazardous material released
12.5 Extent of injuries
12.6 Assessment of actual or potential hazards to human health or the environment, where applicable
12.7 Estimated quantity and disposition of recovered material that resulted from the incident.

VII. EVACUATION PLAN

1.0 This evacuation plan shall be used in case of a fire, potential life threatening hazardous material release, or any other emergency situation that has the potential to harm human life and safety.

2.0 The emergency alarm, consisting of a continuous whistle blast, shall be sounded, at the discretion of the Management Team, using the yard horn located in the main office.

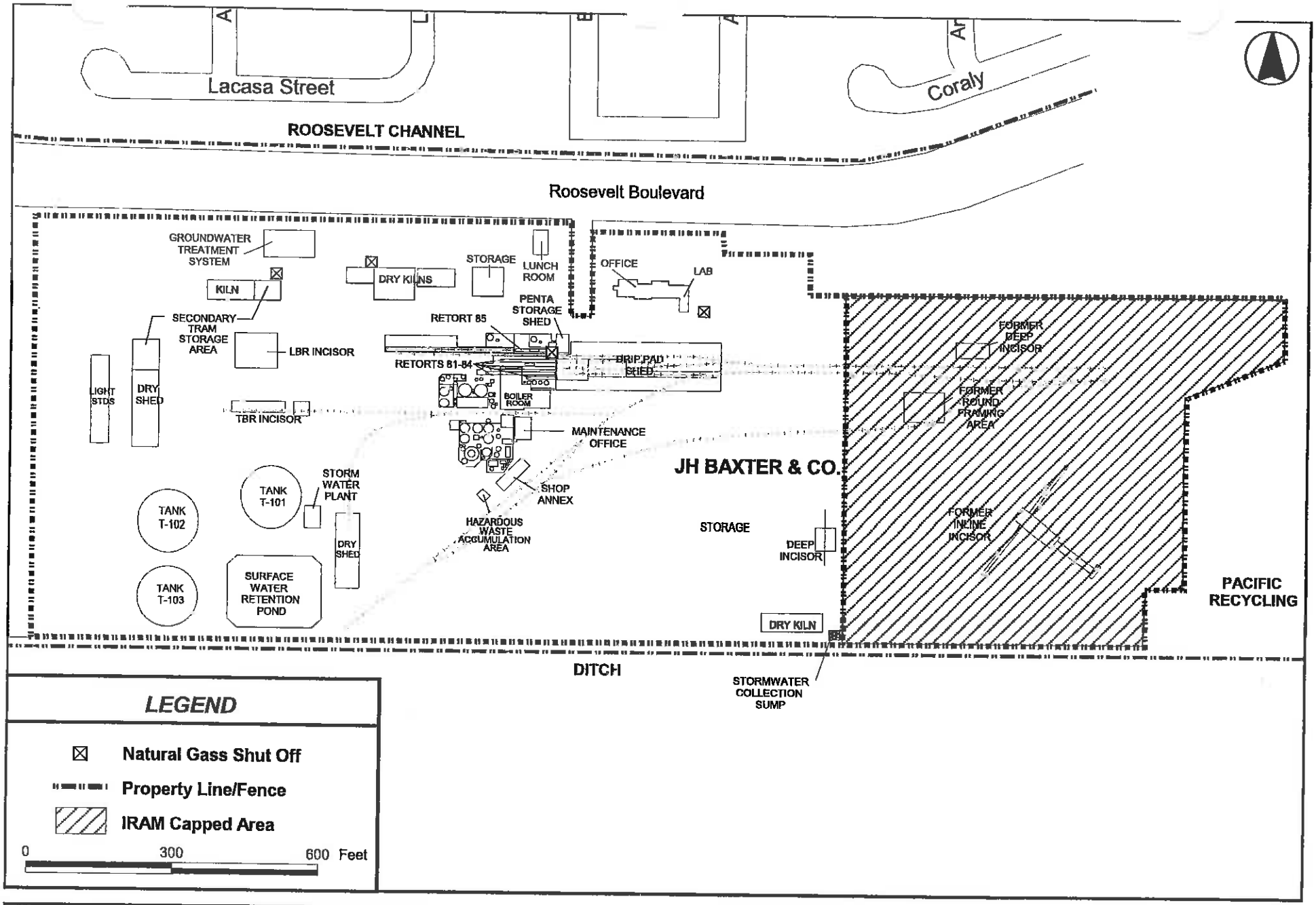
3.0 All facility personnel shall immediately report to the primary assembly area, in the Baxter truck parking area, located behind the laboratory. If necessary, employees may be directed to the alternate assembly area located in the main parking area parallel to Roosevelt Avenue.

