

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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In the Matter of Remedial Action by:)
PRI Northwest, Inc.)
Site Location: 709 Alexander Avenue)
Tacoma, Washington)

DEPARTMENT OF ECOLOGY
AGREED ORDER
No. DE 93TC-301

TO: PRI Northwest, Inc.)
733 Bishop Street)
P.O. Box 3379)
Honolulu, Hawaii 96842)

I.

Jurisdiction

This Agreed Order ("Order") is issued pursuant to the authority of RCW 70.105D.050(1).

II.

Findings of Fact

Ecology makes the following Findings of Fact, without admission of such facts by PRI Northwest, Inc. (PRI).

1. The site under consideration is a currently unused industrial site located on the northwestern shores of the Mouth of Hylebos Waterway in Commencement Bay, Tacoma, Washington. The site is bordered by Alexander Avenue to the southwest, Occidental Chemical plant to the northwest, the Hylebos Waterway to the northeast, and Port of Tacoma property to the southeast. Figure 1 in Appendix A shows the site and its location with respect to Hylebos Waterway. The site area is approximately 4.4 acres.

2. The PRI property, formerly operated by Fletcher Oil, had been the location of a bulk petroleum fuel storage and distribution terminal from the 1930s to the 1980s. Additionally, Fletcher Oil, and subsequently PRI, operated a tetraethyl lead plant, blending lead with gasoline during the late

1970s and the early 1980s. United Independent Oil operated a topping plant for crude oil distillation on the property in the 1970s and 1980s. At the present time, the site is enclosed by a chain-link fence, and there are five empty above-ground storage tanks.

3. From 1979 to 1983 the following spills at the site were documented in Ecology's files:

- a. 1979 - Gasoline spill, 69 gallons.
- b. 1981 - Safety-Kleen (aliphatic solvent) spill, quantity unspecified.
- c. 1981 - Product spills from leaky valves noted, quantity unspecified.
- d. 1983 - Diesel fuel spill, 300 gallons, seeped into ground, did not enter Hylebos Waterway over land.

4. In 1989 Ecology and Environment, Inc., under contract to EPA, performed a file review and inspection of the site. As a part of this inspection, 12 groundwater samples and 4 soil samples (3 subsurface and 1 surface soil samples) were collected to evaluate the site. Groundwater samples were collected at 7 to 12 feet below ground surface (bgs). A water sample was taken for analysis from the standing water in the underground storage tank (UST) excavations area. The UST area in which a water sample was taken is identified as Pit on Figure 2 of Appendix A.

The groundwater samples were analyzed for volatile organic compounds (VOCs), lead, and oil & grease. Selected groundwater samples were analyzed for total metals, semi-volatile compounds, Polychlorinated Biphenyl (PCBs), and pesticides. Three soil samples were collected and analyzed for lead only from three areas near the former gasoline leading facility, and one soil sample was collected and analyzed for PCBs from an oil-stained soil area.

The soil, groundwater, and pit water sample location map is shown in Figure 2 of Appendix A. Table A summarizes the results from the groundwater/pit water, and soil sampling performed by Ecology and Environment:

TABLE A

POLLUTANT	GROUNDWATER, ug/l	SOILS, mg/kg
Total Arsenic	2.8-90.8	--
Total Chromium	8.8-160	--
Total Copper*	7.8-355	--
Total Lead*	43.6-654	14
Total Mercury*	.20-2.33	--
Total Nickel	10-242	--
Total Zinc*	50-2,270	--
Vinyl Chloride	10-270	--
1,2-Dichloroethene	1-90	--
Trichloroethene*	5-160	--
Tetrachloroethene*	5-1100	--
Toluene	1-350	--
Ethyl Benzene	2-120	--
Benzene	2-2500	--
PCBs (1260)*	--	10.90
PCBs (1254)*	--	13.4

* These constituents have been identified as problem chemicals in the sediment in the Mouth of the Hylebos Waterway, as stated in Source Control Strategy -- Commencement Bay Nearshore/Tideflats, Superfund Site, May 1992. The groundwater results represent ranges of concentration of constituents measured in groundwater and standing water in the underground storage tank (UST) excavations area. The highest concentrations for Total Arsenic through Total Zinc were detected in water samples collected from the UST excavations area. None of the water samples were filtered for total metals analysis.