4.0 A head count or roll call shall be taken and the results shall be reported to the Plant Manager.

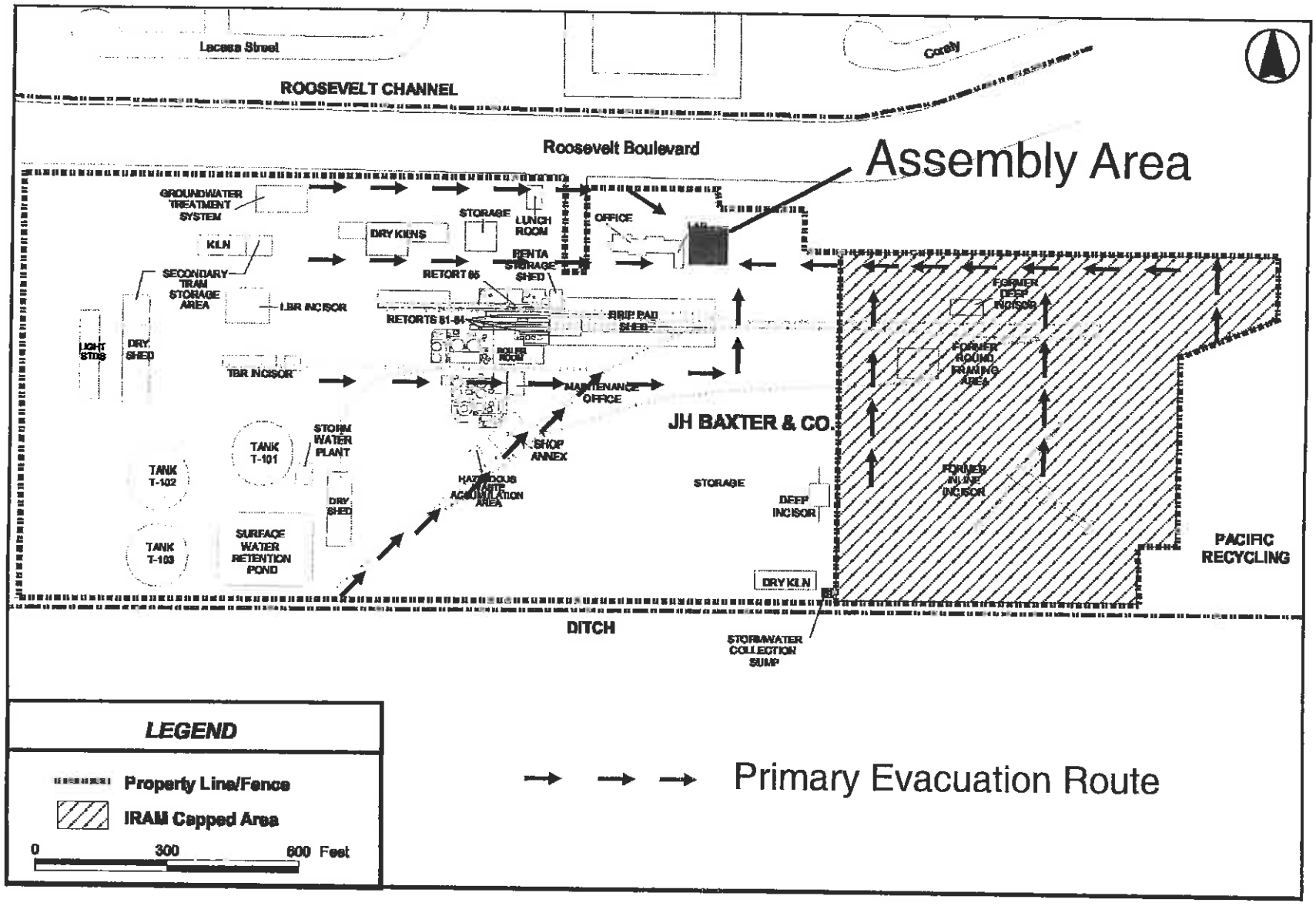
5.0 The On-Site Emergency Action Team shall be notified and assembled to safely confirm and evaluate the incident.

6.0 In case of a complete evacuation, all movement out of the plant shall be coordinated through the Emergency Coordinator. In no case shall employees walk through any potentially dangerous area.

7.0 The facility shall conduct an evacuation drill quarterly.

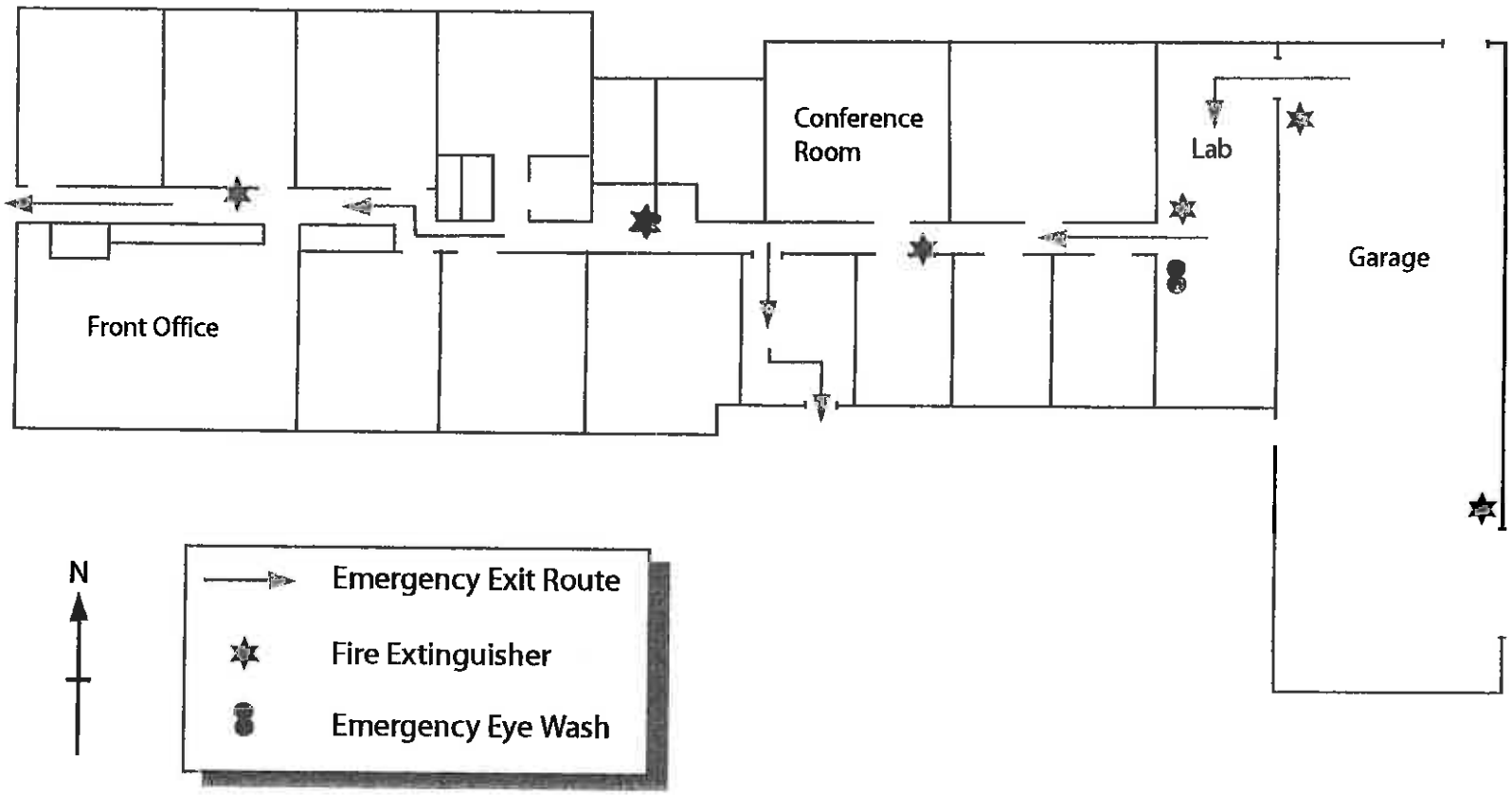


Natural Gas Shut Off Locations - JH Baxter - Eugene, Oregon

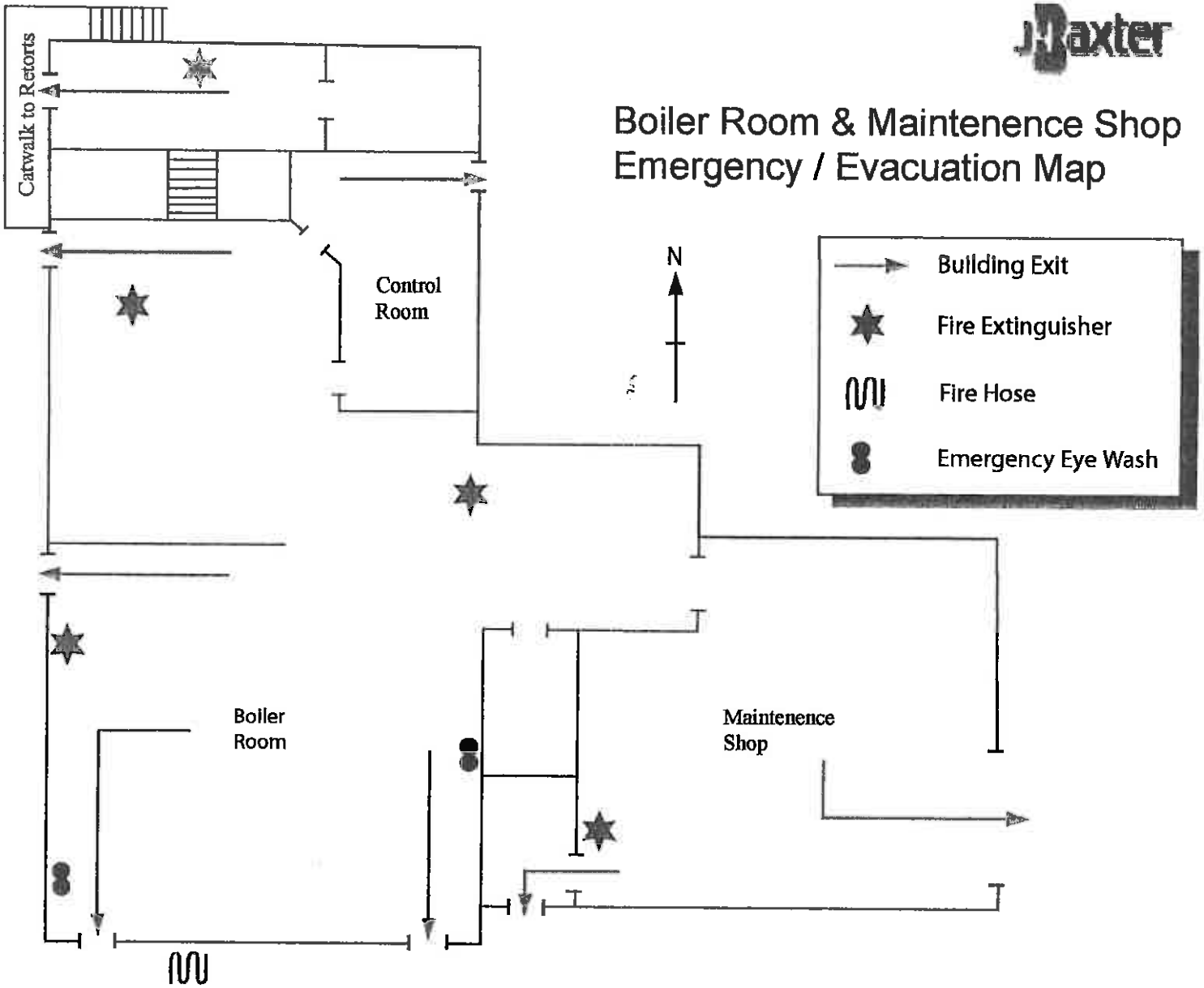


J.H. Baxter & Company – Evacuation Route

Main Office Emergency / Evacuation Map



Boiler Room & Maintenence Shop
Emergency / Evacuation Map



VIII. EMERGENCY EQUIPMENT LIST

Communication Resources:	
Telephones	Boiler Room Main Office Maintenance Office
Radios	Main Office Yard Supervisors
Chemical Spill Equipment:	
Emergency Showers	Main Lunch Room (hot water) New Dry Shed Stormwater Treatment Plant Tank #34 Containment Area
Eye Wash Stations	Boiler Room Boiler Room Drum Cradle J-Press Laboratory Lubricating Oil Storage Area New Dry Shed Retort #85 Stormwater Treatment Plant Tank #34 Containment Area
Eye Wash Bottles	Men's Room in Main Office Pole Yard Tool Shed
Absorbent Material	Boiler Room Hazardous Waste Storage Shed
Shovels	Hazardous Waste Storage Shed Maintenance Shop
Portable Pumps	Boiler Room Maintenance Shop
Metal/Plastic Drums	Groundwater Treatment Plant Hazardous Waste Storage Shed

Personnel Protective Equipment:	
NBR Coated Gloves	Boiler Room Maintenance Office Treating Supervisor's Office