5. On April 8, 1992, Ecology's inspectors collected random samples of groundwater seeps and fill material/soil on the bank of Hylebos Waterway along the site. The samples were tested for priority pollutant metals and volatile organic compounds. The results are shown in Table B:

TABLE B		
POLLUTANT	BANK FILL/SOIL, ug/kg	GROUNDWATER SEEP, ug/l
Total Lead*	37,400,000	5,290**
Carbon Tetrachloride	5	--
Chloroform	20	--
Hexachlorobutadiene*	11	--
Trimethylbenzene	20	--
Tetrachloroethene*	9	42
Xylene	11	--
Total Zinc*	--	9.7**
Total Copper*	--	228**
1,2 Dichloroethene	--	33
Trichloroethene*	--	35

* These constituents have been identified as problem chemicals in the sediment in the Mouth of the Hylebos Waterway, as stated in Source Control Strategy -- Commencement Bay Nearshore/Tideflats, Superfund Site, May 1992.

** Total Recoverable

During this inspection, Ecology's inspectors also discovered the presence of graphite anodes on the bank of the Hylebos Waterway along the site and rusted abandoned drums in the water (the drums were on the bank during the low tide condition, they may be under water during the high tide condition). A sample was taken from the content of one of the abandoned drums and analyzed to determine its hydrocarbon ID and PCBs concentration. Based on the test results, the sample was identified to be asphalt and PCBs were absent.

6. The Mouth and Head of the Hylebos Waterway are identified as a problem area with contaminated sediment in the Record of Decision (ROD) issued

by EPA, Region 10, for Commencement Bay Nearshore/Tideflats in September 1989. This Agreed Order is being issued to complete a remedial investigation at the site and to support the source control program being implemented in Commencement Bay to eliminate or reduce the hazardous substance release into the marine environment.

III.

Ecology Determinations

1. PRI Northwest Inc., is an owner as defined at RCW 70.105D.020(6) of a "facility" as defined in RCW 70.105D.020(3).
2. The facility is known as PRI Northwest, Inc., and is located at 709 Alexander Avenue, Tacoma, Washington.
3. The substances found at the facility as described above are "hazardous substances" as defined at RCW 70.105D.020(5).
4. Based on the presence of these hazardous substances at the facility and all factors known to Ecology, there is a release or threatened release of hazardous substances from the facility, as defined at RCW 70.105D.020(10).
5. On February 5, 1993, and March 10, 1993, Ecology notified PRI Northwest, Inc., and F.O. Fletcher, Inc., respectively, informing them of their status as "potentially liable person" under RCW 70.105D.040 after notice and opportunity for comment.
6. Pursuant to RCW 70.105D.030(1) and 70.105D.050, Ecology may require potentially liable persons to investigate or conduct other remedial actions with respect to the release or threatened release of hazardous substances, whenever it believes such action to be in the public interest.
7. Based on the foregoing facts, Ecology believes the remedial action required by this Order is in the public interest.

IV.

Work To Be Performed

Based on the foregoing facts and determination, it is hereby ordered that PRI Northwest, Inc., take the following remedial actions and that these actions be conducted in accordance with Chapter 173-340 WAC unless otherwise

specifically provided for herein.

1. Perform the Site Investigation in accordance with the "preliminary site investigation work plan and its revisions"¹ which were reviewed and approved by Ecology. The Table of Contents of the preliminary site investigation work plan is in Appendix A of this Agreed Order.

2. The type and extent of non-sediment material (e.g. sludges, lead sludges, abandoned drums, and graphite anodes) in each test pit, upland area, and nearshore bank area along the site shall be documented in the remedial investigation report. The location (s) of the non-sediment materials found shall be identified in a diagram of the site. Also, the potential sources of these non-soil man-made materials (e.g., graphite anodes, abandoned drums) shall be addressed in the remedial investigation report.