PVC and Cotton Gloves	Maintenance Office Treating Supervisor's Office
Leather Gloves	Maintenance Office
Rubber Boots	Maintenance Office Treating Supervisor's Office
Hard Hats	Main Office
Safety Goggles	Boiler Room Maintenance Office Treating Supervisor's Office
Face Shields	Boiler Room Maintenance Office Treating Supervisor's Office
Rain Suits	Treating Supervisor's Office
Tyvek Suits	Boiler Room Maintenance Office Treating Supervisor's Office
Dust Masks	Treating Supervisor's Office
Respirators	Boiler Room Maintenance Office Treating Supervisor's Office
Ear Plugs	Treating Supervisor's Office
First Aid Kits:	Main Office Boiler Room Light Standards Break Room Lumber Machine Break Room Maintenance Shop Pole Framing Area Shaver Control Room

Fire Protection:

Fire Hydrants, Fire Hoses, Fire Extinguishers

IX. HAZARDOUS WASTE MANAGEMENT PROCEDURES

1.0 Objective

The objective of this procedure is to establish the minimum management practices for the proper identification, handling, storing and shipping of hazardous waste generated at the wood preserving facility, in accordance with the Resource Conservation and Recovery Act (RCRA).

2.0 Definitions and Hazardous Waste Classifications

Hazardous Waste: A solid waste (any disposed or recycled material including, liquids and sludges) which, because of it's quantity, concentration, or physical or chemical characteristics, may cause or contribute, to significant injury or death, or damage or pollute the land, air or water. Hazardous wastes are classified as either a listed or characteristic waste.

Listed Waste: A listed waste is a hazardous waste because the waste or process in which it was generated generally meets one or more hazardous waste characteristic. Listed wastes are categorized into the following waste code groups or sources:

- D hazardous wastes that exhibit toxicity characteristics
- F hazardous wastes from non-specific sources
- K hazardous wastes from specific sources
- P hazardous wastes chemical products, manufacturing intermediates or off-specification products that may cause acute effects
- U hazardous wastes chemical products, manufacturing intermediates or off-specification products

Hazardous Waste Characteristics:
The four characteristics that determine whether a waste is a hazardous waste are: corrosivity, ignitability, reactivity and toxicity.

Corrosivity: Has a pH less than or equal to 2 or greater than or equal to 12.5.

Ignitability: Contains less than 24% alcohol and has a flash point of less than 140°F.

Reactivity: Normally unstable product that has the potential to undergo violent change without detonating and reacts with water.

Toxicity: Equals or exceeds the TCLP concentration level given in Table 1 of 40 CFR 261.24.