3. The site investigation shall be conducted in accordance with the schedule contained on Page 9 of the approved preliminary site investigation work plan. Any unanticipated changes for implementing the investigative work shall be reported to Ecology.

4. During the soil sampling and well drilling/construction activities, the consultant or contractors shall implement precautions to ensure that on-site work will not cause the release of contaminants to the marine environment.

5. The draft remedial investigation report shall be submitted to Ecology upon its completion in accordance with the schedule contained in Page 9 of the preliminary site investigation work plan.

6. The final remedial investigation report, addressing Ecology's comments on the draft version, shall be submitted to Ecology within 30 days of receipt of Ecology's comments.

7. If unanticipated results are obtained after conducting this investigative work, additional site investigation may be required to complete

¹ PRI Northwest, Inc., submitted a work plan to Ecology on July 12, 1993. Ecology reviewed and commented on the work plan. PRI Northwest, Inc, revised the work plan on a correspondence dated September 1, 1993. The Site Investigation shall be performed in accordance with the approved work plan and its revisions.

a site investigation. In this case, this Order would be amended or a new order would be issued.

V.

Terms and Conditions of Order

1. Definitions

Unless otherwise specified, the definitions set forth in Ch. 70.105D RCW and Ch. 173-340 WAC shall control the meanings of the terms used in this Order.

2. Public Notices.

RCW 70.105D.030(2)(a) requires that, at a minimum, this Order be subject to concurrent public notice. Ecology shall be responsible for providing such public notice and reserves the right to modify or withdraw any provisions of this Order should public comment disclose facts or considerations which indicate to Ecology that the Order is inadequate or improper in any respect.

3. Remedial Action Costs.

PRI Northwest, Inc., shall pay to Ecology costs incurred by Ecology pursuant to this Order. These costs shall include work performed by Ecology or its contractors for investigations, remedial actions, and Order preparation, oversight, and administration. Ecology costs shall include costs of direct activities; e.g., employee salary, laboratory costs, travel costs, contractor fees, and employee benefit packages; and agency indirect costs of direct activities. PRI Northwest, Inc., shall pay the required amount within 90 days of receiving from Ecology an itemized statement of costs that includes a summary of costs incurred, an identification of involved staff, and the amount of time spent by involved staff members on the project. A general description of work performed will be provided upon request. Itemized statements shall be prepared quarterly. Failure to pay Ecology's costs within 90 days of receipt of an itemized statement of costs will result in interest charges. Nothing in this section shall preclude Ecology or other federal, state, or local governmental entities from seeking to recover other costs incurred by such entities for which respondents are liable.

4. Designated Project Coordinators.

The project coordinator for Ecology is:

Mohsen Kourehdar
Department Of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

The project coordinator for PRI Northwest, Inc. is:

George T. Aoki
PRI Northwest, Inc.
733 Bishop Street
Honolulu, Hawaii 96842

The project coordinator(s) shall be responsible for overseeing the implementation of this Order. To the maximum extent possible, communications between Ecology and PRI Northwest, Inc., and all documents, including reports, approvals, and other correspondence concerning the activities performed pursuant to the terms and conditions of this Order, shall be directed through the project coordinator(s). Should Ecology or PRI Northwest Inc. change project coordinator(s), written notification shall be provided to Ecology or PRI Northwest, Inc., at least ten (10) calendar days prior to the change.

5. Performance.

All work performed pursuant to this Order shall be under the direction and supervision, as necessary, of a professional engineer or hydrogeologist, or similar expert, with appropriate training, experience, and expertise in hazardous waste site investigation and cleanup. PRI Northwest, Inc., shall notify Ecology as to the identity of such engineer(s) or hydrogeologist(s), and of any contractors and subcontractors to be used in carrying out the terms of this Order, in advance of their involvement at the Site. PRI Northwest, Inc., shall provide a copy of this Order to all agents, contractors, and subcontractors retained to perform work required by this Order and shall ensure that all work undertaken by such agents, contractors, and subcontractors will be in compliance with this Order.