3.0 Hazardous Waste Generated at Wood Preserving Facilities

The wood preserving process at the Eugene Facility typically generates the following waste streams:

Waste Description	Waste Code	Characteristic
Pentachlorophenol/Creosote process waste	F032, F034	Toxicity
Pentachlorophenol/Creosote treated wood & debris	F032,F034,F035	Toxicity
Chemonite process waste	F035	Toxicity
Waste water treatment sludge	K001	Toxicity

4.0 EPA Identification Number

A facility/generator must obtain an EPA Identification Number once it has been determined that a hazardous waste has been generated. This EPA Identification Number permits or allows the generator to treat, store, dispose, transport or offer hazardous waste for transport.

The Eugene EPA Identification Number is: ORD009032400

5.0 Hazardous Waste Accumulation and Storage Times

In general, hazardous waste may only be stored on site for 90 days, after that it must be transported to a permitted hazardous waste disposal facility. An exception to the 90-day rule is the satellite accumulation area.

A satellite accumulation area is a storage area near or at the point of waste generation that is a different location than the main hazardous waste storage area. Waste may accumulate in the satellite area for no longer than one (1) year, however, it must also be transported from the facility within the same year. Once a satellite drum becomes full, it shall be moved to the main storage area within 3 days.

Hazardous waste inventories, including drum numbers, waste description, source description, accumulation start date and/or satellite start date, fill date and shipping information shall be maintained at the facility. Inventories shall be reported to the corporate office on the first and fifteenth of every month.

6.0 Hazardous Waste Labels

Each drum containing hazardous waste shall be clearly marked with a label containing the following items:

The words "Hazardous Waste"
The generator's name, address, phone number and EPA ID Number
The accumulation start date
The EPA and/or State Waste No.
The DOT proper shipping name and UN or NA number

Sample hazardous waste labels for Eugene are included as Attachments 1 through 4.

7.0 Hazardous Waste Inspections

Hazardous waste drums and accumulation areas shall be inspected by the facility on a weekly basis. These records shall be maintained at the facility for a minimum of five (5) years. A sample inspection form is included as Attachment 5.

8.0 Hazardous Waste Shipping, Manifests and Land Disposal Restriction Forms

A completed Uniform Hazardous Waste Manifest and associated Land Disposal Restriction Form, if applicable, shall accompany every shipment of hazardous waste. Manifests and Land Disposal Restriction Forms shall be maintained on site for a minimum of five (5) years. Sample completed manifest forms for the Eugene facility are included as Attachment 6 through 9.

9.0 Record keeping and Reports

The Hazardous Waste Report, consisting of information contained in the Biennial Report, EPA Form 8700-13A, shall be submitted to DEQ by March 15. This report shall be maintained at the facility for a minimum of five years.

In addition to hazardous waste inventories, weekly inspection reports, manifests, land disposal restriction forms, and biennial reports, the facility is required to maintain records of waste analyses, test results and other associated information used in determining waste classification for a minimum of five years after the date the waste was last sent for disposal.

X. EMPLOYEE TRAINING PROGRAM

All J.H. Baxter employees shall receive Hazardous Communication (HazCom) training to educate the employees on the content and procedures of the Business.

Initial training shall occur within six (6) months of employment or of a new hazardous material on-site and each employee shall attend an annual refresher training class. This program will include training in the following areas:

- Hazardous material inventory
- Material Safety Data Sheets (MSDS)
- Proper Hazardous Materials Handling
- Emergency Response Procedures
- Spill Prevention Control and Countermeasure (SPCC) Plan
- Notification Procedures
- Evacuation Procedures and Drill Exercise
- Proper Use of Emergency and Safety Equipment
- Respiratory Protection Program
- Hearing Conservation Program
- Confined Space Entry Program
- Lock-out/Tag-out Program

Training records shall be maintained in the facility's Training Register and Personnel Files.

XI. QUICK REFERENCE GUIDE

Emergency Response Procedures

1. Immediately report a hazardous material release or threatened release to the supervisor.

2. Notify and assembly on-site emergency action team:

   Facility Office daytime number: (541) 689 - 3801

Jeanne Olson	Plant Manager	(541) 225-7984
Scott Thielke	Environmental Manager	(541) 285-0697

3. Verify severity of release and evacuate area as necessary.

4. If safely possible, secure the source of the release and create berms to prevent the release from spreading to other areas.

5. Notify J.H. Baxter Corporate Office personnel:

   San Mateo Office daytime number: (650) 349 - 0201

RueAnn Thomas	Owner-Representative	(541) 968 - 9768
Georgia Baxter	President	(650) 938 - 8814

6. Notify the appropriate emergency response agencies:

   If the release or threatened release **equals or exceeds** the reportable quantity (RQ) for each hazardous material of concern:

National Response Center	(800) 424 - 8802
Oregon Emergency Response System	(800) 452 - 0311
Fire Department	911

   If the release or threatened release is **less** than the reportable quantity (RQ) for each hazardous material of concern:

Oregon Emergency Response System	(800) 452 - 0311
Fire Department	911

   As necessary, the following agencies may be called:

Police	911
Medical Assistance/Ambulance	911

   Oregon OSHA (OR-OSHA) shall be notified in the event that an employee is injured from over-exposure to the hazardous material released.

Eugene District Office	(541) 686 - 7562
Headquarters, Salem	(800) 922 - 2689

Reportable Quantities:

ACQ-C	Ammonium Hydroxide	1000 lb.	10	10,000 lb. 999 gal.
ACQ-Type B Solution	Copper	5000 lb.	5	100,000 lb. 11983 gal.
Ammonium Bicarbonate	Ammonium Bicarbonate	5000 lb.	100	5000 lb.
Aqua Ammonia (24%)	Ammonium Hydroxide	1000 lb.	100	1000 lb. 134 gal.
Arsenic Acid (Chemonite Part A)	Arsenic Acid	1.0 lb.	75	1.3 lb. 0.08 gal.
Chemonite (ACZA) Concentrate	Arsenic Pentoxide	1.0 lb.	3	33.3 lb. 3.8 gal.
Chemonite (ACZA) Work Solution	Arsenic Pentoxide	1.0 lb.	0.50	200 lb. 22.6 gal.
Creosote	Creosote	1.0 lb.	100	1.0 lb. 0.11 gal.
Creosote 50/50	Creosote	1.0 lb.	50	2 lb. 0.23 gal.
Copper Oxide (Chemonite Part B)	Copper	5000 lb.	87	5747 lb.
Pentachlorophenol Blocks	Pentachlorophenol	10 lb.	100	10 lb.
Pentachlorophenol A Solution	Pentachlorophenol	10 lb.	5.25	190.5 lb. 24.4 gal.
Sodium Hydroxide	Sodium Hydroxide	1000 lb.	50	2000 lb. 156 gal.
Zinc Oxide (Chemonite Part C)	Zinc	1000 lb.	97	1030 lb.

Hazardous Waste	RQ Chemical	Hazardous Waste RQ
Chemonite (ACZA) Process Waste [F035]	Arsenic	1.0 lb.
Chemonite (ACZA) Wood Debris [F035]	Arsenic	1.0 lb.
Pentachlorophenol & Creosote Process Waste [F032, F034]	Pentachlorophenol & Creosote	1.0 lb.
Pentachlorophenol & Creosote Wood Debris [F032, F034, F035]	Pentachlorophenol & Creosote	1.0 lb.
Used oil	Petroleum product	42 gal.

Reportable quantities (RQs) are referenced by 40 CFR 172.101

ATTACHMENT 5

Hazardous Waste Inspection Form Sample

Rev. 09/10/2010

Privileged and Confidential

J.H. Baxter & Co.
Weekly Facility Inspection Report
(Submit to Environmental Programs Director every Friday before 12:00 pm)

Plant: _____ Inspected by (signature) _____

Date: _____ Time of Inspection: _____

HAZARDOUS WASTE AND MATERIAL STORAGE AREAS

Satellite Accumulation Areas

Inspected (Yes/No/N/A)	Regulation Summary
	Location of satellite accumulation areas inspected?
	Waste accumulated is at or near the point of generation and under the control of the operator.
	No more than 55 gallon total of hazardous waste at any one time in each satellite accumulation area for each waste stream.
	Filled and closed drum moved to hazardous waste storage area within 72 hours of closure.
	Labels are located in the top 1/3 of the each drum.
	Containers are marked with the words "hazardous waste".
	Containers are marked with generator's name and address.
	Containers are marked with the physical state and hazardous properties of the waste.
	Labels are in good condition, legible and visually accessible.
	Each container is properly closed with the lid secured and is opened only to add material to the container.
	Containers are in good condition and there are no signs of leaking.
	Waste is compatible with container in which it is stored in.