Except where necessary to abate an emergency situation, PRI Northwest,

Inc., shall not perform any remedial actions at 709 Alexander Avenue, Tacoma, Washington, outside that required by this Order unless Ecology concurs, in writing, with such additional remedial actions. Additional remedial actions does not include intended demolition of above ground structure/tanks, but PRI Northwest shall inform Ecology prior to demolition of above structures/tanks on Site.

6. Access.

Ecology or any Ecology authorized representative shall have the authority to enter and freely move about the Site at all reasonable times with PRI Northwest, Inc.'s representative and/or consultant for the purposes of, inter alia: inspecting records, operation logs, and contracts related to the work being performed pursuant to this Order; reviewing the progress in carrying out the terms of this Order; conducting such tests or collecting samples as Ecology or the project coordinator may deem necessary; using a camera, sound recording, or other documentary type equipment to record work done pursuant to this Order; and verifying the data submitted to Ecology by PRI Northwest, Inc. By signing this Agreed Order, PRI Northwest, Inc., agrees that this Order constitutes reasonable notice of access, and agrees to allow access to the Site at all reasonable times for purposes of overseeing work performed under this Order. Ecology shall allow split or replicate samples to be taken by PRI Northwest, Inc., during an inspection. PRI Northwest, Inc., shall allow split or replicate samples to be taken by Ecology and shall provide seven (7) days notice before any on-site field activities (e.g., excavating, sampling).

7. Public Participation

PRI Northwest, Inc., shall prepare and/or update a public participation plan for the site. Ecology shall maintain the responsibility for public participation at the site. PRI Northwest, Inc., shall help coordinate and implement public participation for the site.

8. Retention of Records.

PRI Northwest, Inc., shall preserve in a readily retrievable fashion,

during the pendency of this Order and for ten (10) years from the date of completion of the work performed pursuant to this Order, all records, reports, documents, and underlying data in its possession relevant to this Order. Should any portion of the work performed hereunder be undertaken through contractors or agents of PRI Northwest, Inc., then PRI Northwest, Inc., agrees to include in their contract with such contractors or agents a record retention requirement meeting the terms of this paragraph.

9. Dispute Resolution.

PRI Northwest, Inc., may request Ecology to resolve disputes which may arise during the implementation of this Order. Such request shall be in writing and directed to the signatory whom is the South West Regional Toxics Cleanup Program Section Supervisor, or his/her successor(s), to this Order. Ecology resolution of the dispute shall be binding and final. PRI Northwest, Inc., is not relieved of any requirement of this Order during the pendency of the dispute and remains responsible for timely compliance with the terms of the Order unless otherwise provided by Ecology in writing.

10. Reservation of Rights/No Settlement.

This Agreed Order is not a settlement under Ch. 70.105D RCW. Ecology's signature on this Order in no way constitutes a covenant not to sue or a compromise of any Ecology rights or authority. Ecology will not, however, bring an action against PRI Northwest, Inc., to recover remedial action costs paid to and received by Ecology under this Agreed Order. In addition, Ecology will not take additional enforcement actions against PRI Northwest, Inc., to require those remedial actions required by this Agreed Order, provided PRI Northwest, Inc., complies with this Agreed Order.

Ecology reserves the right, however, to require additional remedial actions at the Site should it deem such actions necessary.

Ecology also reserves all rights regarding the injury to, destruction of, or loss of natural resources resulting from the releases or threatened releases of hazardous substances from 709 Alexander Avenue, Tacoma, Washington.

In the event Ecology determines that conditions at the Site are creating or have the potential to create a danger to the health or welfare of the people on the Site or in the surrounding area or to the environment, Ecology may order PRI Northwest, Inc., to stop further implementation of this Order for such period of time as needed to abate the danger.

11. Transference of Property

No voluntary or involuntary conveyance or relinquishment of title, easement, leasehold, or other interest in any portion of the Site shall be consummated by PRI Northwest, Inc., without provision for continued implementation of all requirements of this Order and implementation of any remedial actions found to be necessary as a result of this Order.

Prior to transfer of any legal or equitable interest PRI Northwest, Inc., may have in the site or any portions thereof, PRI Northwest, Inc., shall serve a copy of this Order upon any prospective purchaser, lessee, transferee, assignee, or other successor in such interest. At least thirty (30) days prior to finalization of any transfer, PRI Northwest, Inc., shall notify Ecology of the contemplated transfer.

12. Compliance with Other Applicable Laws.

All actions carried out by PRI Northwest, Inc., pursuant to this Order shall be done in accordance with all applicable federal, state, and local requirements.

13. Progress Report

PRI Northwest, Inc., shall submit to Ecology written progress reports every two months which describe the actions taken during the previous two months to implement the requirements of this Agreed Order.

14. Modifications

The terms of this Agreed Order, including the work plan may be modified only by written agreement signed by both parties.

VI.

Satisfaction of this Order

The provisions of this Order shall be deemed satisfied upon PRI Northwest, Inc.'s, receipt of written notification from Ecology that PRI Northwest, Inc., has completed the remedial activity required by this Order, as amended by any modifications, and that all other provisions of this Agreed Order have been complied with.

VII.

Enforcement

1. Pursuant to RCW 70.105D.050, this Order may be enforced as follows:
 - A. The Attorney General may bring an action to enforce this Order in a state or federal court.
 - B. The Attorney General may seek, by filing an action, if necessary, to recover amounts spent by Ecology for investigative and remedial actions and orders related to the Site.
 - C. In the event PRI Northwest, Inc., refuses, without sufficient cause, to comply with any term of this Order, PRI Northwest, Inc., will be liable for:
 - (1) up to three times the amount of any costs incurred by the state of Washington as a result of its refusal to comply; and
 - (2) civil penalties of up to \$25,000 per day for each day it refuses to comply.
 - D. This Order is not appealable to the Washington Pollution Control Hearings Board. This Order may be reviewed only as provided under Section 6 of Ch. 70.105D RCW.

Effective date of this Order: November 23, 1993

PRI Northwest, Inc.

By Thomas E. Pyle

Thomas E. Pyle
Vice President
PRI Northwest, Inc.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

By Megan White

Megan White, P.E.
Southwest Region Supervisor
Toxics Cleanup Program

References

The following have been used to develop this Agreed Order.

1. Ecology Files 1980-1992.
2. Ecology & Environment, Special Study Report, May 1990.
3. Commencement Bay NearShore/Tideflats, Record Of Decision (ROD), EPA Region 10, September 1989.
4. Source Control Strategy, Commencement Bay, Nearshore/Tideflats Superfund Site, EPA Region 10, May 1992.
5. Preliminary Site Investigation Work Plan and its revisions as stated on the correspondence dated September 1, 1993.

APPENDIX A

The contents of Appendix A are as follows:

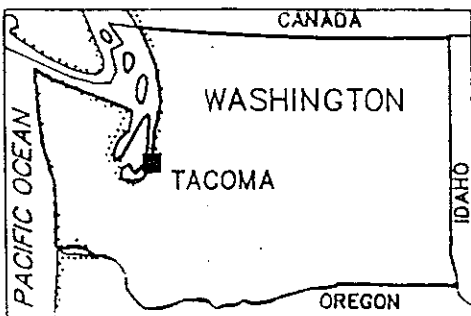
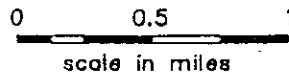
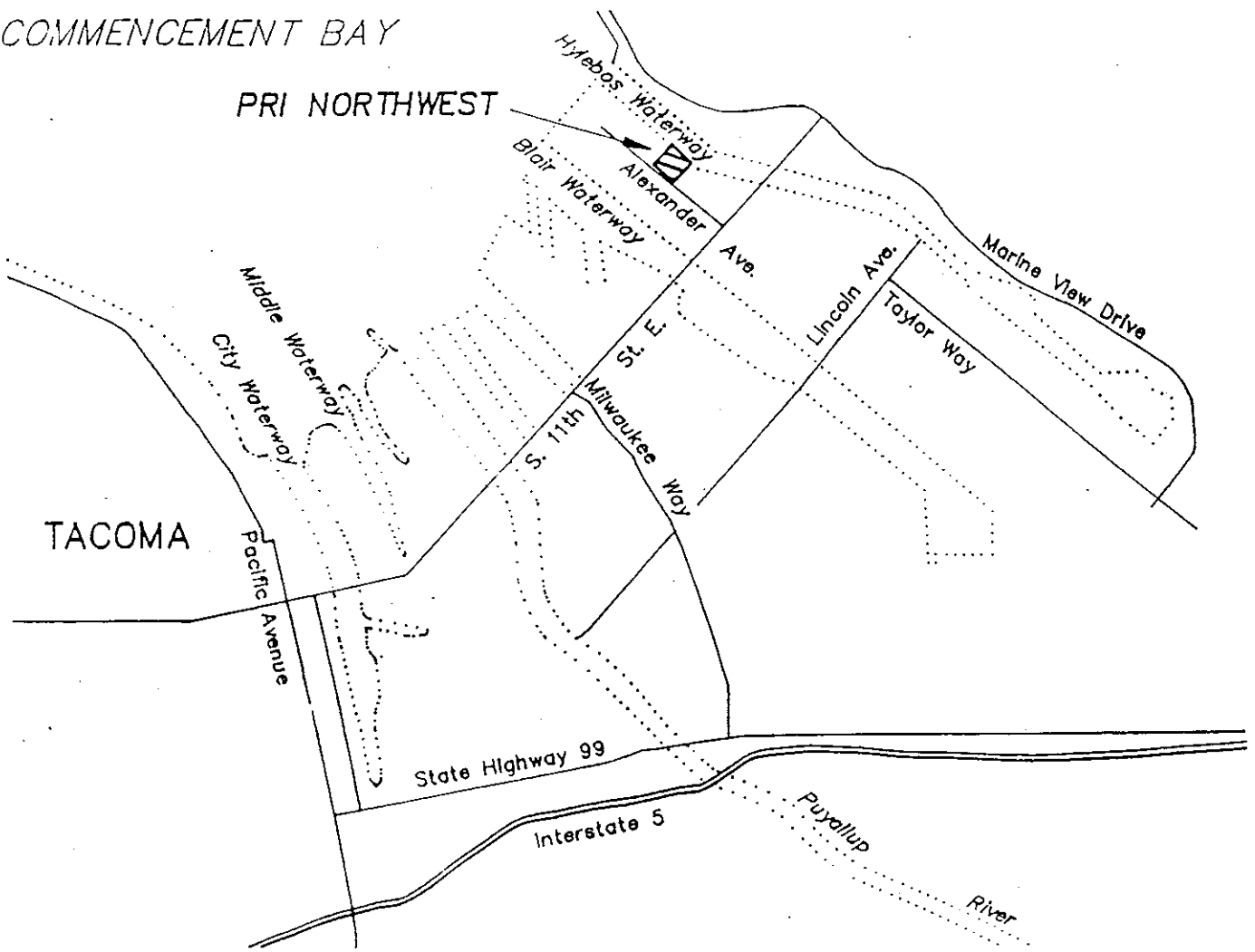
Figure 1: The site location and its boundary with respect to Hylebos Waterway.

Figure 2: The sample location map of tests pits for soil and groundwater sampling performed by Ecology and Environment in 1990.

The Table of contents from the "preliminary Site Investigation Work Plan" submitted by PRI Northwest, Inc., in July 1993.

COMMENCEMENT BAY

PRI NORTHWEST

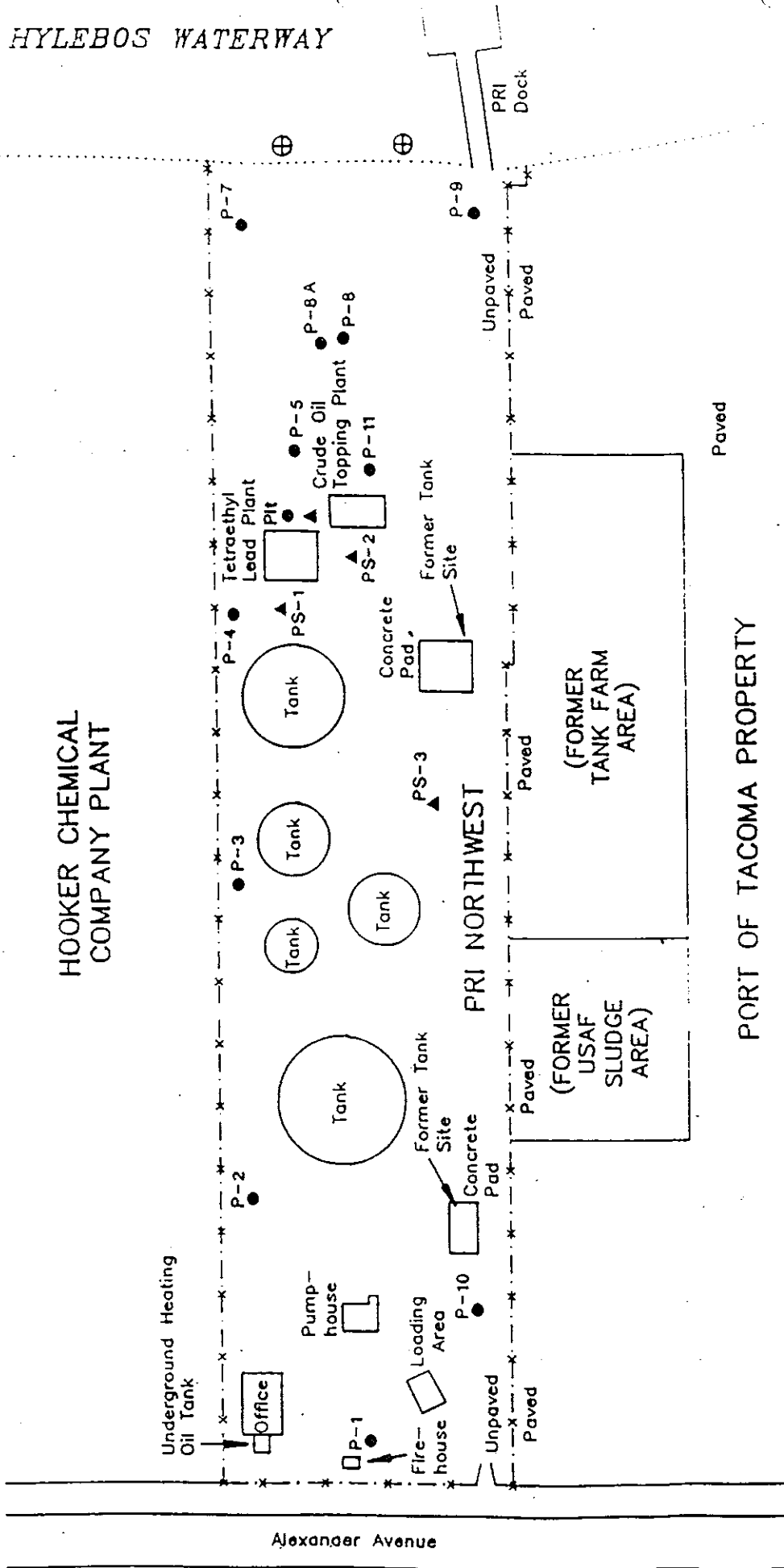


ecology & environment, inc.	
Job: F10-8901-06	Site: WA 0044
Drawn by: D.P.	Date: May 14, 1990

FIGURE 1
LOCATION MAP
PRI NORTHWEST SPECIAL STUDY
Tacoma, WA

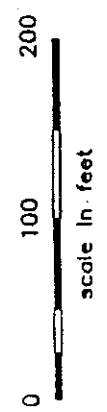
HYLEBOS WATERWAY

HOOKER CHEMICAL COMPANY PLANT



ecology & environment, inc.	
Job: F10-8901-06	Site: WA 0044
Drawn by: D.P.	Date: May 14, 1990

FIGURE 2
SAMPLE LOCATION MAP
 PRI NORTHWEST SPECIAL STUDY
 Tacoma, WA



- LEGEND**
- *—*— Fence
 - - - Property line
 - Groundwater sample
 - ▲ Soil sample

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TACOMA, WASHINGTON	
DATE PREPARED: JUNE 25, 1993	
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