90-Day Storage Areas

Inspected (Yes/No/N/A)	Regulation Summary
	All containers are marked with the words "hazardous waste".
	All containers are marked with generator's name and address.
	All containers are marked with accumulation start date and fill date.
	All containers are marked with the physical state and hazardous properties of the waste.
	Labels are located in the top 1/3 of each drum.
	Labels are in good condition, legible and visually accessible.

	All containers are in good condition and there are no signs of leaking.
	All containers are closed except when adding or removing waste.
	Containers are marked with accumulation start date.
	Waste is compatible with container that it is stored in.
	Treated wood debris bins contain only treated wood debris, are properly closed and secured except when adding or removing waste and show date of accumulation.
	There is adequate aisle space in the storage area (30 inches between drums and no more than 2 drums wide).
	Area is free of debris.
	Secondary containment is in good condition.
	Secondary containment is free of debris and liquids.
	Storage areas are marked with the NFPA HazMat identification diamond.
	Hazardous waste drums are shipped to a TSD facility within the 90-day criteria.
	Any drums within 20 days of 90 day criteria have been noted and notification has been provided to the Environmental Programs Director.

Drip Pads and Treating Areas

Inspected (Yes/No/N/A)	Regulation Summary
	Drip pads are free of cracks, gaps, corrosion or other deterioration.
	Drip pads are free of residues and wood debris.
	Process and storage tanks are marked with an legible identification label.
	Storage tanks and process areas are marked with legible NFPA HazMat identification diamond.
	Sumps are free of standing liquids and debris.
	There are no signs of spills or incidental drippage in areas other than the drip pad and treating areas are free of spills.
	All Chemonite treated material is under cover during rainy season.
	For facilities with aprons, aprons are free of cracks or other deterioration and there are no signs of incidental drippage.

Storage Yards

Inspected (Yes/No/N/A)	Regulation Summary
	There are no signs of spills or incidental drippage in the storage yard.
	All Chemonite treated material is under cover during rainy season.
	All product including skid stack are properly stacked.
	Area is free of debris.

Hazardous Materials

Inspected (Yes/No/N/A)	Regulation Summary
	Hazardous material containers are marked with the manufacturer's label.
	Hazardous material storage areas are marked with the NFPA HazMat identification diamond.
	All containers are in good condition and there are no signs of leaking.
	Hazardous material containment areas are free of debris.
	All secondary containers are clearly labeled.
	Used oil containers and tanks are labeled properly.
	All oily rags have been properly disposed of.
	No spent aerosol cans are uncontrolled outside of satellite/accumulation containers.
	Hazardous material storage areas are free of spills.
	Parts washer equipment lid remains closed except when in operation.
	Gasoline and other flammable material storage areas are clearly marked with a "No Smoking with 25 feet" and "Flammable Material" sign.

Laboratory Areas

Inspected (Yes/No/N/A)	Regulation Summary
	There are no signs of spills.
	Waste accumulated is at or near the point of generation and under the control of the operator.
	No more than one 55 gallon drum of hazardous waste with lockable lid at any one time in satellite accumulation area. .
	Filled and closed drum moved to hazardous waste storage area within 72 hours of closure.
	Labels are located in the top 1/3 of the each drum.
	Containers are marked with the words "hazardous waste".
	Containers are marked with generator's name and address.
	Containers are marked with the physical state and hazardous properties of the waste.
	Labels are in good condition, legible and visually accessible.
	Each container is properly closed with the lid secured and is opened only to add material to the container.
	Containers are in good condition and there are no signs of leaking.
	Waste is compatible with container in which it is stored in.

RECORD KEEPING

Inspected (Yes/No/N/A)	Regulation Summary
	The drip pad cleaning log documents the date and time of each cleaning and the cleaning procedure used.
	The drip pad inspection form is being completed on a weekly basis and after storms.
	The drip pad records adequately document the length of time each charged is held on the pad until drippage has ceased.
	Incidental drippage inspections are being completed every 24 hours and inspection forms have been completed and signed.

CORRECTIVE ACTIONS

Corrective Actions or Comments:	Scheduled Completed Date:	Assigned to: